

Marble Hill Parks for People Planning Statement

English Heritage

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1.0 Introduction

- 1.1 This Planning Statement has been produced by Lichfields on behalf of English Heritage to accompany applications for planning and listed building consent for a series of works to Marble Hill House and Park near Twickenham. The works are part of a 'Parks for People' Heritage Lottery Fund scheme, which has been awarded Round One funding.
- 1.2 EH was set up as a charitable trust in March 2015, with a remit to promote the conservation and public enjoyment of its properties, The National Heritage Collection, which includes some of the nation's most important sites such as Stonehenge, Kenwood, Audley End, Dover Castle - and Marble Hill, a Grade I listed Mansion set within a Grade II* Registered Park. Many of the sites are in urgent need of capital repairs and as well as increased revenue generation to meet maintenance costs, and Marble Hill is no exception. The Government expects the trust to reach self-sufficiency through revenue generation from its sites.
- 1.3 Marble Hill currently costs English Heritage £285,000 a year to run after taking into account all income currently generated. For a charity like English Heritage, this represents an unsustainable financial burden. It will never be possible to make Marble Hill cost neutral, or to make it generate a profit, however, there does exist the potential to make Marble Hill less of a financial burden on English Heritage by increasing access and ensuring that the commercial opportunities within the park are more effectively maximised. The Marble Hill Revived project will make Marble Hill more financially sustainable (by reducing this net cost is significantly) whilst at the same increasing and enhancing the estate's local contribution as a culture and leisure asset. While the park is open to the public and well-used by sports teams and walkers, Marble Hill House is currently open only two days per week by appointment. In 2016 Round One funding was successfully secured from the Heritage Lottery Fund (HLF) for a scheme to enable the House to enable it to open to the public for free, five days a week. The HLF grant will help to pay for the repair of the mansion, the registered landscape and its leisure facilities, alterations to meet Access requirements, and the extension of the stable block to accommodate a larger, higher quality café, offering additional covers. The latter proposal is the fundamental mechanism through which the project will improve the financial sustainability of the site as a whole, in that it significantly reduce the annual maintenance costs of the house and park, which currently runs at an annual deficit of approximately £280,000.
- 1.4 This planning statement sets out the rationale for the proposed development and how the development has been designed to comply with local, regional and national policy.

Report Structure

- Section 2 describes the geographical and historic context to the application site
- Section 3 provides a summary of the proposals
- Section 4 identifies the national, regional and local policies which are relevant to the application
- Section 5 describes the consultation which has informed the design
- Section 6 provides a themed assessment of the proposals against the relevant policies.
- Section 7 sets out a conclusions

2.0 **Background**

Site and Context

- 2.1 Marble Hill House and Park are located on the north bank of the Thames within East Twickenham within the London Borough of Richmond upon Thames. Marble Hill House was constructed as the residence for Henrietta House, Countess of Suffolk, between 1724 and 1729, and forms the centrepiece of the surrounding 26.7 hectares of parkland. The Park is now owned by English Heritage and has been open to the public since 1902.
- 2.2 Much of the parkland is in recreational use, accommodating sports pitches as well as play areas and a tennis court. Immediately surrounding the house are lawns to the north and south, with wooded areas either side creating a symmetrical vista to the Thames.
- 2.3 The stable block lies approximately 150m to the north-west of Marble Hill House, a two storey range with double-height archway leading to a tarmacked parking area which abuts the boundary wall to Montpelier Row. The stable accommodates ancillary functions to the Mansion – the Coach House Café at ground floor level, and park rangers flats above.
- 2.4 The latter is a single-sided row of Georgian and later town houses, several of which are listed. At the southern end of the row South End House and Montpelier House are listed Grade II*, while the gazebo to South End House is listed Grade II. The intervening boundary wall to Marble Hill House is a curtilage-listed structure.
- 2.5 To the south the park fronts the River and the Thames Path which provides riverbank pedestrian access between the A305 and Riverside, visually connecting Marble Hill Park into the surrounding Arcadian Landscape. Ham House, on the opposite bank, is another of the many former aristocratic residences between Hampton Court and Richmond, also set within a generous landscape (Petersham Meadows) and offering designed vistas to the Thames.
- 2.6 At the north east of the park lies the sports block, which provides changing facilities for sports teams (currently one sex at a time only); a playground; a 76 space car park; and an estate yard which is used to service the landscape. The areas to the north and east of the park are residential – mainly Victorian terraces and semi-detached properties and later infill.
- 2.7 The park benefits from six pedestrian/cyclist access points – three direct access onto Richmond Road to the north, two access points shared with Orleans Road to the west and two access points to the River Thames to the south. The main vehicular access is off of Richmond Road, leading to the car park.

Historic Development

- 2.8 The Marble Hill estate was purchased for Henrietta Howard, mistress to King George II. It was designed by architect Roger Morris, with input from Henry Herbert, 9th Earl of Pembroke. The design, based on Palladio's 1553 Villa Cornaro in Piombino Dese, Italy, was subsequently copied across the Thames Valley, and proved influential in the emergence of the Palladian style across England in the 18th century.
- 2.9 The stable block was constructed in the early C19th century, along with the surrounding boundary wall which is of identical construction.
- 2.10 In 1902 the parkland escaped development after a public campaign and was vested in the London County Council. Since 1986 the estate has been owned and managed by English Heritage. The house has been presented as an historic house museum, with collections of early

Georgian furniture and works of art. The Mansion was listed in 1952 and the Stable block 1983, and the Park was registered in 1987.

- 2.11 A full chronology of the park is set out in the accompanying Landscape chapter of the Design and Access Statement by J&L Gibbons. Detailed histories of the Marble Hill House and its stables are contained within the accompanying Conservation Management Plan by the Built Heritage Consultancy.

3.0 **Proposed Development**

3.1 The scheme comprises a series of works which may be grouped as four separate components covering the following:

- 1 Marble Hill House
- 2 Stable Block
- 3 Sports Block
- 4 Landscape

3.2 The principal elements to each are listed below. A full schedule of drawings and supporting documentation to the proposals is contained in the contents page to the Design and Access Statement, and is repeated within this Statement at Appendix 2 for reference.

Marble Hill House

- 1 Refurbishment and repairs, including repair to the roof and windows, repair of external render
- 2 Reordering of modern internal spaces
- 3 Asbestos removal
- 4 Upgrade of services to comply with modern building regulations, including fire protection
- 5 Insertion of a platform lift to allow access to the first floor, in response to Equality Act (2010) provisions

3.3 A full schedule of works for the house is provided by Acanthus Clews.

Stable Block

3.4 Refurbishment and extension of the stable block within the courtyard area to deliver a 60 internal and 80 external cover café (currently 25 internal covers) and supporting kitchen area with plant. The extension comprises an 'L' shaped footprint abutting and running parallel to the curtilage listed wall, the long range accommodated under a monopitch roof leading to a flat roof over the café entrance. A short section of the curtilage listed wall behind the stable block would be reconstructed (the existing bricks would be carefully taken down, salvaged and relaid, supplemented with bricks from the north and south stable yard walls if necessary) to support the new roof. The rebuilt wall would rise to a datum level of 2.8m, with zinc cladding then rising up to a height of 3.9m.

3.5 Full details are provided within the relevant drawings by vHH Architects.

Sports Block

3.6 Internal alterations to the sports block changing rooms to cater to both male and female users, (currently the sports block can only cater for one sex at a time which means that due to demand from male users being much higher, that female users are generally excluded), and provision of ramped access externally. Full details are provided within the drawings produced by Acanthus Clews Architects.

Landscape

3.7 The proposed landscape works comprise:

- 1 Restoration of the 18th century pleasure gardens with new planting arrangements and landscaping.
 - 2 Implementation of an arboricultural management strategy designed to protect historic trees and provide for tree succession which
 - 3 Reinstatement of the 18th century bowling alley and repair and upgrade of play areas and tennis courts
 - 4 Adjustment of levels to the south lawn to ensure flood storage capacity neutrality or enhancement
 - 5 Installation of a Sustainable Urban Drainage system to improve drainage rates at the southern part of the south lawn.
- 3.8 Full details are supplied within the Landscape chapter of the design and Access Statement by J&L Gibbons.
- 3.9 For the avoidance of doubt it should be noted that the pre-application scheme included a proposal for the temporary erection of a marquee for use for weddings and hospitality events. Following feedback from the Council this has been removed from the scheme altogether.

4.0 **Statutory and Policy Considerations**

Introduction

- 4.1 This section provides an overview of the relevant legislation and policies at all levels of the planning hierarchy which have informed the development proposals. Relevant policy wording is discussed in relation to the planning issues set out in the assessment section.

Statutory Considerations

- 4.2 Section 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the Local Planning Authority to have special regard for the desirability of preserving the special interest of listed buildings and their settings.
- 4.3 Section 72 of the Act requires the Local Authority to pay special attention to the desirability of preserving the character and appearance of Conservation Areas, which are areas designated for their special architectural or historic interest.

National Policy and Guidance

National Planning Policy Framework

- 4.4 The National Planning Policy Framework (NPPF) was published in March 2012. At the heart of the NPPF is the achievement of sustainable development – this includes securing high quality design, ensuring the vitality of town centre, and conserving heritage assets in a manner appropriate to their significance. Paragraph 19 highlights the need to ensure that the planning system does everything it can to support sustainable economic growth. In particular it states that “planning should operate to encourage and not act as an impediment to sustainable growth”. To help achieve economic growth, paragraph 20 highlights the need for the planning system to “plan proactively to meet the needs of business and to support an economy fit for the 21st Century”.
- 4.5 The following sections of the NPPF are relevant:
- Section 1 – Building a strong, competitive economy
 - Section 4 – Promoting sustainable transport
 - Section 7 – Requiring good design
 - Section 8 – Promoting Healthy Communities
 - Section 11 - Conserving and enhancing the natural environment
 - Section 12 – Conserving and enhancing the historic environment

National Planning Practice Guidance

- 4.6 The National Planning Practice Guidance (NPPG) was published in March 2014 and sets out guidance for new development, together with the national policies set out above. In particular it provides more detailed guidance in relation to heritage and the natural environment.

Development Plan

- 4.7 The statutory development plan for the London Borough of Richmond comprises the London Plan 2016 together with the London Borough of Richmond Local Plan Core Strategy (2009), Development Management Policies (2011) and supplementary planning documents and

guidance. The publication version of the Local Plan was published in February 2016 and has been adopted by the Council for development management purposes and should be considered a material consideration. The relevant policies from the Local Plan are listed in Appendix 1.

Designations

- 1 Metropolitan Open Land (MOL)
- 2 Other site of Nature Importance
- 3 Protected View (Indicative Zone) (DMP): No.4 View from near Ham House to Orleans; No.5 View to Marble Hill House (north)
- 4 Protected Vista (Indicative 20 metre Buffer) (DMP)
- 5 Public Open Space: Site Marble Hill (DMP)
- 6 Thames Policy Area (DMP)
- 7 Archaeological Priority Area
- 8 Twickenham Riverside Conservation Area
- 9 Proposal Site T18 Marble Hill Park
- 10 Flood Risk Zone 3 (southern part of the site only)

Planning History

- 4.8 The application site has been subject to various planning and listed building consent applications, as well as applications for works to trees. The following applications are relevant:
- 4.9 **04/2487/COU:** To expand the use of Marble Hill House for use as a venue for functions and civil wedding ceremonies on ground and first floor (subject to license) outside existing opening hours (approved 21-04-05).
- 4.10 **04/0979/FUL:** Erection of Marquees on Rear Lawn for Not More Than 16 Events per Year. Approval Sought for Trial 3 Year Period (withdrawn 17-05-04).
- 4.11 **94/0236/LBC:** Relocation of shop, Control Room and Toilets on Ground Floor and Re-establishment of Existing Doorway (approved 12/05/1994).

5.0

Consultation

- 5.1 The proposals have been designed alongside a comprehensive consultation programme, led by a dedicated Audience Development Manager, which covered the following
- 1 Restoring Henrietta Howard's Georgian garden (including plans to fence a proportion of the garden)
 - 2 Re-interpreting the house and installing a lift for access
 - 3 Creating a café, shop at the Stable Block and play area nearby
 - 4 Enhancing the pitches at Marble Hill Park and re-configuring the changing areas
 - 5 Managing current woodland and creating and enhancing biodiversity at Marble Hill
- 5.2 Consultation took place between November 2016 and March 2017 and included the following:
- 1 Stakeholder workshop (18-11-16): 15 groups
 - 2 Public drop-in day (19-11-16): 246 people
 - 3 Dog walkers' consultation (25/26-11-16): 34 people
 - 4 Community group outreach visits (11 and 12-16)
 - 5 Sports groups meeting (24-01-17): 17 people
 - 6 Public meeting (25-01-17): 34 people
- 5.3 The overall response to the proposals was overwhelmingly supportive with 98% of respondents to the community survey indicating that they felt the proposal would have a positive impact on the local community. Key concerns centred around the effects of increased opening on local traffic, the proposal to erect a fence around the reinstated Georgian Gardens, and the potential for the stable café extension to give rise to noise and smell. Because of the feedback which English Heritage has received about the proposal to fence a proportion of the garden during this consultation process, English Heritage has removed this element from the proposals for which it is seeking approval through this planning application and will subsequently give further consideration to the need (or otherwise) for such a fence and will consult more widely as part of this process. For avoidance of doubt, the fenced area between the river and the house is not part of this planning application and any residual references to it in documentation should be ignored.
- Other than the removal of the fenced area, the accompanying Community Engagement Report sets out how these have been addressed and provides further detail on the consultation programme as a whole.
- 5.4 In addition the owners of South End House and Montpelier House were consulted on the design of the stable block, including meetings on 18th October and 9th November 2016 and 21 February 2017. The principal concerns were the potential for noise from plant and deliveries, and at the height of the proposed wall. An acoustic report is provided with the application and shows that noise levels from the proposed plant will fall within acceptable limits. The residents of Montpelier House were keen to maintain a 'green' outlook, in response to which the service yard enclosure was moved east and the perimeter shrubberies were reinforced to improve screening. The Design and Access Statement provides details of how the neighbour consultation has informed the overall design, including the various options that were considered to address amenity concerns.

- 5.5 The Council's pre-application advice was sought in October 2016 who met the applicant on site on 10th October, and a response was provided on 31st January 2017 (attached at Appendix 3). Principal comments included the need for clear justification for the proposed development within Metropolitan Open Land, for the proposed reconstruction of the stable block wall, and concerns at the effect of the stable block design on neighbouring amenity. A further pre-application meeting was held on 6th March 2017 to address the issues raised. The applicant updated officers on the various technical studies which had been produced since the pre-application advice was issued by way of heritage and open space justification. Ten different design options for the stable block were reviewed in order to collaboratively address concerns regarding residential amenity of the neighbouring properties. The design comments, which were recorded in a meeting note attached at Appendix 3, have directly informed the submitted design.
- 5.6 The proposals were presented to officers at Historic England at a meeting in 7th February 2017. Within their formal advice, issued on 10th. Officers expressed strong support for the proposals, noting in particular:
- 1 Strong support for the approach to the landscape restoration, including the installation of any estate railings along historic land divisions at the south end of the pleasure grounds
 - 2 Support for the design for the stables, including reconstruction of the curtilage-listed wall to South End House, acknowledging that there may be minor 'less than substantial' harm to the wall, to the setting of the stables, and to the setting of South End House, but noting that the this would be 'decisively outweighed by the substantial public benefits' offered by the scheme as a whole
 - 3 No objection to the proposed insertion of a lift at Marble Hill House or the minor alterations proposed, which have no impact on the areas of high significance

6.0 Planning Assessment

Land Use

- 6.1 Marble Hill House is currently an under-utilised local cultural facility, being open only two days per week by appointment only. Marble Hill Park is tired and in need of improved supporting facilities for park users. The proposed intensification of use supports an anticipated 16% increase in visitors by 2020, and enables a cultural venue of national significance to be open to the public five days per week.
- 6.2 This is a major local cultural benefit, providing free entry to a flagship heritage asset within the National Heritage Collection which will enhance the Borough's tourism and visitor offer (LP43) within the region. Together with the extended capacity at the stable block and investment into the park, the scheme will transform the Park's quality as a destination for leisure and recreation (CP20, London Plan policy 4.6) at the same time as improving economic and employment opportunities (LP40) – the project will create 17.5 additional full time equivalent positions. The proposal would support Thames Policy Area objectives (Policy DM OS 11) in conserving the heritage of the River and promoting its enjoyment. The accompanying documentation demonstrates that harm to other areas of planning can either be avoided altogether or mitigated.

Open Space

- 6.3 The location proposed for the stable block extension is a small rear courtyard sandwiched to the east and west between the stable block itself and the boundary wall to Nos.29 and 30 Montpellier Row (to the east and west). To the north and south it is partially enclosed and heavily screened by trees. The proposed kitchen and service yard extend into the patch of land north of the stable block, an area which is currently both fenced off and screened from public view.
- 6.4 Marble Hill Park, including the stables area, is designated as Metropolitan Open Land (MOL) which, under the London Plan policy 7.17, is afforded a high level of protection from inappropriate development other than '*essential ancillary facilities for appropriate uses*' which do not harm the openness of the MOL. This protection is reinforced in local policies DM OS2 and LP13. The latter notes that '*Development will be supported if it is appropriate and helps secure the objectives of improving Metropolitan Open Land*'.
- 6.5 The proposed development comprises a small scale extension of an ancillary function to the use of the MOL – facilities to be available for use by those enjoying the park for leisure, recreation and other cultural activities, including visits to Marble Hill House, with opening hours tied to those of the Park. On this basis the proposed development should be acceptable in principle, subject to acceptable impact on the openness of the Park.
- 6.6 The rear courtyard itself makes no contribution to character and openness of the Metropolitan Land due to its position and enclosure within the landscape. The low-slung design would remain screened from the park by the existing stable frontage, and would the effect on the openness of the park, and on the important historic vistas north and south to the Marble Hill House (DM HD7), would therefore be negligible.
- 6.7 Should the development not be considered policy compliant in principle, it would meet the special circumstances tests set out in policies DM OS2 and LP13. It does not harm the character and openness of the MOL; it is linked to the functional use of the MOL and supports outdoor open space uses, including financially supporting the restoration and maintenance of the open space.

- 6.8 The proposed development meets the objectives set out in The LB Richmond Upon Thames Playing Pitch Strategy (2015), particularly Objective 2. It will enhance the existing pitches and ancillary play and leisure facilities, improving their quality and management. The scheme will improve funding security for the maintenance of the pitches and includes proposals to upgrade the quality of the existing changing facilities and their suitability for female users. The drainage proposals will improve pitch management and condition. The proposals will not lead to overplay of the existing pitches since the overall capacity of the changing facilities will not change. Notwithstanding this, the proposals include measures to improve soil and turf management based on an agronomy survey (see accompanying Soil Resource Survey).
- 6.9 In sum, the proposals accord with policies DM OS 2, OS 3, OS 6, OS 7, and OS 8, as well as emerging Local Plan Policies LP 10, 13, 14, 30 and 31.

Design and Heritage

- 6.10 In accordance with the requirements set out at paragraph 128 of the NPPF the proposals have been carefully informed by a detailed understanding of the historic significance of the heritage assets which would be affected by the proposals. The significance of these assets, and an assessment of the proposals' effects on them, is set out in the accompanying Conservation Management Plan by the Built Heritage Consultancy, the Heritage Statements by English Heritage, and Landscape chapter of the Design and Access Statement, by J&L Gibbons. A summary is provided of the effects on the separate elements of the scheme.

Marble Hill House

- 6.11 The proposed alterations to Marble Hill House comprise comprehensive repairs, minor alterations to modern areas within the plan form, and the installation of a platform lift. The location of the lift was identified following an options appraisal by vHH Architects, and provides the optimum access within the constraints posed by the historic fabric. The lift would be located within the much altered closet rooms immediately to the east of the main stair, currently in use as a control room. This location minimises harm to the building's internal fabric and historic character, avoids any visual harm to the exterior, but provides access closely aligned to the principal vertical circulation route within the building. Historic England has indicated that they have no objections to the proposed alterations to Marble Hill House as these have no impact on areas of high significance.

Stable Block, curtilage listed wall and listed structures at Montpelier Row

- 6.12 The curtilage listed wall to the stable block has a 140mm lean over 1.74 along a 6m section. The accompanying structural assessment by the Morton Partnership has found that buttressing the wall is unlikely to be effective over the longer term and reconstruction offers the opportunity to address this safety issue whilst enabling the construction of a viable extension which will cross-fund the maintenance of the Marble Hill estate, including the Grade I listed House and Grade II* Registered Park.
- 6.13 The age and construction of the wall has been assessed by Lee Prosser, in order to understand the effect of reconstruction on the significance of the wall in terms of its historic fabric, and in terms of its historic role as a curtilage boundary structure to the Marble Hill estate and to the neighbouring properties. The report has found that the construction of the wall is identical to that of the early C19th stable block, ie. that they were built together. The western section has been much repointed in modern materials, as well as having been reduced in height – from originally 2.45m to 2.2m, possibly in response to structural failure. The northern return has also been partially rebuilt.

- 6.14 The primary significance of the courtyard wall is its historic and evidential value in defining the historic boundary to the Marble Hill estate, and in providing a sense of enclosure to the rear of the stable block. Whilst partial reconstruction of the wall would entail some very limited loss of historic fabric (since the existing bricks would be reused in the rebuild), it would also secure the longevity of the wall and therefore its evidential and historic value as a boundary feature.
- 6.15 Following the Council's pre-application advice ten different design options were reviewed with the Council to achieve the optimum scheme with regard to design, heritage and the impact on neighbouring amenity. The options appraisal included consideration of a scheme which would be independent of the wall. However this was discounted for two reasons: firstly on grounds of maintenance, since water would collect behind the café extension leaving the rebuilt wall prone to saturation; secondly because doing so would considerably reduce the amount of public amenity space in the area, as well as reducing the number of covers, and in doing so compromising the viability of the café in its role as a financial subsidy to the maintenance costs of Marble House and Park. It was agreed that the optimum solution would be to reconstruct the wall to create a datum height of 2.8m, to enable it to act as a structural support to the extension. The wall would be reconstructed using the existing bricks and re-laid in the existing bond. This is the approach which has been followed through in the design drawings prepared by vHH Architects – see drawing series 533-L-100 to 533-L-330.
- 6.16 The extension is a single storey, accommodated under an east-sloping zinc mono-pitch roof (which reaches a maximum height of 3.9m) running parallel to the wall. The 2.8m wall height would ensure a greater proportion of solid brick to zinc cladding. In its scale, contemporary form and materials, and the orientation of the roof slope, the extension has been designed to respectfully contrast the architectural style and height of the listed stable block. The kitchen ventilation equipment has also been designed to minimise visual impact – the extract will vent through vertical slatted panels in the north façade with the boiler flue sitting against the northern wall of the existing stable, painted black to look like a soil pipe. Full details are provided within the Design and Access Statement by vHH Architects.

Landscape

- 6.17 The history and significance of Marble Hill Park has been comprehensively identified through a Landscape chapter of the Design and Access Statement, by J&L Gibbons, which provides the basis for a series of proposals for the restoration of the parkland. The landscape strategy seeks to reinstate and reinterpret the 1752 and later 18th century landscape which was the creation of Henrietta Howard and her friends. Key measures include: management of the trees and woodland to restore their historic character and support succession; reinstatement of the 18th century pleasure grounds to the south of Marble Hill House; improvements to accessibility through resurfacing, rationalised furniture and better interpretation.
- 6.18 Historic England's officers reviewed the landscape proposals in February 2017 and commented that *'we strongly support the principle of restoration of the historic landscape, and believe the approach has been well informed by the 1752 survey. In our view, restoration could result in significant enhancement of the Grade II* registered landscape'*. Indeed, the landscape proposals comprise a significant heritage benefit which weigh in favour of the application.

Heritage balance

- 6.19 Paragraph 132 of the NPPF states that any harm to a designated heritage asset requires clear and convincing justification, and under paragraph 134 the reconstruction of the curtilage-listed wall should be treated as 'less-than-substantial' harm. The harm is very low given that extent of demolition proposed very limited, and that the existing bricks would be salvaged and reused with minimal loss of the original fabric. Notwithstanding the altered height of the wall the

reconstruction work may essentially be considered in part a repair which would reinstate the evidential value of the wall as an historic boundary structure.

- 6.20 The partial rebuilding of the wall is necessary to rectify its currently unstable condition and deteriorating condition in any case. The reconstruction proposed enables the stable block café to be expanded to provide a 60 internal and 80 external cover café which is necessary to secure the long-term optimum viable use of the estate which currently runs a sizeable deficit (£285,000 p.a.) that cannot be met by revenue generated by the house alone (income from the house and cafe currently stands at only £22,148p.a.).
- 6.21 Taken together this application comprises a package of proposals for the comprehensive repair, restoration and long term maintenance of a Grade I listed mansion and Grade II* Registered Park, which decisively outweigh the very limited harm to the curtilage listed wall which is of minor significance within the estate as a whole. This view is supported by Historic England in their formal pre-application advice of 10-02-17 in which they have expressed their whole-hearted support for the scheme, including the Stable Block extension and the internal alterations to Marble Hill House.
- 6.22 Considered in terms of the requirements set out under Sections 66(1) and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, these benefits comprise powerful material considerations which clearly outweigh the presumption in favour of preservation. On balance the proposals will considerably enhance the character and appearance of the Twickenham Riverside Conservation Area (Policy DM 10), and complies with local policies DM HD2 (Listed Buildings), DM OS 4 (Historic Parks), and LP 3 (Designated Heritage Assets).

Archaeology

- 6.23 The Archaeological potential of the Site has been established as set out in the report by Magnus Alexander. The Archaeological Impact Assessment of the proposals, by Brian Dix, sets out the necessary measures to mitigate harm to archaeology, including proposals requiring prior archaeological excavation, archaeological supervision and archaeological monitoring during groundwork. These can all be secured by condition, in compliance with Policy DM HD 4.

Residential Amenity

- 6.24 The wall to the stable courtyard is of varied height – approximately 1.7m at its lowest visible point, and rising to 2.2m at its highest, having once been 2.45m (see the archaeological report by Lee Prosser). As currently covered with ivy, the boundary reaches between 1.7 and 3m. The Council raised concerns regarding the effect of the pre-application design on the residential amenity of South End House.
- 6.25 In response to pre-application feedback the stable block design was reviewed at a meeting with the Council on 6th March 2017, on the basis of the discussions the scheme was revised to achieve an optimal design which would address both heritage and amenity concerns. Within the preferred design, (ie the design which has been pursued for this application) the boundary wall to South End House would be reconstructed to a height of 2.8m. The zinc-clad stable block extension would then rise off of the wall to a maximum height of 3.9m, a reduction of 0.9m compared with the pre-application design.
- 6.26 This reduction in height ensures that the extended wall would not be visually intrusive or overbearing in views from South End House (Policy LP 8). In any case it should be noted that the visual effect of the raised boundary wall is limited since the wall lies almost 15m from the building line of the house and faces onto a driveway leading to the garage behind dense vegetation.

- 6.27 This planning application is also supported by acoustic and odour assessments which identify the effect of noise and odour emitted by the kitchen and its associated plant, as well as the potential for noise from the stable courtyard when in use during the day.
- 6.28 The acoustic report by HRS notes that reverberation control in the newly formed Café is to be provided by acoustic treatment to the soffit formed of timber slats backed with acoustically absorbent insulation wool. The report recommends that the system provides a minimum Class C acoustic absorption and that an allowance should be made for Class D acoustic ceiling tiles in the newly formed Kitchen area.
- 6.29 HRS has proposed building services noise limits at identified noise sensitive receptors (NSRs) most exposed to the proposed scheme in line with guidance outlined in '*London Borough of Richmond upon Thames: SPD*'. It is recommended that external noise from new building services plant does not exceed 5 dB below the existing representative background noise level when assessed at the nearest noise sensitive receptors in line with BS 4142:2014 '*Methods for rating and assessing industrial and commercial sound*'. BS 4142:2014 states that this is an indication of the specific sound source having a low impact.
- 6.30 The proposed ventilation arrangements are set out within the Mechanical Electrical report by Martin Thomas Associates. The extract system is fitted with sophisticated UV filter treatment to remove odours so that neither the neighbours nor members of the public will be affected by cooking smells.
- 6.31 Services management has been fully considered within the Design and Access Statement by vHH Architects which shows how refuse storage and collection has been integrated into the design as required by Policy LP 24.

Transport and Parking

- 6.32 The baseline transport conditions have been assessed in the accompanying Transport Assessment by Vectos. The report shows that the application site has a 'good' level of public transport accessibility (PTAL 4), with frequent bus services nearby and rail Services from St Margaret's Station and Richmond.
- 6.33 To assess existing visitors numbers English Heritage commissioned in June 2015 a number of survey counts to establish the number of daily visitors to the park. Cameras were placed at each of the six pedestrian access points and the main vehicular access. The number of people and vehicles entering and exiting the park were then counted for two full days - a weekend day, Saturday 20th June, and a week day; Monday 22nd June 2015. The weather was fair and generally representative of early summer.
- 6.34 In accordance with policies DM TP 1, TP 2, and TP 8, LP 44 and LP 45 the assessment demonstrates that the existing 76 space car park (with 3 disabled parking bays) would be sufficient (and with reserve capacity) to accommodate the minor increase in vehicle trips created by the proposals, and that there would be no material impact on the surrounding highway network in terms of either vehicle trips or parking demand. Additional demand from the additional 20 staff which will be required to manage the House during the extended opening hours, and the extended café, will be able to use the estates yard at the north east of the Park.
- 6.35 The landscape proposal include measures to enhance the existing routes through the park with improved surfacing and enhanced entrances, in accordance with policies DM TP 3, TP 6 and TP 7.

Health Impact Assessment

- 6.36 The proposed development retains and enhances existing sports and recreational provision within Marble Hill Park, including repairing and updating existing play facilities. The increased opening hours to Marble Hill House, and landscape restoration proposals, will drive greater and more frequent use of the parkland for healthy activities such as walking and outdoor play and sport. The stable block extension will financially support the maintenance of the public park over the longer term.
- 6.37 The Rapid Health Impact Assessment Tool published by the Healthy Urban Development Unit (2013) has been used to appraise the effects of the scheme and shows that the proposals will deliver a wide range of positive health outcomes within the locality. The only negative effect of the proposals would be the temporary impacts of noise, dust and vibration during construction. These would be managed through the implementation of measures set out in the Construction Management Strategy by J&L Gibbons.

Sustainability

- 6.38 The Local Plan requires that commercial developments of over 100sqm meet BREEAM Excellent standard. A full range of energy and resource efficiency measures have been investigated for the site, however due to the physical constraints and heritage constraints of the site in the setting of the Grade II listed stables and curtilage listed boundary wall this is not feasible. This included, for example, consideration of the feasibility of a green roof (Policy DM SD 5), however the trees which overhang the site would not allow sufficient light for the living roof to survive.
- 6.39 The effect of the site constraints is reflected in the overall score of 41 ('Minimal effort to increase sustainability beyond general compliance') attained within the accompanying Sustainable Construction Checklist.
- 6.40 However the Environmental Sustainability Statement by Martin Thomas Associates Ltd sets out the energy measures which can be achieved on the site within the constraints set by the historic environment in accordance with Policies DM SD 1, SD 2, SD 3 and SD 4, and LP 20 and LP 22. The proposed services strategy to the stable block will include a range of measures to maximise energy and water efficiency (Policy DM SD 9) and to minimise light pollution. These include a high efficiency fully condensing natural gas boiler controlled to maintain maximum seasonal efficiency through the use of reduced flow and return temperatures; natural ventilation, insulation to pipe and ductwork; automatic lighting controls and energy efficient fittings.

Trees and Ecology

- 6.41 A full suite of landscape documents are included within the supporting documentation, including Landscape Conservation and Management Plans, Arboricultural Management Plan and a Tree Survey Report. These provide the basis for the landscape proposals, which incorporate a range of habitat improvements as required under Policy DM OS 5, including the addition of 1.3ha of semi-improved grassland at the northern boundary of the park, new areas of wetland habitat at the south and at east and west meadows, reinstatement of historic trees within the Pleasure Grounds, and further tree planning within the East Meadow. The arboricultural interventions have been designed achieve an optimum design based on four objectives: health and safety; reinstatement of the 18 Century landscape; successional tree planting; the likely effects of climate change; and general woodland management best-practice. The proposals will make a positive contribution to the wider green and blue infrastructure network and protect and enhance the Borough's biodiversity, in accordance with Policy LP 15, 16 and 18.

- 6.42 FOA Ecology have assessed the application site for the presence of Bats and found no direct evidence that Marble Hill House, the Grotto or Ice House are in use by bats. However bat passes detected in the September 2016 survey suggest the potential for bat roosts in the vicinity of the stable block. Formal building surveys (internal and external) are recommended to cover the stable block store building, Grotto, Pagoda, Disused Toilet Block, Ticket Shed, Sports Block and buildings associated with the Marble Hill Adventure Playground. A daytime ground level bat roost assessment of any trees to be felled is recommended, followed by further investigation if bat roost potential is found. It is recommended that FOA has input into detailed designs for the external lighting to the stable block. These measures can all be secured by condition.

Flooding and Drainage

- 6.43 The Flood Risk Assessment by Peter Brett Associates shows that the majority of the site is within Flood Zone 1 'Low Probability' and the south and southwest of the site lies partly within Flood Zone 3 'High Probability' of the River Thames (as defined in NPPF Planning Practice Guidance (PPG) 'Flood Risk and Coastal Change' Table 1). Detailed analysis of topographical survey and Environment Agency (EA) modelling data confirms the probability of flooding and Flood Zone classification. The Strategic Flood Risk Assessment and Preliminary Flood Risk Assessment mapping aligns with the EA mapping.
- 6.44 The Assessment proposals for café extension constitute a 'less vulnerable' land use, which is considered appropriate within Flood Zone 1, and the landscaping works constitute a 'water compatible' development, which is considered appropriate in Flood Zone 2 and 3 (reference NPPF PPG Tables 2 and 3). The Sequential Test is passed as the works are associated with extending an existing café and landscaping works to enhance the existing contour arrangement. This development cannot be located anywhere else.
- 6.45 The flood risk mitigation strategy for the development consists of the following elements:
- A flood compensation scheme provides an increase of 204 m³ in floodplain storage capacity over the site, on a level-for-level basis, up to the Maximum Likely Water Level (MLWL) for 2100 contained within the EA modelling.
 - Continuous safe access from the site is provided at the 1 in 100 annual probability plus climate change flood level via Richmond Road.
 - The additional impermeable areas associated with the café service yard and infilling of the carriage circle lawn will drain via infiltration into the adjacent ground.
- 6.46 In summary, the FRA demonstrates that the proposed development is safe and in accordance with the requirements of national and local planning policy, including policies DM SD 8 and DM SD 6.

7.0 Conclusions

- 7.1 The scheme submitted by English Heritage seeks to deliver the restoration, enhancement and long term maintenance of Grade I listed Marble Hill House and Grade II* Listed Marble Hill Park, which is a popular public park within the Twickenham area. Key to the long-term financial sustainability of the estate is the construction of an extension to the Grade II listed stables, located just to the north west of the Mansion.
- 7.2 The application site as a whole lies within Metropolitan Open Land, which is afforded the highest level of protection by the Statutory Development Plan. Within these areas development is only permitted which is small scale, ancillary to the use of the land, and which does not harm its open character. The proposed café extension meets these tests – it would make additional facilities available to those visiting Marble Hill House and Park, and its opening hours would be constrained by those of the Park, although it is not intended to open the café in the evening at all, despite the park being open during the evening in summer months.
- 7.3 The construction of the stable block is dependent on the reconstruction of a section of curtilage listed wall which forms the boundary to neighbouring South End House. Structural investigations have shown that reconstruction is the only way to secure the condition of the wall over the longer term. The brickwork within the relevant section of wall is of early C19th origin and of limited significance relative to the Registered Landscape and Marble Hill House. Its reconstruction enables the delivery of an extension to the café which would cross-fund the long term maintenance of the Mansion and the surrounding landscape.
- 7.4 The design of the stable block design has been finalised in collaboration with the Council following a pre-application meeting in early March 2017, to achieve a design outcome which is appropriate in heritage terms but also acceptable in terms of the potential for visual intrusion into the neighbouring property, South End House.
- 7.5 In sum, the scheme will deliver a wide range of public benefits to the local area, which should weigh overwhelmingly in favour of the approval within the planning balance. These include:
- 1 The restoration of and securing the long term financial sustainability of a Grade I listed Marble Hill House, one of the most significant Palladian villas in the country
 - 2 Increased access to the Grade I-listed heritage asset with the introduction of free entry to the Marble Hill House, and opening hours more than quadrupled, and the installation of a lift to meet DDA provisions. Access to the House and Park will be further enhanced by the introduction of a more accessible form of interpretation providing enhanced educational, social and community value.
 - 3 Restoration and securing of long term financial sustainability of a Grade II* Registered Park through the reinstatement of the 18th century landscape which is recognised as an asset of international importance;
 - 4 Optimisation of a currently under-used local tourist attraction;
 - 5 Improved access to and management of a local open space which is designated Metropolitan Open Land, including improve sports facilities, totalling £6m of inward investment;
 - 6 The creation of an additional 17.5 full time equivalent jobs as a direct result of the extension of the café, and of the increased opening hours in the house and shop. The posts will include 5 apprenticeships which will be proactively advertised to local people every year.
 - 7 An expanded programme of public events and other community engagement activities.

- 8** Habitat improvements across Marble Hill Park, including 1.3ha of semi-improved grassland and 0.7ha of wetland habitat.

Appendix 1: Relevant Policies from the Local Development Plan

The London Plan (March 2016)

- 1.1 Delivering the Strategic Vision and Objectives for London
- 2.1 London in its Global, European and United Kingdom Context
- 2.6 Outer London: Vision and Strategy
- 2.7 Outer London: Economy
- 2.8 Outer London: Transport
- 2.18 Green Infrastructure: The Multi Functional Network of Green and Open Spaces
- 3.2 Improving Health and Addressing Health Inequalities
- 3.19 Sports Facilities
- 4.1 Developing London's Economy
- 4.5 London's Visitor Infrastructure
- 4.6 Support for and enhancement of Arts, Culture, Sport and Entertainment
- 5.1 Climate Change Mitigation
- 5.2 Minimising Carbon Dioxide Emissions
- 5.3 Sustainable Design and Construction
- 5.4 Retrofitting
- 5.5 Decentralised Energy Networks
- 5.6 Decentralised Energy in Development Proposals
- 5.7 Renewable Energy
- 5.8 Innovative Energy Technologies
- 5.9 Overheating and Cooling
- 5.10 Urban Greening
- 5.11 Green Roofs and Development Site Environs
- 5.12 Flood Risk Management
- 5.13 Sustainable Drainage
- 5.14 Water Quality and Wastewater Infrastructure
- 5.15 Water Use and Supplies
- 6.3 Assessing Effects of Development on Transport Capacity
- 6.9 Cycling
- 6.10 Walking
- 6.12 Road Network Capacity
- 6.13 Parking
- 7.1 Lifetime Neighbourhoods
- 7.2 An Inclusive Environment

- 7.4 Local Character
- 7.6 Architecture
- 7.8 Heritage Assets and Architecture
- 7.9 Heritage-Led Regeneration
- 7.14 Improving Air Quality
- 7.15 Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and Promoting Appropriate Soundscapes
- 7.17 Metropolitan Open Land
- 7.18 Protecting Open Space and Addressing Deficiency
- 7.19 Biodiversity and Access to Nature
- 7.21 Trees and Woodlands
- 7.29 The River Thames

London Borough of Richmond-Upon-Thames Core Strategy (2009)

- CP 1 – Sustainable Development
- CP 2 – Reducing Carbon Emissions
- CP 3 - Climate Change – Adapting to the Effects
- CP 4 – Biodiversity
- CP 5 – Sustainable Travel
- CP 6 – Waste
- CP 7 – Maintaining and Improving the Local Environment
- CP 10 – Open Land and Parks
- CP 11 – River Thames Corridor
- CP 16 – Local Services/Infrastructure
- CP 17 – Health and Well-being
- CP 19 – Local Business
- CP 20 – Visitors and Tourism

London Borough of Richmond-Upon-Thames Development Management Policies

Table 7.1

Development Management Policies (2011)	Draft Local Plan Policies
For a Sustainable Future	LP 1 Local Character and Design Quality
DM SD1 Sustainable Construction	LP 3 Designated Heritage Assets
DM SD 2 Renewable Energy and Decentralised Energy Networks	LP 5 Views and Vistas
DM SD 3 Retrofitting	LP 8 Amenities and Living Conditions
DM SD 4 Adapting to Higher Temperatures and Need for Cooling	LP 10 Local Environmental Impacts, Pollution and Land Contamination
DM SD 5 Living Roofs	LP 13 Green Belt, Metropolitan Open Land and Local Green Space
DM SD 6 Flood Risk	LP 14 Other Open Land of Townscape Importance

<p>DM SD 7 Sustainable Drainage DM SD 8 Flood Defences DM SD 9 Protecting Water Resources and Infrastructure DM SD 10 Water and Sewerage Provision</p> <p>Protecting Local Character DM OS 2 Metropolitan Open Land DM OS 3 Other Open Land of Townscape Importance DM OS 4 Historic Parks, Gardens and Landscapes DM OS 5 Biodiversity and new development DM OS 6 Public Open Space DM OS 7 Children’s and Young People’s Play Facilities DM OS 8 Sport and Recreation Facilities DM OS 11 Thames Policy Area DM 10 Conservation Areas – designation, protection and enhancement DM HD 2 Conservation of Listed Building and Scheduled Ancient Monuments DM HD 4 Archaeological Sites HM HD 7 Views and Vistas</p> <p>Meeting People’s Needs DM TP 1 Matching Development to Transport Capacity DM TP 2 Transport and New Development DM TP 3 Enhancing Transport Links DM TP 6 Walking and the Pedestrian Environment DM TP 7 Cycling DM TP 8 Off Street Parking – Retention and New Provision</p> <p>Detailed Generic Policies DC 1 Design Quality DC 5 Trees and Landscape DC5 Neighbourliness, Sunlighting and Daylighting</p>	<p>LP 15 Biodiversity LP 15 Trees, Woodlands and Landscape LP 18 River Corridors LP 20 Climate Change Adaptation LP 22 Sustainable Design and Construction LP 24 Waste Management LP 30 Health and Wellbeing LP 31 Public Open Space, Play Space, Sport and Recreation LP 40 Employment and Local Economy LP 43 Visitor Economy LP 44 Sustainable Travel Choices LP 45 Parking Standards and Servicing</p>
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Supplementary Planning Documents and Guidance

- Design Quality (2006)
- Refuse and Recycling Storage Requirements (2015)
- Sustainable Construction Checklist (2016)
- Design for Maximum Access
- Listing Buildings
- Nature Conservation and Development
- Planning guidance for food and drink establishments
- Trees: Landscape Design, Planting and Care

- **Wildlife in Gardens**
- **Twickenham Riverside Conservation Area Statement (CA8)**
- **Twickenham Riverside Conservation Area Study (CA1)**

Appendix 2: Schedule of drawings and supporting technical documentation

- . 8.1 LANDSCAPE DRAWINGS
- . 8.2 MARBLE HILL HOUSE DRAWINGS
- . 8.3 SPORTS BUILDING DRAWINGS
- . 8.4 INTERPRETATION REPORT
- . 8.5 HERITAGE IMPACT ASSESSMENTS
- . 8.6 ARCHAEOLOGICAL IMPACT ASSESSMENT
- . 8.7 ACCESS REPORT
- . 8.8 TRANSPORT ASSESSMENT & STATEMENT
- . 8.10 PRELIMINARY ECOLOGICAL ASSESSMENT
- . 8.11 BAT SURVEY
- . 8.12 ARBORICULTURAL SURVEY
- . 8.13 GROUND INVESTIGATIONS - GEOTECHNICAL REPORT
- . 8.14 EXPLOSIVE ORDNANCE THREAT ASSESSMENT
- . 8.15 SOIL RESOURCE SURVEY
- . 8.16 SPORTS PITCH AGRONOMIC ASSESSMENT
- . 8.17 HISTORIC ENGLAND - MARBLE HILL HOUSE LANDSCAPE INVESTIGATIONS
- . 8.18 HISTORIC PLANTING ANALYSIS
- . 8.19 STABLE BLOCK & CAFE - STRUCTURAL REPORT & DRAWINGS
- . 8.20 STABLE BLOCK & CAFE - BOUNDARY WALL REPORT & PHOTOS
- . 8.21 STABLE BLOCK & CAFE - M&E STAGE 3 REPORT
- . 8.22 STABLE BLOCK & CAFE - ENVIRONMENTAL SUSTAINABILITY STATEMENT
- . 8.23 STABLE BLOCK & CAFE - CDM DESIGNERS RISK ASSESSMENT (M&E)
- . 8.24 STABLE BLOCK & CAFE - BRUKL OUTPUT DOCUMENT
- . 8.25 STABLE BLOCK & CAFE - SCHEDULE OF LUMINAIRES
- . 8.26 STABLE BLOCK & CAFE - M&E DRAWINGS
- . 8.27 STABLE BLOCK & CAFE - CATERING DESIGN
- . 8.28 STABLE BLOCK & CAFE - ACOUSTIC REPORT
- . 8.29 STABLE BLOCK & CAFE - NOISE IMPACT ASSESSMENT
- . 8.30 STABLE BLOCK & CAFE - ARCHAEOLOGICAL WATCHING BRIEF
- . 8.31 STABLE BLOCK & CAFE - LISTED BUILDING SCHEDULE OF REPAIRS
- . 8.32 STABLE BLOCK & CAFE - DESIGNERS HAZARD IDENTIFICATION & MANAGEMENT SHEET

- 8.33 STABLE BLOCK & CAFE - DESIGNERS MAINTENANCE & CLEANING ACCESS SCHEDULE
- 8.34 STABLE BLOCK & CAFE - AREA SCHEDULE
- 8.35 STABLE BLOCK & CAFE - OUTLINE SPEC A (NEW BUILDING)
- 8.36 STABLE BLOCK & CAFE - OUTLINE SPEC B (REFURBISHMENT)
- 8.37 STABLE BLOCK & CAFE - STABLE WALL ARCHAEOLOGICAL INVESTIGATION
- 8.38 STABLE BLOCK & CAFE - ANALYSIS OF CARTOGRAPHIC & VISUAL SOURCES
- 8.39 STABLE BLOCK & CAFE - DRAFT DESIGN & ACCESS STATEMENT
- 8.40 MARBLE HILL HOUSE - STRUCTURAL REPORT
- 8.41 MARBLE HILL HOUSE - LIFT APPRAISAL
- 8.42 MARBLE HILL HOUSE - ASBESTOS MANAGEMENT PLAN
- 8.43 MARBLE HILL HOUSE - COMPARTMENTATION REPORT
- 8.44 MARBLE HILL HOUSE - SAC REPORT
- 8.45 MARBLE HILL HOUSE - ARCHITECTURAL PAINT REPORT (2004)
- 8.46 MARBLE HILL HOUSE - PAINT REPORT (2016)
- 8.47 MARBLE HILL HOUSE - LIGHTING APPLICATION
- 8.48 MARBLE HILL HOUSE - RENDER REPORT
- 8.49 HISTORIC ENGLAND FORMAL FEEDBACK

Appendix 3: Pre-Application Feedback from LB Richmond Upon Thames

Meeting Note

Our ref 15627/IR/NBi
Date 06 March 2017
Present LB of Richmond upon Thames; English Heritage; J&L Gibbons; VHH Architects; Lichfields
Venue Civic Centre, 44 York Street, Twickenham, TW1 3BZ
Issued to Lucy Thatcher; Ronnie Ferlie; Mortimer McSweeney; Josh McCosh; Niamh Cronin; Neil Davidson; Iain Rhind; Nick Bishop

Subject **Marble Hill Parks for People: Pre-application Meeting 06-03-17**

1.0 Background

1.1 EH explained that the background to the Parks for People Heritage Lottery Fund bid, and that there is considerable risk of losing the Round 1 funding which has been set aside for the project if planning permission is not secured at the June Planning Committee or before.

2.0 Engagement

2.1 LB Richmond emphasised the need for the application to be supported by evidence of local consultation. VHH explained the extensive engagement which had taken place on the proposals and that this would be fully documented in the planning submission.

2.2 *Action:* EH to investigate how the contacts collected at consultation events can best be notified once the application has been validated – it may not be possible for EH to hand consultees' personal data directly to the LPA.

3.0 Stable Block justification: MOL

3.1 Lichfields will make the case that the proposed stable-block would be policy compliant, but also that it would meet the exceptional circumstances tests for development within MOL. EH confirmed that the stable block café is intended to be ancillary to the operation of Marble Hill House, and that EH would be happy to agree opening hours by condition.

3.2 *Action:* All references to the use of the site for weddings, including the proposed marque to the east of Marble Hill House, to be removed from the submission proposals, and a note added to the planning application cover letter to confirm this for the avoidance of doubt.

4.0 Stable Block justification: Heritage

4.1 The curtilage listed wall to the stable block has a 140mm lean over 1.74 along a 6m section. Buttressing the wall is unlikely to be effective over the longer term and reconstruction offers the opportunity to address this safety issue whilst enabling the construction of a viable extension which will cross-fund the maintenance of the Marble Hill estate, including the Grade I listed House and Grade II* Registered Park.

4.2 VHH noted that the wall is a party-wall structure with a lack of documented clarity on ownership, however the construction matches that of the stable block itself showing that the two are of equal age.

- 4.3 The age of the wall and its structural condition are detailed in the archaeological report by Prosser and a structural report by The Morton Partnership respectively. These documents were not available at the time when the pre-application submission was made, but they will accompany the planning application by way of justification for the proposed demolition.
- 4.4 Lichfields noted that demolition of curtilage listed structures requires clear and convincing justification under the NPPF, and that this will be provided in the planning submission. The case will be made that the reconstruction of the wall should be considered 'less than substantial' harm under paragraph 134 of the NPPF, and that this harm is decisively outweighed by the heritage benefits offered by the construction of the stable block extension, including sustainable revenue generation to address an annual maintenance deficit to a Grade I listed mansion and Grade II Registered Park.

5.0 Transport and Parking

- 5.1 Lichfields confirmed that the application will be accompanied by a transport report by Vectos which has modelled parking requirements based on the expected 16% increase in visitor numbers by 2020.
- 5.2 LB Richmond's preference is for parking survey dates and times to be specified to ensure robust data gathering (although not a validation requirement). EH offered to see if their parking meters could supply additional data to reinforce the parking assessment.
- 5.3 *Action:* Lichfields to review the methodology in discussion with Vectos and establish further liaison between Vectos and Mary Toffi (cc. Ronnie Ferlie) if necessary. EH to investigate the availability of parking data.

6.0 Amenity

- 6.1 VHH confirmed that the extract will vent through a vertical slatted panels in the north façade with the boiler flue sitting against the northern wall of the existing stable, painted black to look like a soil pipe. Services management will be covered in the Design and Access Statement by VHH.

7.0 Stable Block Extension: Preferred Design

- 7.1 VHH presented ten different design options which have been considered as a means of addressing amenity concerns regarding the height of the rebuilt stable block wall, previously shown as reaching a maximum of 4.8m.
- 7.2 The Council's preferred option to best address impacts on the historic wall and on the and neighbouring amenity was as follows:
- 1 The curtilage-listed wall will be rebuilt up to a datum height to of c2.8m, with the zinc cladding then rising to a height of c3.9m.
 - 2 The building footprint will sit parallel to the wall to create an even mono pitch running north-south on an orthogonal rather than tapering plan.
- 7.3 In reaching the preferred design it was acknowledged that the overall height had to be sufficient to accommodate kitchen ductwork internally - rooftop plant was not considered acceptable. The Council also indicated a preference for a greater proportion of solid brick to zinc cladding, which would be enabled by the 2.8m datum height.

- 7.4 VHH expressed concerns with the Council's preferred design, notably that the 2.8m wall with zinc cladding above may cause long term maintenance issues and was not the preference of the neighbours; also that the orthogonal design creates a less sympathetic relationship to the listed Stable Block. Nonetheless, it was agreed that the Council's preferences would be pursued in the submission design.

8.0 Other Planning Issues

- 8.1 LB Richmond advised that the Publication version of the Local Plan has been adopted by the Council for Development Management Purposes and should therefore be considered a material consideration.
- 8.2 Lichfields advised that the Open Space Statement and Health Impact Assessment would be covered within the planning statement rather than as standalone reports as requested in the pre-application advice. LB Richmond agreed with this approach and suggested that the Playing Pitch Strategy (2015) be reviewed to inform the text on open space within the Planning Statement.
- 8.3 VHH explained that it would not be possible to for the stable block extension to meet BREEAM excellent standards as required by the Local Plan, but that the application would be accompanied by the Sustainability Checklist and Sustainability Statement, setting out which sustainability measures could feasibly be incorporated into scheme. This approach was accepted by the Council.

02 FEB 2017

Environment Directorate



PLANNING

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Our ref: TP/DC/16/P0219/PREAPP

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Ms N. Halisch
English Heritage
Eastgate Court
195 – 205 High Street
Guildford GU1 3EH

Date: 31st January 2017

Dear Ms Halisch

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

Site: MARBLE HILL HOUSE AND PARK, RICHMOND ROAD, TWICKENHAM TW1 2NL

Proposal: REINSTATEMENT OF HISTORICAL LANDSCAPE; MAINTENANCE OF SPORTS FACILITIES; REPAIRS AND EXTENSION TO STABLE BLOCK; ALTERATIONS AND UPGRADE TO THE HOUSE (Pre-application advice).

I write in reference to your letter received by the council on 26th August 2016 and our meeting held on site on 10th October 2016. On the basis of the information submitted and discussed I have the following comments to make.

Site Description

Marble Hill Park, located on the southern side of Richmond Road (A305), consists of 66 acres of riverside parkland, and accommodates the Palladian villa, Marble Hill House. The main building is Grade I; the Park is Grade II* and the Stable-Block, White Lodge, Ice House are Grade II statutory listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for their special architectural or historic interests. The property was designated as a Listed Building in September 1952 and the site is subject to the following additional constraints:

- Metropolitan Open Land
- Other Site of Nature Importance
- Protected View (Indicative Zone) DMP:
 - No.4 View from near Ham House to Orleans
 - No.5 View to Marble Hill House (north)
- Protected Vista (Indicative 20 metre Buffer) DMP
- Public Open Space DMP: Site: Marble Hill
- Thames Policy Area DMP: Thames Policy Area
- Archaeological Priority Area
- Twickenham Riverside Conservation Area

- Proposal Site T18 Marble Hill Park
- The southern part of the site is within flood zone 3

There are neighbouring designated heritage assets that would be affected by the proposals, notably the Grade II* Southend House.

It is recommended that you refer to our Local Development Plan webpage (please see attached link here http://www.richmond.gov.uk/final_development_management_plan_adopted_nov_2011.pdf) for further information on the policy constraints covered in this pre-app letter.

Additionally, the Council's cabinet agreed at its meeting on 13 December 2016 to adopt and use the Publication Local Plan for determining planning applications and development management purposes. Consultation on this Publication Local Plan is currently on-going until 15 February 2017. All of the consultation and supporting documents are now on the publication webpage, which can be found below:

http://www.richmond.gov.uk/home/services/planning/planning_policy/local_plan/local_plan_review/local_plan_publication.htm

As part of the consultation arrangements, site notices have gone up around the site specific proposals; your attention is drawn particularly to Metropolitan Open Land, Local Green Space, Other Open Land of Townscape Importance and Other Sites of Nature Importance.

Planning History

The site has been subject to various planning applications, listed building consents and tree works applications. These include applications for temporary events and the following:

04/2487/COU: To expand the use of Marble Hill House to allow for the use as a venue for functions and civil wedding ceremonies on ground and first floor (subject to license) outside existing opening hours. **Granted permission 21/04/2005**

04/0979/FUL: Erection of Marquees on Rear Lawn for Not More Than 16 Events per Year. Approval Sought For Trial 3 Year Period. **Withdrawn by the applicant 17/05/2004**

94/0236/LBC: Relocation of Shop, Control Room and Toilets on Ground Floor and Re-establishment of Existing Doorway. **Granted permission 12/05/1994**

Planning Policies

National Planning Policy Framework – NPPF (2012)

- Section 1 – Building a strong, competitive economy
- Section 4 – Promoting sustainable transport
- Section 7 – Requiring good design
- Section 11 – Conserving and enhancing the natural environment
- Section 12 – Conserving and enhancing the historic environment

Core Strategy (2009)

- CP1 - Sustainable Development
- CP2 - Reducing Carbon Emissions
- CP3 - Climate Change - Adapting to the Effects
- CP4 - Biodiversity

- CP5 - Sustainable Travel
- CP6 - Waste
- CP7 - Maintaining and Improving the Local Environment
- CP10 - Open Land and Parks
- CP11 - River Thames Corridor
- CP16 - Local Services/Infrastructure
- CP17 - Health and Well-being
- CP19 - Local Business
- CP20 - Visitors and Tourism

Development Management Plan (DMP 2011) and Publication Local Plan (PLP 2017)

DM Policies (Currently in use)	LP Policies (Currently in consultation)
<ul style="list-style-type: none"> • DM DC1 - Design Quality • DM DC4 - Trees and Landscape • DM DC5 - Neighbourliness, Sunlighting and Daylighting • DM DC9 - Planning Application Checklist • DM EM2 - Retention of Employment • DM HD1 - The protection and enhancement of Conservation Areas • DM HD2 - Conservation of Listed Buildings and Scheduled Ancient Monuments • DM HD4 - Archaeological sites • DM HD7 - Views and Vistas • DM OS2 - Metropolitan Open Land • DM OS3 - Other Open Land of Townscape Importance • DM OS4 - Historic Parks, Gardens and Landscapes • DM OS5 - Biodiversity and new development • DM OS6 - Public Open Space • DM OS8 - Sport and Recreation Facilities • DM OS11 - Thames Policy Area • DM SD1 - Sustainable Construction • DM SD2 - Renewable Energy and Decentralised Energy Networks • DM SD5 - Living Roofs • DM SD4 - Adapting to Higher Temperatures and Need for Cooling • DM SD6 - Flood risk • DM S11 - Encouraging New Social Infrastructure Provision • DM TP2 - Transport and New Development • DM TP3 - Enhancing Transport Link • DM TP6 - Walking and the Pedestrian Environment • DM TP7 - Cycling • DM TP8 - Off Street Parking - Retention and New Provision 	<ul style="list-style-type: none"> • LP 1 Local Character and Design Quality • LP 3 Designated Heritage Assets • LP 5 Views and Vistas • LP 8 Amenities and Living Conditions • LP 10 Local Environmental Impacts, Pollution and Land Contamination • LP 13 Green Belt, Metropolitan Open Land and Local Green Space • LP 14 Other Open Land of Townscape Importance • LP 15 Biodiversity • LP 16 Trees, Woodlands and Landscape • LP 18 River corridors • LP 20 Climate Change Adaptation • LP 22 Sustainable Design and Construction • LP 24 Waste Management • LP 30 Health and Wellbeing • LP 31 Public Open Space, Play Space, Sport and Recreation • LP 40 Employment and local economy • LP 43 Visitor Economy • LP 44 Sustainable Travel Choices • LP 45 Parking standards and servicing

Supplementary Planning Documents

- Design Quality (2006)
- Refuse and Recycling Storage Requirements (2015)
- Sustainable Construction Checklist (2016)

Supplementary Planning Guidance

- Design for Maximum Access
- Listed Building
- Nature Conservation and Development
- Planning guidance for food and drink establishments
- Trees: Landscape Design, Planting & Care
- Wildlife in Gardens

Conservation Area Documents

- Twickenham Riverside Conservation Area Statement (CA8)
- Twickenham Riverside Conservation Area Study (CA1)

Thames Landscape Strategy

Planning Consideration

The main issues to consider in a formal application will include:

- a. Land use
- b. Impact on MOL and Views
- c. Design impacts on the heritage assets
- d. Impacts on transport and highways including parking
- e. Potential effects on the amenity of the neighbouring residents
- f. Sustainability requirements
- g. Trees and Ecology and Other Matters

Land Use

Policies –

DMP: DM EM2; DM OS2; DM OS3; DM OS4; DM OS6; DM OS8; DM OS12; DM SI1; DM TC4

Core Strategy: CP10; CP16; CP19; CP20.

Superseded by the following: LP 13; LP14; LP 27; LP 31; LP 40; LP 43 of the PLP

Summary of policies: To allocate and maintain the use of land effectively and resist inappropriate developments where designated land use exists or where land has been reserved for a particular purpose.

Key justifications identified for the proposed scheme, as stated in the submitted documents are that “neither the grounds nor the House meet their potential, as a destination or a local attraction”, and that “it is desirable that the café and shop are obvious to those in the wider park and coming to the house”.

Officers are satisfied that the proposed development would retain and potentially increase employment opportunities in the Borough. It is also recognised that there are opportunities to support and link with other local small businesses. In line with Policy CP19, the proposals comprise a development which meets modern business needs and support the tourist industry compliant with CP20.

Policy LP 40 mentions that Marble Hill House as a historic site offer opportunities for economic spin offs as well as making a contribution in supporting a high quality and unique environment and this is obvious in the proposed scheme, whereby the benefits of the developments are obvious and well detailed. Overall, the expected use of an integrated estate would support local growth and based on the submitted future projections of 16% by 2020, the improvements would have benefits that should be afforded significant weight in the assessment of the application.

Impact on MOL & Views

Under policy DM OS2, the borough's MOL will be protected and retained in predominately open use. It is recognised that there may be exceptional cases where appropriate development, such as small scale structures is acceptable, but only if it:

- *Does not harm the character and openness of the MOL and*
- *The use is linked to the functional use of the MOL or supports outdoor open space uses*

The site is highly sensitive, with the park being within a conservation area, the Thames Policy area, designated MOL, and Marble Hill House being Grade I listed and a landmark building, with protected views. Policies CP7, CP10, HD1, HD2, OS2, and OS11 address such designations, and require developments to:

- *Protect and retain their open character, appearance and setting*
- *Protect the settings, views and vistas to and from such historic landscapes*
- *Preserve their historic interest*

Policies CP11, DM OS4 and DM HD7 require views and vistas to and from historic parks and gardens, the River Thames Corridor, and views indicated on the Proposals Map to be protected and enhanced. Developments that have an adverse impact upon such areas will not be permitted.

PLP Policy LP 13 states that development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt or Metropolitan Open Land.

The majority of the works proposed are compliant with the above policies, supporting outdoor open space uses and will positively enhance the setting of the historic buildings and the historic landscape. Improvement of the openness and character of the Public Open Space including measures to allow for convenient access for all residents will be encouraged where appropriate and this is reflected in the scheme.

However, the extension to the stable block does result in additional footprint and built development within MOL which would harm its character and openness. Whilst this has been tucked in between the existing stable block and boundary wall to reduce its intrusion into the landscape, it is nonetheless contrary to policy and harmful. This harm would have to be weighed in the balance with the benefits of the scheme.

There are a significant number of views of Marble Hill House. The only significant new build to extend the stable block would fall well outside of the protected buffer zone for such views and be relatively discreetly hidden behind trees in this strategic context. Nonetheless, photomontages showing the visibility of the stable block extension in wider views may be helpful to illustrate the impact of the proposals.

Design and Access

Policies –

DMP: DM DC1; DM H1; DM HD2; DM HD7; DM OS2; DM OS3; DM OS4; DM OS6; DM OS8; DM OS11;
DM SI1

Core Strategy: CP7; CP 10; CP 11

Superseded by LP 1; LP 3; LP 5, LP 13; LP 14 LP 31 of the PLP

Summary of policies: To ensure good and inclusive design; protect and enhance heritage assets in the Borough.

The Listed Building SPG states that the preservation of Listed Building does not necessarily mean that the buildings have to be preserved exactly as they are now but it does mean that alterations and extensions must be carried out in a sympathetic manner using appropriate materials and techniques.

The Design for Maximum Access SPG states that landscaping / planting should not obstruct, but can be used to enhance the environment for those with restricted mobility. Outdoor changes in level should be avoided, especially at entrances and exits to buildings, where this is impossible, a ramp no steeper than 1:20 should be provided for prams, pushchairs, wheelchairs and trolleys. Pedestrian routes should be at least 2m wide and free of obstacles.

If site constraints are such that a steeper ramp is required, it should be no steeper than 1:15 if flights are not longer than 10m or not steeper than 1:12; if individual flights are not longer than 5m; steps should be provided as well. Ramps should be 1.8m wide to allow wheelchairs and prams to pass, should have non-slip surface, a 100mm kerb to denote the edge, continuous handrails on both sides and a level platform of 1.8m long at the beginning and end of the platform.

Lifts should be provided in buildings of more than one storey, they should stop precisely at floor level and entrance doors should have 830mm of clear opening width (with a minimum of 800mm), doors should open and close slowly and reopen in the event of difficulties. Touch sensitive, illuminated controls should be provided at a height suitable for wheelchair users, digits should be embossed and if possible audible along with visual information. The internal dimensions of lifts should be 1.1m wide by 1.4m deep of unobstructed space. A lift 1.5m x 1.5m deep or more (standard 12 person) would allow a standard wheelchair to turn at 180 degrees. An unobstructed space of 1.5m x 1.5m should be available in front of the lift.

Signage / information consisting of internal and external signs should be regarded as part of any design; some signs may need planning consent (please enquire if in doubt). Suspended signs should allow a minimum headroom of 2000mm. All signs indoor or outdoor, should be large, clear, legible and distinguishable from the background, they should be well located, readily visible and well lit at height visible to children and wheelchair users. Requirements for specific uses in older buildings should attempt to improve access and facilities where possible. If a fully accessible building cannot be achieved then accessible parts and routes should be aimed for.

Internal alterations to Marble Hill House to include a lift and other repairs:

- Officers recognise the need and benefits which is consistent with the guidance and agree that overall the public benefits outweigh the harm arising from the works proposed to Marble Hill House
- Age of the building can impose some constraints, these should be illustrated on plans where possible to justify the overriding of any policies
- Preferred location in option D will result in minimum impact on the fabric and is more feasible, this option for a platform lift within the closet rooms is encouraged
- Materials and design should be carefully considered
- Close matching features should be used where original cannot be obtained

- Repaired items should blend into existing fabric without being noticeably different
- Reclamation, repair and re-use over new wherever possible.

Landscaping at the stable block:

- Raised lawn beds add no landscape merit/value to the host building and their removal would improve landscaping and access
- It would also provide a better setting to the stable block
- It would improve connectivity, integrity and remove fragmentation of the estate

Improving the setting to the stable block by providing well designed hard landscaping / paving and seating would be greatly beneficial to visitor's amenity, ergonomics and aesthetic values.

Pleasure grounds landscape:

- The effect of this proposal must be illustrated and reviewed in a formal application.

Removal of toilet block, Chinese Shelter and sport hut:

- A redundant buildings which adds no significant value and can be an improvement
- Mostly in poor conditions but present opportunities for re-instatement of original features without building on previously undeveloped plots
- Opening up of views and maximising the availability of unobstructed landscape is consistent with MOL strategies and Thames Policy Area.

Creation of play area:

- Improvement to boundary treatment is welcomed
- Reduce prominence and park integration is ideal
- Area would be more subtle to surroundings.

Maintenance/improvement of sports facilities:

The open space context brought forward, states that Marble Hill Park is a unique property in English Heritage's portfolio due to the provision of pitches and sports facilities. This can increase the pressure on the heritage assets and restrict their appreciation by the general public. Any enhancement to sport facilities must illustrate that there would be no undue harm to the historic landscape and the contrasting uses (i.e. sportive and relaxation) can coexist in harmony. It is stated that the juxtaposition of sport and heritage is the most appealing aspect of Marble Hill but the demographic, statuses and leisure requirements of users between the two uses might not necessarily be the same and their different needs must be achieved without compromising on one or the other.

It is appreciated that there is a need to provide separate changing facilities for male and female users to increase user opportunities. The concept of providing flexible changing rooms is welcomed and future projection of use must be taken into consideration as stated in the appendix. Whilst the changing rooms form part of the curtilage of the listed building, the alterations are mainly internal and as such do not affect its setting nor the overall relationship with other structures / buildings or general landscaping within the park.

Extension of the stable block:

Externally the C19 Stable Block retains its architectural form and massing. It is a two storey brickwork clad symmetrical block, with a central archway leading to a rear courtyard. At the rear of the stable block is a single storey hipped outrigger facing westward on either side of the archway.

The Stable Block is located on the west side of Marble Hill Park and its front elevation of the faces onto the front parkland of Marble Hill Park. As a discretely located ancillary building it contributes to

the setting of Marble Hill House.

It is stated that the preferred option C would minimise the physical interference with the existing stable block and officers consider that it has been carefully designed in a contemporary idiom as a rear courtyard café with associated facilities neatly tucking in below the eaves of the rear hipped roof. Such proposals require minimal intervention to the structure and fabric of the listed stable building.

Notwithstanding this, the proposal to demolish the existing brickwork boundary wall for the length of the café / kitchens and constructing a new wall on this boundary line approx. 2m above the current level of the existing boundary wall causes unjustified harm. This wall is not only a curtilage structure but listed in its own right and the demolition proposed is considered to result in substantial harm to this designated heritage asset. As policy states, where a proposal leads to substantial harm or total loss of significance of a designated asset, the LPA should refuse consent unless the harm is necessary to achieve substantial public benefits that outweighs the harm; and the scheme meets the exceptions in the NPPF.

It is strongly recommended that alternative options are explored for this element of the scheme. Should an application be submitted that retains the demolition of the boundary wall it would be useful for it to be accompanied by evidence that such alternative options have been considered and the reasons why they have been discounted.

It is important to note that on the other side of the western boundary brickwork wall from the Stable Block stand No.29 (Montpellier House), No.30 (South End House) including walls, piers, railings and gazebo in grounds all designated Grade II*.

The relationship with the Grade II* South End House (which is older than the stable block) to the other side of boundary must be preserved and the wall forms part of the general setting between the two properties and hence part of the historic fabric of the area and is integral to the relationship between the house and the park.

The possible effect of demolishing the existing boundary wall and erecting the new café / restaurant with a wall which would be approx. 2m higher for its full length of some 29m would result in a development of such height, mass and bulk as to be visually prominent, highly obtrusive and overbearing in this very sensitive location. The effect will be seriously detrimental to the setting of Southend House. Officers consider that the resulting harm to the setting of Southend House will be 'less than substantial' to this designated heritage asset but it would cause substantial harm to residential amenity.

Additionally, ownership of the wall must be established as on the basis that the wall is part of the structural entities of South End House; its demolition would not be warranted as it would remove a vital heritage component of a Listed Building which is otherwise not subject to other alterations to mitigate such loss.

Whilst it is appreciated that the mono-pitch roof is designed to slope down from a higher wall so as to ensure a subservient relationship with the stable block and that the separating distance from the main building at South End House is shown to be some 24m care should be taken to incorporate traditional with new and the boundary treatment which must remain consistent with the overall character and quality of the estate; therefore, more weight should be given to its value and significance.

Officers acknowledge the merits of the proposed scheme and the conscientious approach taken by

English Heritage. These would consolidate the use of the house, park and garden to maximise potential and generate income for the up-keeping and maintenance. However, the design of this part of the scheme has raised significant concerns in terms of its ability to protect and enhance the heritage assets. The contextual basis of the design lacks sufficient justification in this case due to the astringency associated with the siting of the proposed structure which raises questions with regard to the compatibility and integrity of such a contrasting built form. This can cause some alienation and disintegration of valuable components of key elements of heritage importance. In this respect a design of this nature can work better as an individual entity which does not compromise of the existing historic fabric within the curtilage of the listed buildings. Overall, whilst the public benefits of the scheme are recognised and welcomed, it is not considered that they sufficiently justify the harm identified to the heritage assets. Any submission would need to demonstrate how the scheme meets the exceptions outlined in paragraph 133 of the NPPF. As policy advises, substantial harm to Grade II listed buildings and Parks / Gardens should be exceptional.

It is recognised that there are opportunities to make more efficient use of the available space at external rear and side of the host building and a possible reconfiguration of the ground floor might further unlock its potential through making use of the high value locations facing east and south, with the advantages being unobstructed view across the front parkland and the sunny southerly aspect with views across the river. New facilities can be created in a less bulky and lower profile which can be offset from the wall. Whilst the condition of the brickwork boundary wall is locally poor and it is certainly in need of localised repair, there is insufficient justification for its complete demolition and replacement for the length of the café / kitchen. It is considered that an alternative design will be achievable which does not cause such harm to the heritage assets and it is strongly recommended that such an alternative design solution be explored.

Residential Amenity

Policies –

DMP: DM DC5

Superseded by LP 8 of the PLP

Any development must protect adjoining properties from unreasonable loss of privacy, pollution, visual intrusion, noise and disturbance. To protect privacy, residential development should be sited a minimum of 20m between the main facing windows of habitable rooms. Further, with respect to sunlight and daylight the Council is guided by the BRE Site Layout, Planning for Sunlight and Daylight, and in Sun on Ground Indicators. Any submission must demonstrate compliance with the above policy and relevant guidance.

The principal issue to arise from the scheme will be light, noise, privacy and visual impact of the scheme. The advice contained within this letter is without the benefit of a site visit to adjoining properties, and therefore may alter if and when an application is submitted.

It is anticipated that the main issue in terms of residential amenity impact would be with the relationship at boundary between South End House on Montpellier Row, the Stable Block extension and the extended use of the café so close to the boundary. With a proposed eaves height of roughly 4.9m, the situation at the boundary would introduce noticeable change in the setting between the two properties despite the gap from the elevations of South End House.

There needs to be an accurate portrayal of the degree of harm to the amenity space and the gazebo within the grounds of South End House. For the sake of transparency, it is recommended that any future application be accompanied by a cross section showing the relationship of the rear elevation

of South End House with the replacement wall. Further evidence could include a landscape and visual impact assessment (supported by illustrations or photomontage). However, with the details provided in the submission, the currently proposed relationship is unacceptable, appearing unduly intrusive and creating an unacceptable sense of enclosure.

Together with the boundary trees and planting, the boundary wall provides a crucial sense of scale and physical enclosure to the garden, which greatly affects the way South End House and its gazebo are appreciated. The significance of the brickwork boundary wall, gazebo, trees and vegetation in its garden are important to the sense of enclosure, seclusion and privacy to South End House. Given the height of the proposed replacement boundary wall is shown as being 4.891m high on the submitted drawings and it will be 29m long flanking the proposed kitchen and café, by comparison the proposed height, mass and scale of the replacement wall would stand out starkly and prominently against the sky. It would be highly prominent and visually obtrusive when considered in the setting of South End House, its garden and gazebo and would cause some harm to residential amenity.

For noise generating proposals in close proximity to existing noise sensitive development an acoustic assessment is typically required. This can include new plant and equipment, new games / play area, new external seating area close to noise sensitive receptor. The Council's Environmental Health Officer has indicated that an acoustic assessment and background noise survey are not necessary for validation but notwithstanding this, given the increased intensity of use it would be prudent for such evidence to accompany the application and it would assist local residents in assessing the extent of the potential harm to their amenity and as such is to be recommended.

In particular it is noted that the documents indicate that the café would be a destination in its own right and this would imply longer opening hours. It has been suggested that it may also host weddings which would consequently imply music and noise late into the evening. Clarification of the opening hours and the applicants intentions in this regard should be provided so the impact can be appropriately assessed and its use conditioned if necessary in the event of a successful application.

It is recognised that detailed technical information may not be available to the applicant at this stage. However, any plant or equipment installed on site to be used in conjunction with the purpose of the application must be suitably located (indicated on submitted plans), acoustically enclosed or treated and / or vibration damped. A written undertaking to carry out such works may be sufficient at this stage. Details must be provided with the application of the range of food to be provided and method of cooking intended to address ventilation and odour.

Transport and Parking

Policies –

*DMP: DM TP2, DM TP3, DM TP6, DM TP7, DM TP8 of the DMP
CP 5 of the Core Strategy
Superseded by: LP 44; LP 45 of the PLP*

Summary of policies: To reduce transport related impacts of developments, management of traffic and car parking on site, maintain and develop transport infrastructure and encourage sustainable transportation.

The following information will be required in any formal application to address transport related issues:

- Transport Assessment and Travel Survey indicating:
 - The amount parking that is used during busy times and how much would remain for

- use upon expansion of the site uses
- Clear details of what car parking would be required for the expanded usage of the house and park
- Travel surveys of staff and visitors would be required with busiest times for the site indicated
- Projection / estimation of proposed usage to be detailed
- Opening hours for the restaurant / café
- It is stated that the restaurant would ideally to be a destination in itself; therefore, a projection of the number of car generated trips must be prepared for the worst case scenario
- Expanded usage of the site in general for larger events must also be included in the Travel Survey. Situations like the Soho House event in the summer which generates a number of complaints in terms of traffic management and the effect on Richmond Road and local residents must be avoided and feasibility studies undertaken
- Draft Construction Method Statement is required
- Any new proposed car parking areas would normally need to be screened from adjoining residential properties to prevent the transmission of noise. Details of such proposals should be submitted with the application.

Sustainability

Policies --

DMP: DM SD1; DM SD2 of the DMP

Core Strategy: CP1; CP2

Superseded by LP 22 of the PLP

SPD 'Sustainable Construction Checklist'

Policy LP 22 of the PLP requires developments to achieve the highest standards of sustainable design and construction in order to mitigate against climate change. An Energy Statement is required and this must demonstrate how the energy requirements will be met in line with the Energy Hierarchy; this is in line with The Mayor of London's approach to reducing carbon dioxide emissions in the built environment:

- *the first step is to reduce energy demand (be lean)*
- *the second step is to supply energy efficiently (be clean) and;*
- *the third step is use renewable energy (be green).*

Policy LP 20 states that new development, in their layout, design, construction, materials, landscaping and operation, should minimise the effects of overheating as well as minimise energy consumption in accordance with the following cooling hierarchy; the proposed scheme shows strong elements which complies with this overall.

All new developments should include measures capable of mitigating and adapting to climate change to meet future needs, and reduce carbon dioxide emission.

All schemes should complete the Sustainable Constructions Checklist; they should meet BREEAM excellent, and should demonstrate that the scheme achieves a 35% carbon reduction target beyond Part L 2013 of the Building Regulations. Further, any flat roof over 100m² should provide a green roof to improve the sustainability credentials of the scheme.

Within your pre-application submission, feedback was requested on the use of a sustainability statement in lieu of a BREEAM assessment. A BREEAM pre-assessment is a validation requirement

for any new non-residential buildings over 100m² and so would be necessary for the stable block extension. BREEAM comprises a national environmental assessment methodology and assessments are produced by accredited BREEAM assessors, meaning that the LPA can rely on what has been submitted and it provides a level playing field for all developers in the borough. Such an assessment is the only way of demonstrating compliance with the relevant policies. On the basis that the proposed café / restaurant falls under these considerations but the scheme cannot meet the standards outlined above, full justification should be given at the time of the application. The sensitivity of the location and constraints on use of renewable technologies as a consequence would be taken into account.

Ecology

The following documents will be required in a formal application:

- A Preliminary Ecological Appraisal and any further surveys as appropriate
- Details of any new external lighting proposed. Whilst details can usually be conditioned, if there is any significant lighting proposed then an external lighting scheme including plans, light specs, a horizontal lux contour map (vertical as well if near tree vegetation) may be required at application stage
- A landscape plan showing plans, specs, species, and maintenance plan
- An ecological enhancement plan including specs, aspects, heights, locations.

Trees

It is recommended that improvement of the park needs to be done in line with the tree stock:

- Any trees of significance in the landscape will be retained as landscape feature and historical reference points
- It has been suggested that there would be controls on species such as Sycamore. Whilst it is accepted that Sycamore is not native, it is naturalised and therefore should not be eradicated from the landscape. Trees should be measured on their significance and landscape value, rather than species.
- A full arboricultural impact assessment is required with a formal submission.
- Option A - The kitchen area extends towards a mature tree and therefore this option is not preferable unless the construction design addresses the impact
- Option B - The reduced size of the kitchen area will improve the relationship
- Option C - The position of the sub-station appears to be in the RPA of a mature tree and therefore does not have the support of the tree officer.

Flooding

DM SD6 aims to guide development to areas of lower risk. Leisure uses are categorised as 'less vulnerable uses', and within Flood Zones 3a, developments should be accompanied by a Flood risk Assessment and Sequential Test. The southern part of the estate is within flood zone 3. The Environment Agency advise that prior written consent from the Environment Agency is required for proposed works or structures, in, under, over or within 16 metres of the landward side of the tidal flood defences.

The Environment Agency offers Pre-planning application enquiry giving preliminary advice relating to a specific plot of land. This includes free preliminary opinion on what environmental constraints may affect your proposed development and how to avoid or mitigate any identified environmental impacts. There is also a charged advice service for any further discussions you might want about

your proposed project. Please see <https://www.gov.uk/government/publications/pre-planning-application-enquiry-form-preliminary-opinion>

Validation

It is noted that your submission included preliminary local validation requirements, including:

- Application form and plans
- Heritage Statement
- Room by room schedule of works & External schedule of works
- Transport Assessment and Statement (to include travel survey data)
- Community Engagement Report
- Acoustic assessment
- Odour assessment
- Energy report for the stable block
- Archaeological Statement
- Tree Survey
- Arboricultural impact Assessment and Method Statement
- Flood Risk Assessment
- Statement on SuDS
- Sustainable Construction Checklist for the stable block
- Landscaping scheme
- Archaeological Statement
- Preliminary Ecological Appraisal, mitigation and enhancement measures
- CIL form

Officers agree that these identified documents should be submitted. Given the size of the site, the application would be classed as a major and so for validation, the following will also be required:

- Design & Access Statement
- Planning Statement
- Open Space Assessment
- Health Impact Assessment
- Draft Construction Method Statement
- BREEAM Pre-Assessment for the stable block extension

Officers would further recommend:

- Photomontages showing the impact of the proposals on protected views and vistas
- Photomontage to illustrate the impact of the Stable Block on Southend House. Whilst this is not a validation requirement, such photomontages are particularly useful to assist the public and members in understanding the proposals
- Details of materials for the boundary wall
- The Community Engagement Report should summarise the engagement undertaken, the feedback received and it is recommended that it also include a commentary explaining how the proposals have evolved (if applicable) directly in response to that feedback. It is strongly recommended that a pre-application consultation approach is made directly to the residents of Southend House.
- Justification for the stable block extension which may include viability information.

Please refer to the Local Validation Checklist for more information (http://richmond.gov.uk/local_validation_checklist_april_2015.pdf).

Summary

The many benefits of the scheme are acknowledged and welcomed. However, taken on its individual merits the Stable block extension would not be supported by officers. Officers would strongly encourage the applicant to explore alternative design solutions to minimise the harm caused by this element of the scheme.

Overall the package of proposals has significant benefits which would have to be weighed in the balance against the identified harm caused by the Stable Block extension if they were to be submitted as a single application.

In order to undertake this balancing exercise, the purpose of the stable block extension needs to be fully justified. If this is the enabling development that is necessary to secure the benefits of the scheme, this would need to be demonstrated.

The stable block extension would lead to substantial harm to the boundary wall and less than substantial harm to the setting of Southend House. Para's 133 and 134 of the NPPF are therefore applicable and on the basis of the information submitted, officers are not convinced that there are substantial public benefits that could not be achieved without the stable block extension that outweigh the identified harm.

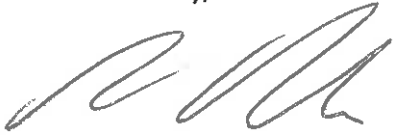
Should any future application be recommended for approval, it would be reported to the Planning Committee given that the stable block extension represents a departure to the development plan. In that event, clearly there is always a risk in coming to such a balanced judgement that a different conclusion may be reached by the Committee members. The applicant will need to consider the risks and come to their own conclusions in whether to submit the proposals as a single application or two.

Without prejudice

Any given advice by Council Officers from pre-application enquiries does not constitute a formal response or decision of the Council with regard to future planning consents. Any views or opinions expressed are given in good faith and to the best of ability without prejudice to formal consideration of any planning application, which was subject to public consultation and ultimately decided by the Council. You should therefore be aware that officers cannot give guarantees about the final form or decision that will be made on your planning or related applications.

Although the advice note will be brought to the attention of the Planning Committee or an officer acting under delegated powers, it cannot be guaranteed that it will be followed in the determination of future related planning applications and in any event circumstance may change or come to light that could alter the position. It should be noted that if there has been a material change in circumstances or new information has come to light after the date of the advice being issued then less weight may be given to the content of the Council's pre-application advice of schemes. You are also advised to refer to local and national validation checklist on the Council's website.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'R Angus', written in a cursive style.

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