



Ms Kreena Patel
London Borough of Richmond Upon Thames
Civic Centre
44 York Street
Twickenham
TW1 3BZ

Direct Dial: 0207 973 3473

Our ref: P01431126
Your ref: 21/0847/FUL

06 July 2021

By email to:

planning@richmond.gov.uk

Dear Ms Patel

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**THE ONE O CLOCK CLUB, MARBLE HILL PARK, RICHMOND ROAD,
TWICKENHAM, TW1 2NL
Application No. 21/0847/FUL**

Thank you for your letter of 16 June 2021 regarding the above application for planning permission. Based on the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

Marble Hill is a complex, multi-layered designed landscape comprising the remains of an 18th century garden and park focussed on the grade I listed Marble Hill House and developed and managed as a public park since 1903. It is a grade II* registered park and garden and constituent part of the Twickenham Riverside Conservation Area.

This application is seeking permission for the comprehensive redevelopment of the Marble Hill Play Centre site in the north east of the registered area, involving demolition of the existing buildings and erection of a single new building of a larger size, alteration and enhancement of the adjacent playgrounds and associated hard and soft landscaping.

The application site is remote and visually screened from Marble Hill House, and relatively well-screened in views from many parts of the park, save the East Meadow where glimpsed views are visually intrusive. The proposed development represents an intensification of use and net increase in the volume of built development within the registered area and the wider setting of Marble Hill House, but this should not materially affect the significance of these designated heritage assets, nor should it





materially affect the character of the Conservation Area.

The proposed development as submitted mirrors what Historic England reviewed as part of a pre-application consultation, when we raised no serious concerns. Therefore, we have no objection to this planning application on heritage grounds and consider that it meets the requirements of the NPPF, paragraph numbers 190, 193, 196 and 200. That said, there are opportunities to enhance the proposals to further reduce visual impact and improve potential for interpretation, which could be subject to condition.

Historic England Advice

The significance of Marble Hill Park

Marble Hill is a complex, multi-layered designed landscape, managed since 1903 as a public park. It contains the remains of an 18th century garden and park created for Henrietta Howard, Countess of Suffolk, between 1724 and 1771 and associated with some of the period's leading proponents of garden design and key figures in the history of designed landscapes, including Alexander Pope, Charles Bridgeman, and Archibald Campbell, Earl of Ilay (and later 3rd Duke of Argyll). The garden and park are focussed on Howard's Marble Hill House (grade I), and contain numerous surviving structures and features, including the brick stable building, icehouse and entrance lodge (all grade II). The site is included in Historic England's *Register of Parks and Gardens of Special Historic Interest in England* at grade II* (NHLE list entry 1000400), which places it within the top 30% of all Registered Parks and Gardens and reflects a level of exceptional historic interest.

The registered park and garden also forms a large part of the Twickenham Riverside Conservation Area.

The impact of the proposed development on designated heritage assets

The Marble Hill Play Centres are located at the north east edge of the registered area, in the far north of East Meadow and occupying the site of the former 18th and 19th century walled kitchen gardens and orchards in Long Sandborough Shot field. It is bounded by the park's existing car park to the west, an existing tarmac path to the south, the existing park depot / sports changing room building to the east and housing (outside of the registered area) to the north. The Play Centres comprises two detached buildings of a modern, 20th century (1970s) construction, set within a fenced enclosure and surrounded by playground structures catering to both toddlers and older children (in the form of an adventure playground).

The existing Play Centres buildings are remote and visually-screened from Marble Hill House and relatively well-screened in views from the core of the park, partly screened by trees within the East Meadow and visible within the context of cars using the car park, goals on the sports pitches, park maintenance facility, and housing (outside of

the registered area). The Marble Hill House and Park Landscape Conservation Management Plan (2015) identifies that “*views to the parked cars and colourful equipment and murals within the playgrounds are highly visible in [the East Meadow] and diminish the rural ambiance of the park*” (p40), which “*...creates a visual intrusion on the wider parkland especially in the East Meadow*” (p41).

The proposed development will comprise demolition of the existing buildings and the erection of a single, new L-shaped building on top of the existing foundations, but with an increased footprint created by infilling the area between the two existing buildings. The new building will have a staggered, curving roofline, which will be higher on average than the existing buildings and covered in a sedum matting system. External spaces will be remodelled, including replacing some of the existing play elements with upgraded equipment, removing 3 no. trees alongside new tree planting, establishing a new hedgerow along existing fencing, and providing a new access point. The existing car park lies outside of the application site and will remain unaltered, save for minor alterations to two bays to better enable accessible parking.

The proposed development represents continuity of current uses in the north east of the registered site, albeit intensified by the provision of new and upgraded facilities. The proposed new building replaces existing structures that make a limited-to-detrimental contribution to the significance of the registered park and garden, and it is intended to better integrate with the landscape through use of an undulating roofline incorporating areas of green roof as well as timber cladding. It will still result in a net increase in the volume of built development within the registered area. The associated physical and visual impacts of this larger structure will cause a small degree of harm to the registered park and garden and the setting of the grade listed House, which should lessen over time as the new planting matures. Regardless, this should not materially affect the significance of these designated heritage assets, nor should it materially affect the character of the Conservation Area.

Policy considerations for these proposals

Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that in considering whether to grant planning permission the local authority shall have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they may possess.

The National Planning Policy Framework (NPPF) sets out the government’s policies for making planning decisions. It states that the purpose of the planning system is to achieve sustainable development and that protection and enhancement of the historic environment is an overarching objective in this (paragraphs 7 and 8).

The NPPF explains how applicants should describe the significance of heritage assets affected and that the level of detail should be sufficient to understand the potential impact of the proposal on their significance (paragraph 189). It notes the desirability of sustaining and enhancing the significance of heritage assets and putting them to



viable uses consistent with their conservation (paragraph 192). It requires great weight to be given to an asset's conservation, irrespective of the level of harm (paragraph 193).

Conflict between an asset's conservation and any aspect of a proposal should be avoided or minimised, including by more sensitive design (paragraph 190 and NPPG). Local planning authorities should look for opportunities for new development in the setting of heritage assets to enhance or better reveal their significance (paragraph 200). It states that any harm or loss to designated heritage assets requires clear and convincing justification (paragraph 194). Harm must then be weighed against the public benefits of the proposal (paragraphs 196).

Historic England's position on the proposals

Historic England engaged in a pre-application consultation with the English Heritage Trust on behalf of their tenant (the applicant) in October-November 2019, issuing an advice letter in December 2019. At the time, we did not highlight any specific link between these proposals and the Marble Hill Revealed project underway within other parts of the registered area - contrary to the applicant's statement in paragraph 7.3.2 of their Planning Statement. We did, however, raise no serious concerns to the proposed redevelopment of the Play Centres given the limited impacts to the significance of the designated heritage assets affected. The proposed development as submitted within this planning application mirrors what we saw during our pre-application consultation. Therefore, we have no objection to this planning application on heritage grounds.

There are, however, opportunities to enhance the proposals to further reduce visual impact and create potential for interpretation, particularly in the detailed design of the external hard and soft landscape elements. Indeed, the hard and soft landscape proposals as submitted make little reference to the Play Centres' location on top of the former walled kitchen garden, which could provide a strong and evocative theme for learning and play. It is unclear what is meant by the '*tree planting influenced by the historic kitchen garden*' under item 14.3 on the Landscape Proposals drawing and would benefit from serious consideration of planting locations and species selection at the detailed design stage. The proposed boundary hedgerows could approximate the former walled kitchen garden enclosure, especially if grown to and maintained at a height reflecting the former walls. Additionally, while there is a desire to re-use as much of the existing play equipment as possible, the pieces of play equipment, their positions, and the paths internal to the playgrounds could better reference the use and layout of the former kitchen gardens as recorded in historic mapping, further aiding interpretation. Such elements could be subject to planning conditions.

Recommendation

Historic England has no objection to this planning application on heritage grounds. We consider that the proposed development meets the requirements of the NPPF,

paragraph numbers 190, 193, 196 and 200.

Your authority should take these representations into account in determining the application. If there are any material changes to the proposals, or you would like further advice, please contact us. Please advise us of the decision in due course.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria, we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

Christopher Laine CMLI
Landscape Architect
Email: Christopher.Laine@historicengland.org.uk

**THE ONE O CLOCK CLUB, MARBLE HILL PARK, RICHMOND ROAD,
TWICKENHAM, TW1 2NL
Application No. 21/0847/FUL**

Information Provided

- Planning Statement (Martin Habell and MHCP, February 2021)
- Design and Access Statement (Martin Habell and MHCP, February 2021)
- Heritage Statement (Le Lay Architects, December 2020)
- Landscape and Visual Impact Appraisal: Redevelopment of Marble Hill Play Centres, Marble Hill Park, Twickenham (terra firma landscape architects, May 2021)
- Marble Hill Playcentres: Landscape Statement (terra firma landscape architects, November 2019)
- Marble Hill Landscape Proposals (2070-TF-00-00-DR-L-1001) (terra firma landscape architects, May 2021)
- Associated building plans, elevations and visuals