# MAYBOURNE

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FAO Director of Environment and Community Services

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Twickenham TW1 3BZ 30th Sept. 2018

**Planning Application 18/2977/FUL Marble Hill**

**EXPERT OVERVIEW REQUESTED BY LOCAL PEOPLE**

Dear Sir,

We were asked a year ago by many local residents to provide a professional opinion on English Heritage's first Planning Application. They found it difficult to interpret the large amount of documentation, and many Policy requirements, and how they matched likes and dislikes were not known. People were unclear on what was actually controllable, but they were clear on what they did not like. We explained the technical and Policy implications of the application and how this compared with what was hoped for. Our conclusion was that there were a range of problems with the submission.

Things have moved on considerably and it was felt it would be objective and even handed to revisit the problems to ascertain whether the revised application addresses and cures them and how this meets National Planning Policy.

English Heritage and representative residents in adjoining roads and other park users have relayed their views and some working party and steering group meetings were attended.

Last year's criticisms were:

* Traffic Congestion and Danger
* Pollution
* Impact of concurrent events
* Cafe restaurant extension, noise and odour
* Tree loss and tree planting
* High Landscape Impact and unclear Justification
* Threat to endangered species
* Heritage aspects ignored
* Application material changes
* Lack of Conservation rigour

The application was withdrawn and in the ensuing time local people have been engaged in closer dialogue with English Heritage. There was user-need feedback, and some people researched the house history and landscape themselves.

The beneficial features of the new application (with comments) are:

**Heritage Assets**

There is a notable improvement in analysis compared with the deficiency last time. The appearance, history and context of the group of buildings adjoining, in Montpelier Row, is well examined and good weight is now given to their value in the urban context.

The architectural value of Marble Hill House is now not the only issue considered. Montpelier Row's history, predating the house, is relevant to Twickenham's evolution in the 18th century. This is taken into account and proposals changed.

**Stable block/coach House**

Containment of the cafe within the existing building is now proposed. This is in contrast to the previous plan for extensive new building onto the boundary at considerable height directly opposite the 18th century South End House and Garden. The change removes visual and incompatible intrusion on adjoining Listed buildings of great importance to Twickenham's history. We gather the new proposals still achieve the required business profile. Drawing 581-PL-S03G now shows external dining moved from west to east of the building with levelled land, bulb planting and views across to the cricket and the historic house. This new arrangement is more attractive, appropriate to summer use and leaves trees that were originally scheduled to be removed, now preserved.

It preserves the established and historic visual relationships between Marble Hill House, South End House, gazebo, 18th century gardens and the coach house by avoiding the visual intrusion from any angle of incongruous new build.

**Disturbance to neighbours in Montpelier Row.**

There is a major change of eliminating new building (new cafe) from the rear of the stable block. This leaves this area a quiet and public-free zone without disturbance to neighbours and meets an overwhelmingly voiced opinion of adjoining residents. It also preserves tree coverage. The acoustic analysis report is now credible, indicating a sound footprint at peak times that does not impinge on South End House use of its garden. The move of the proposed kitchen, shown on the boundary in the previous application, back to its original position with new extracts to the latest standards should ameliorate any odour. Very importantly the Listed wall is no longer demolished.

**Traffic**

The Traffic report now indicates a planned reduction of approximately 25% visitor load. This is significant. We originally expressed concerns over adequacy of parking, and high pollution. Section 2.16 of the report now submitted notes the site is within acceptable walking distance of public transport and mass parking in Richmond and Twickenham. This was a point that local people emphasised at working parties, pointing out the gains to shopping areas if event visitors were encouraged to park there and walk.

Section 4.7 shows a drop in the number of planned large events to be replaced by medium events of 300 persons maximum. Taken with the statement in 6.26 that no coaches will be admitted or permitted, this addresses a real concern.

In considering the current reports of Orleans Road congestion and Montpelier Row's experience of miss-directed or "lost" trucks etc perhaps thought could be given by the Council to mitigating measures. Some of this problem may be the reliance on sat nav.

Council Highways could consider installing better signage to Montpelier Row and Orleans Road that clearly bans inappropriate vehicles, gives fair warning of cul de sac and lack of access to the Park. It may consider it should contact sat nav agencies for remedy. On its, part, English Heritage states it is to improve the entrance signage on Richmond Road which at present results in overrun of entrances, exacerbating the situation..

**Pollution**

There was great concern expressed in our letter last year over pollution. particularly in Richmond Road. The Borough's Pollution department recently produced new figures that indicate pollution in Richmond Road has now fallen below the Borough maximum benchmark. Its designation as a "low pollution" route is important. The proposed reduction in number of vehicles in the park for events should assist the protection. The root cause of high level of pollutants is the school traffic idling, the stop-start at traffic lights and gyratory point, through road to Richmond, idling vehicles, acceleration and deceleration and diesel engines. These features already exist and the park proposals now make little if any difference to average levels, particularly bearing in mind the impact next year of the nearby new Lidl store and school in Richmond Road..

**Club facilities**

The application shows there is now club meeting facilities in the coach house. A meet-up social space has long been a request of the Cricket fraternity and extends to other sports. This is a small flexible community room for the neighbourhood conveniently by the new cafe.

This should be viewed as an important community gain.

**Landscape**

In talking to families the importance of free roaming in open landscape is highly valued and the proposals do not inhibit this. This characteristic is in large part preserved, but the addition of trees at the perimeter as wooded walks reflects the need to adapt as public pressure grows with the loss of other open green areas elsewhere. Wooded walks improve ambience and reduce crowd effect.

The application's omission of planning for marquees is in part a result of dropping the event scale. The planning of an orchard where a marquee was intended is taken as commitment on this aspect.

The addition of groves or avenues of trees alongside the south lawn reinforces existing structural tree belts. Examining this aspect one should note that the existing trees (groups 4 and 6) are closely spaced at around 5m and have their own screening effect in an east-west view. The proposal suggests a far wider spacing of additional large species at around 15m intervals although, exact position remains to be specified in detail submission later. Whether saplings, semi mature or mature is not specified.

The main "screen" effect of a line of trees is in the foreshortening when looking down the line. Transverse views are often clear. This can be appreciated at Kew and Bushy Park.

**Marble Hill House**

The proposals for the house restoration have always been supported by local people. No questioning of the intent was ever reported on this. The house's value as a local building of interest is also helped by use in filming such as in Vanity Fair. The HLF grants are focused on the need to repair the house and so historic context has to be appreciated over the whole renewal programme.

**Ecology**

The proposals for the wooded quarters beside the House at the south, originally advocating heavy intervention, are now, in response to local request, left wild as protective habitat. The two quarters to the north are now given a lighter management touch leaving the perimeter and reinforcing it.A single path rather than multiple path ways in each of the north quarters reduces foot fall on undergrowth. se These quarters also have a habitat role for certain species. Varied habitat opportunity is a valid approach, as different species thrive in different environments: berries, fruit, nuts, tall or short undergrowth, large or small tree canopies etc. encouraging bats, in one, birds in another, burrowing mammals in another. as well as slow worms, toads etc moving to the water and wetland. There is a good case for variety.

Taller grass is proposed under the reinforced tree groups 4 and 6, between House and river to act as a foraging area for bats and as a species corridor from the two wildest wood quarters to the river. This now addresses the ecology and habitat aspect which was a major request of park users, as is the perimeter increased woodland and natural habitat.

The proposed fencing replaces the deteriorating wood paling with a metal rail design which is less visually intrusive and longer lasting. Given the existing lines of fence around woods and the proposed path access in part, public free movement does not appear to be impeded by the proposals.

The question of new large structures in the landscape has been examined. The proposed semi circular arbours on the south lawn do not have masonry supports as previously shown but are free growing planting, trained into arches. There is a single low to medium structure: a seat canopy.

The historical precedent for the landscape proposed on the South area of the house has been a subject of debate. The proposal as an "impression" of ornamental landscape of the 18th century is a valid approach, and can be found at many historic buildings. The different desires of different visitors result in a multiplicity of opinions and needs. The role of the park for all ages, fitness, disabilities and tastes is an important consideration. A richer planted decorative element with characteristics of colour, perfume and texture in a certain area is important, not only for the fit visitor but the disabled, elderly and those with debilitating mental conditions. This is a public health role previously neglected by the park..

**Other uses**

Sport, dog walking and fitness have all had lobbies to express opinion. There is enhanced match use of pitches and related upgrade of changing facilities. Free roaming for dog walkers is not inhibited. The One O clock Club and Nursery School have a significant role in the life of the park and parents and Trustees have expressed a welcome for the upgrade in landscape together with the improved educational opportunity provided by nature and habitat. Too few nurseriess have such surroundings.

**Heritage Lottery Funding**

English Heritage informs us that HLF continues to support the scheme as amended in this application. This is an important consideration in evaluating the changes made, combining improved community benefit with funding.

**Compliance with Policy**

There has been confusion in many people's minds over what is actually controlled by and expected of Planning Policy. Some aspects appear not to be part of Policy remit; so we list below for general benefit what we believe are the important attributes of the new scheme that meet the National Planning Policy Framework (NPPF) requirements.

* Importance of pre application engagement ( Section 4 para 39)
* Promotion of Social Interaction (Section 8 para 91 a)
* Promotion of healthy lifestyles (Section 8 para 91 c)
* Need for up to date assessment of need for open space for sport and recreation (Section 8 para 96)
* Encouraging multiple benefits from urban land (Section 11 para 118)
* Protecting and enhancing valued landscapes (Section 15 para 170)
* Protecting and enhancing Biodiversity (Section 15 para 170)
* Conserving and enhancing the historic environment (Section paras 184 and 189)

There is always a need to distinguish between opinions on taste with what is actually a Town Planning Policy Material Consideration. The scheme achieves what is required. and now scores well on community benefit.

**Conclusion**

Any planning application for areas of public use with a multiplicity of aspects, treads a difficult path in trying to please everyone. Where there are conflicts in desires, however, the planning authority can look at the pros and cons and can conclude that the package as a whole is a significant public gain and all possible means of dialogue have been explored and changes made.

yours faithfully

Maybourne Projects Architects and Project Managers

A Borough-based practice.

cc General Circulation via M Adams ( Save Marble Hill campaign, dog walkers etc).

English Heritage