



# Heritage Statement

---

25 Ham Farm Road,  
Richmond,  
TW10 5NA

March 2022 | Project Ref 07344B

HCUK Group is a multi-disciplinary environmental practice offering expert advice in archaeology, heritage, landscape, arboriculture, and planning. It began life in 2010 as Heritage Collective LLP, before becoming Heritage Collective UK Limited in 2014. In the coming years diversification saw the addition of Archaeology Collective, Landscape Collective and Planning Collective, before all strands came together to be branded under a single umbrella: HCUK Group, based on the acronym for the original company. A home working company since the beginning, we are pleased to employ a talented workforce of consultants and support staff, who are on hand to advise our clients.



Project Number: 07344B  
 File Origin: C:\Users\Chris Griffiths\HCUK Group\Projects - Documents\Projects 7001-7500\7301-7400\07344 - 25 Ham Farm Rd, TW10\HER\Reports\2022.03.09 - 25 Ham Farm Road\_Richmond\_Heritage Statement\_v.2

Author with date	Reviewer code, with date
CG, 02.03.2022	JE-319, 08.03.2022

# Contents

<b>1. Introduction .....</b>	<b>1</b>
<b>2. Relevant Planning Policy Framework.....</b>	<b>6</b>
<b>3. Background and Significance.....</b>	<b>16</b>
<b>4. Statement of Significance.....</b>	<b>23</b>
<b>5. Heritage Impact Assessment.....</b>	<b>34</b>
<b>6. Conclusion .....</b>	<b>44</b>

# Appendices

- App. 1 Scale of Harm table (HCUK, 2019)**
- App. 2 Original plan drawings**
- App. 3 Proposed Scheme Details**

# Figures

- Fig. 1 Site Plan**
- Fig. 2 No. 25 Ham Farm Road from the north**
- Fig. 3 Conservation Area Map**
- Fig. 4 Heritage Asset Map (Historic England)**
- Fig. 5 1934-35 OS Map**
- Fig. 6 1959 OS Map**
- Fig. 7 Detail of material finishes (rear elevations)**
- Fig. 8 'Crazy paving' to linear terrace**
- Fig. 9 Staircase to Dryden Court (Parkleys Parade)**
- Fig. 10 No. 35, Ham Farm Road**

**Fig. 11 No. 7, Ham Farm Road**

**Fig. 12 Rear elevation of No. 25, Ham Farm Road**

# 1. Introduction

**1.1** This Heritage Statement has been prepared by HCUK Group on behalf of the applicant in respect to proposals for a replacement dwelling at No. 25 Ham Farm Road (**Figures 1 & 2**), hereafter referred to as the 'Site'. The Site is situated within the Parkleys Conservation Area (designated 2<sup>nd</sup> December 2003) and is currently being considered by the local authority for possible inclusion on the list of buildings of townscape merit / local interest following an unsuccessful application to add the building to the National Heritage List for England.<sup>1</sup> The determining authority for the application is the London Borough of Richmond upon Thames (LBRUT).

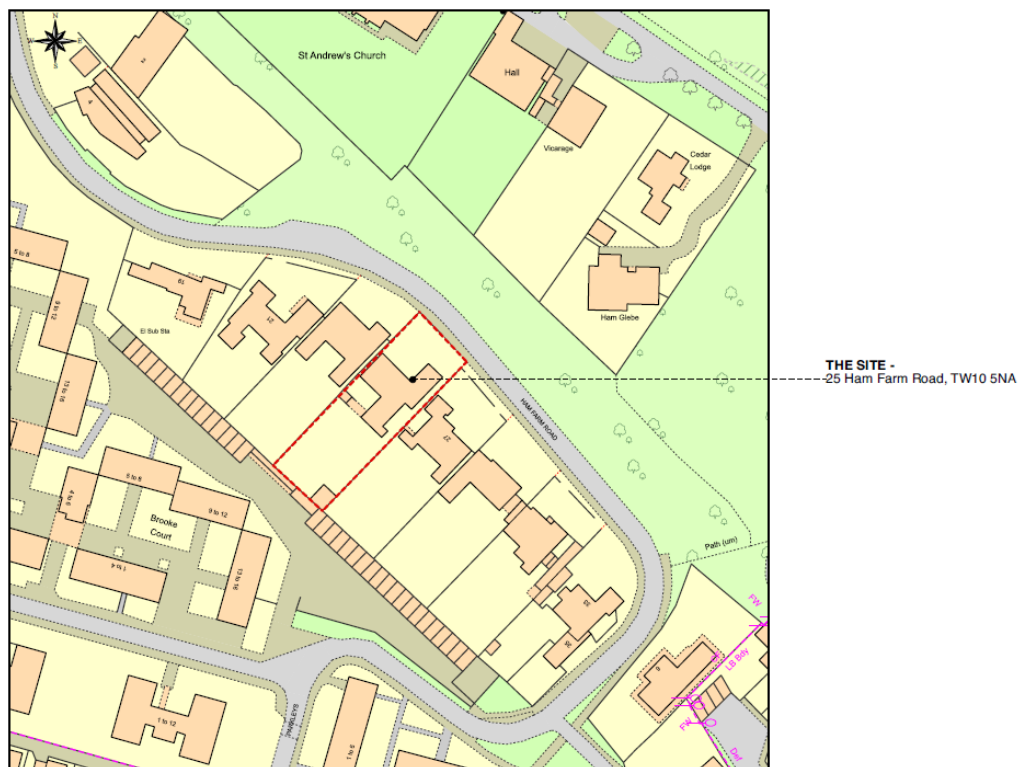


Figure 1: Site plan

<sup>1</sup> See Historic England letter of 16<sup>th</sup> December 2021, ref: 1476038.



Figure 2: No. 25 viewed from Ham Farm Road

## Context

**1.2** It is proposed to demolish the existing single storey house, and replace it with a new bungalow of similar footprint, designed in a modern style that is sympathetic to the special character and appearance of the surrounding conservation area.

**1.3** The proposals have been subject to pre-application consultation with LBRUT<sup>2</sup> with a pre-application letter received on 28<sup>th</sup> January 2022. This letter establishes some initial points of principle and these are acknowledged and addressed within this report. First among them is the Council's position on the loss of the existing building with reference to Policy LP38. The letter notes;

*"LP38 states that the proposal should not have an adverse impact on local character. There is an objection to the harmful impacts to the character and appearance of the CA as a result of the loss of a building of considerable merit."*

**1.4** The proper application of the duty to preserve or enhance the special character and appearance of the conservation area under Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (hereafter the Act – see Section 2) is treated in detail in this report. Policy LP38 should be applied within the framework

---

<sup>2</sup> Ref: 21/P0281/PREAPP

of the statutory duty of Section 72(1) of the Act. The conclusions are set out in Sections 5 and 6.

- 1.5** The pre-application letter also confirms that, *“following discussions on potential Listing status of the property with Historic England,”* which were unsuccessful, *“the building is currently being considered to be locally listed as a Building of Townscape Merit by the Council.”*
- 1.6** Accordingly, while the building is presently not identified as a Building of Townscape Merit, it is treated as a non-designated heritage asset (NDHA) for the purposes of this assessment. The report therefore accommodates the relevant material considerations in heritage terms in the event that the council’s deliberation on this matter reaches a positive conclusion during the lifetime of the application.
- 1.7** In terms of the proposed design of the replacement dwelling, the Council’s position is not adverse. The pre-application letter notes, *“Overall, subject to satisfactory design justification, the design approach could potentially be considered acceptable.”* This endorsement is strongly caveated, however in the following terms; *“Officers uphold an in-principle objection to the demolition of the subject building and you are strongly advised not to pursue this proposal.”*

## Heritage Assets

- 1.8** The only designated heritage asset that would be affected by the proposed development is the Parkleys Conservation Area in which the Site is located (**Figure 3**). The listed buildings of the Span housing development to the south and west (Brooke Court and Spenser Court being the closest) would not be affected due to the effects of distance, tree cover and the single storey height of the existing house and its proposed replacement. The proposed development is of insufficient prominence to have the potential to affect the setting of these grade II listed buildings (**Figure 4**). Section 66(1) of the Act is therefore not engaged.
- 1.9** The Site does not form part of the setting of the buildings of townscape merit at Nos. 7, 9 and 11 Ham Farm Road identified by LBRUT in 2007, and hence these non-designated heritage assets would not be affected by the application scheme.

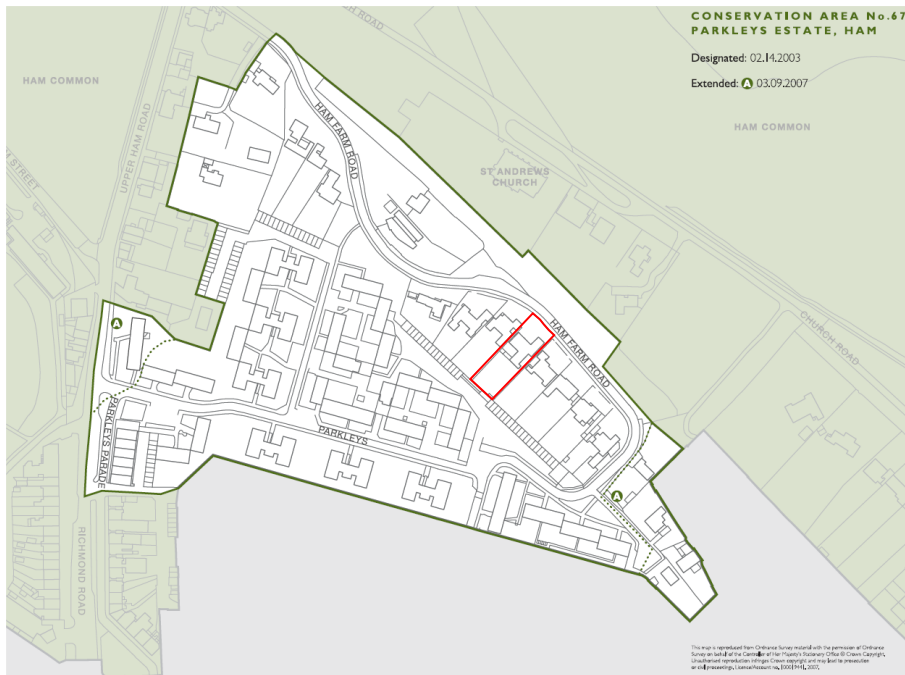


Figure 3: Parkleys Conservation Area Map. The Site is outlined in red. Source: LBRUT



Figure 4: Heritage Asset Mapping (Historic England), with statutorily listed building denoted by blue triangles.

**1.10** Accordingly, this Heritage Statement includes an assessment of the significance of Parkleys Conservation Area, the Site’s contribution to this significance and the likely impact of the Proposed Development on this.



**1.11** The heritage interest of the subject property as a NDHA and the effect of the proposal on its innate significance is also treated in this report as noted above.

## Purpose of the assessment

**1.12** The purpose of this document is to assist the decision maker on the matter of the effects of the proposed development upon the historic built environment and to gauge its suitability in heritage terms. Value judgements on the significance of the heritage assets affected are presented and the effects of the proposals upon that significance are appraised in compliance with paragraph 194 of the National Planning Policy Framework (2021). It also assesses the capability of these assets to absorb change and whether the proposal complies with the guidance and policy of the NPPF and local planning policy and guidance.

**1.13** The report does not address the planning balance in relation to the weighing of public benefits of the proposal against potential harm, if any, to heritage significance.

**1.14** This report does not provide an archaeological assessment of below ground potential. The Historic Environment Record has been consulted via the Heritage Gateway website and other online datasets and resources have provided background information on the site and surrounding assets, they are referenced within the following text where relevant.

## Key Considerations

**1.15** The key heritage considerations are whether the proposals would preserve, enhance or harm the significance of affected heritage assets. The preparation of this report was supported by desk-based research in addition to a Site visit and walkover of the surroundings undertaken in good conditions in September 2021.

**1.16** This Heritage Statement should be read in conjunction with the full drawn submission and the Design and Access Statement prepared by Proctor & Shaw Architects.

## 2. Relevant Planning Policy Framework

### Legislation

- 2.1** Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 requires the decision maker to pay special attention to the desirability of preserving or enhancing the special character and appearance of a conservation area when exercising planning functions. The decision maker must give considerable importance and weight to the desirability of preserving the significance of the conservation area, and there is a strong presumption against the grant of permission for development that would harm its heritage significance.<sup>3</sup>
- 2.2** The meaning and effect of these duties have been considered by the courts in cases since the legislation came into effect, including the Court of Appeal decision in relation to *South Oxfordshire DC v SSE & J Donaldson (March 1991, CO/1440/89)*. The Court found that section 72 requires attention to be directed to the effect on the conservation area as a whole rather than on particular parts of it.
- 2.3** For the purposes of this statement, preservation equates to an absence of harm.<sup>4</sup> Harm is defined in paragraph 84 of Historic England's Conservation Principles as change which erodes the significance of a heritage asset.<sup>5</sup>
- 2.4** Recent case law (*Dorothy Bohm & Ors v Secretary of State for Communities and Local Government & Ors [2017] EWHC 3217 (Admin)*) clarifies the position with regards to the correct application of legislation when dealing with positive contributors in conservation areas. The case law states:

*"... when considering the impact of the proposal on the CA under s.72 [of the Planning (Listed Buildings and Conservation Areas) Act 1990] it is the impact of the entire proposal which is in issue. In other words, the decision maker must*

---

<sup>3</sup> *Barnwell Manor Wind Energy Limited v East Northamptonshire District Council and others [2014] EWCA Civ 137*. This position was confirmed in *R (on the application of) Forge Field Society v. Sevenoaks DC [2014] EWHC 1895 (Admin)*. Nonetheless, Forge Field also makes clear that 'less than substantial' harm does not need to be given the same weight as 'substantial' harm, and also that harm to a listed building (or conservation area) is not irrefutable; it can be outweighed by benefits powerful enough to do so.

<sup>4</sup> *South Lakeland v SSE [1992] 2 AC 141*.

<sup>5</sup> Conservation Principles, 2008, paragraph 84. Heritage Asset is defined by the NPPF (Annex 2) as a: 'building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest'. This includes both designated and non-designated heritage assets.

*not consider merely the removal of the building which made a positive contribution, but also the impact on the CA of the building which replaced it.”*

## **2.5** Furthermore,

*“In respect of s.72, ...[the inspector] ...said that the existing building made a limited positive contribution to the CA, and the net effect of the new building would at worst be neutral and that the CA would not be harmed. Again in my view this was an entirely correct approach. Section 72 requires the overall effect on the CA of the proposal to be considered. There is no requirement for a two stage process by which the demolition part of an application has to be considered separately from the proposed new development.”*

## National Policy

**2.6** The significance of a heritage asset is defined in the National Planning Policy Framework (NPPF – July 2021) as being made up of four main constituents: architectural, historical, archaeological and artistic interest. The assessments of heritage significance and impact are normally made with primary reference to the four main elements of significance identified in the NPPF.

**2.7** Paragraph 197 of the NPPF underlines the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation,<sup>6</sup> and reiterates the well-established concept that new development can make a positive contribution to local character and distinctiveness.

**2.8** Paragraph 195 indicates that harm should be avoided or minimised and that which remains requires clear and convincing justification (Paragraph 200).

**2.9** The setting of a heritage asset can contribute to its significance. Setting is defined in the NPPF as follows:

*“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a*

---

<sup>6</sup> *Conservation* (for heritage policy) is defined in Annex 2 of the NPPF as: “The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.”

*setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.”*

**2.10** The NPPF requires the impact on the significance of designated heritage assets<sup>7</sup> to be considered in terms of either “substantial harm” or “less than substantial harm” as described within paragraphs 201 and 202 of that document. National Planning Practice Guidance (NPPG) makes it clear that substantial harm is a high test, and case law describes substantial harm in terms of an effect that would vitiate or drain away much of the significance of a heritage asset.<sup>8</sup> The Scale of Harm is tabulated at **Appendix 1**.

**2.11** Paragraphs 201 and 202 of the NPPF refer to two different balancing exercises in which harm to significance, if any, is to be balanced with public benefit. Paragraph 18a-020-20190723 of National Planning Practice Guidance (NPPG) online makes it clear that some heritage-specific benefits can be public benefits. Paragraph 18a-018-20190723 of the same NPPG makes it clear that it is important to be explicit about the category of harm (that is, whether paragraph 201 or 202 of the NPPF applies, if at all), and the extent of harm, when dealing with decisions affecting designated heritage assets, as follows:

*“Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.”*

**2.12** Paragraphs 199 and 200 of the NPPF state that great weight should be given to the conservation of a designated heritage asset when considering applications that affect its significance, irrespective of how substantial or otherwise that harm might be.

**2.13** Paragraph 203 of the NPPF refers to the approach to be taken towards non-designated heritage assets as follows:

*“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a*

---

<sup>7</sup> The seven categories of designated heritage assets are World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Park and Gardens, Registered Battlefield and Conservation Areas, designated under the relevant legislation.

<sup>8</sup> Bedford Borough Council v SSCLG and Nuon UK Limited [2013] EWHC 4344 (Admin).

*balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."*

**2.14** Paragraph 203 of the NPPF is potentially relevant to this application since it involves the demolition a building being considered by LBRUT for local listing.

**2.15** The policy tests set out for non-designated heritage assets are clearly more limited than those relating to designated heritage assets (including paragraphs 199 to 202 of the NPPF). All that is required by paragraph 203 in respect of non-designated heritage assets is that the effect of an application on the significance of that asset should be taken into account (Paragraphs 44-46 of *Travis Perkins (Properties) Ltd V Westminster City Council & Ors [2017] EWHC 2738 (Admin)*). In full, this policy notes that:

*"The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."*

**2.16** The same case law referred to in paragraph 2.4 above (*Dorothy Bohm & Ors v Secretary of State for Communities and Local Government & Ors [2017] EWHC 3217 (Admin)*) clarifies the position with regards to the correct application of planning policy 203. N.B. this case refers to the NPPF 2012 paragraph numbering but remains valid as paragraphs 135 and 203 are verbatim:

*"34. Secondly, the Inspector also had to apply the policy test in para 135 of the NPPF. Unsurprisingly, given that an NDHA does not itself have statutory protection, the test in para 135 is different from that in paras 132-4, which concern designated heritage assets. Paragraph 135 calls for weighing "applications" that affect an NDHA, in other words the consideration under that paragraph must be of the application as a whole, not merely the demolition but also the construction of the new building. It then requires a balanced judgement to be made by the decision maker. The NPPF does not seek to prescribe how that balance should be undertaken, or what weight should be given to any particular matter.*

*35. This is the analysis that the Inspector undertook in the decision letter. She considered the significance of the NDHA in its own right in paras 3-11. Her conclusion in para 10 was that the building had some limited local heritage interest, but that did not weigh significantly in favour of retention. At para 11 she weighed up the loss of the building with the construction of the new building, which she said would be acceptable and would promote and reinforce local distinctiveness. She concluded that there would not be an adverse impact from the loss. This was precisely the "balanced judgement" that she was required to do under para 135."*

**2.17** Therefore, with regards to non-designated heritage assets, this application must be weighed as a whole, i.e. not merely the demolition of No. 25 Ham Farm Road but also the construction of the replacement building. In other words, harm to a NDHA (if any) should not be regarded in the same way as a designated asset. The planning benefits of the proposed scheme, outlined in the planning statement, are also of importance.

**2.18** Paragraph 206 of the NPPF states that local planning authorities should look for opportunities for new development within Conservation areas, and within the setting of heritage assets to enhance or better reveal their significance and further, that proposals that preserve "*those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably*".

**2.19** Paragraph 207 of the NPPF states that not all elements of a Conservation Area (or World Heritage Site) will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 201 or less than substantial harm under paragraph 202, as appropriate, taking into account the relative significance of the Conservation Area or World Heritage Site as a whole.<sup>9</sup>

---

<sup>9</sup> C.f. South Oxfordshire DC v SSE & J Donaldson (March 1991, CO/1440/89).

# Local Planning Policy

## LBRUT Local Plan

**2.20** The LBRUT Local Plan was adopted in July 2018. Relevant policies to this application are included below.

**2.21** **LP1 Local Character and Design Quality:** The Council will require all development to be of high architectural and urban design quality. The high-quality character and heritage of the borough and its villages will need to be maintained and enhanced where opportunities arise. Development proposals will have to demonstrate a thorough understanding of the site and how it relates to its existing context, including character and appearance, and take opportunities to improve the quality and character of buildings, spaces and the local area.

**LP3 Designated Heritage Assets:** The Council will require development to conserve and, where possible, take opportunities to make a positive contribution to, the historic environment of the borough. Development proposals likely to adversely affect the significance of heritage assets will be assessed against the requirement to seek to avoid harm and the justification for the proposal. The significance (including the settings) of the borough's designated heritage assets, encompassing Conservation Areas, listed buildings, Scheduled Monuments as well as the Registered Historic Parks and Gardens, will be conserved and enhanced, will be conserved and enhanced by the following means:

- 1. Give great weight to the conservation of the heritage asset when considering the impact of a proposed development on the significance of the asset.*
- 2. Resist the demolition in whole, or in part, of listed building. Consent for demolition of Grade II listed buildings will only be granted in exceptional circumstances and for Grade II\* and Grade I listed buildings in wholly exceptional circumstances following a thorough assessment of the justification for the proposal and the significance of the asset.*
- 3. Resist the change of use of listed buildings where their significance would be harmed, particularly where the current use contributes to the character of the surrounding area and to its sense of place.*
- 4. Require the retention and preservation of the original structure, layout,*

*architectural features, materials as well as later features of interest within listed buildings, and resist the removal or modification of features that are both internally and externally of architectural importance or that contribute to the significance of the asset.*

*5. Demolitions (in whole or in part), alterations, extensions and any other modifications to listed buildings should be based on an accurate understanding of the significance of the heritage asset.*

*6. Require, where appropriate, the reinstatement of internal and external features of special architectural or historic significance within listed buildings, and the removal of internal and external features that harm the significance of the asset, commensurate with the extent of proposed development.*

*7. Require the use of appropriate materials and techniques and strongly encourage any works or repairs to a designated heritage asset to be carried out in a correct, scholarly manner by appropriate specialists.*

*8. Protect and enhance the borough's registered Historic Parks and Gardens by ensuring that proposals do not have an adverse effect on their significance, including their setting and/or views to and from the registered landscape.*

*9. Protect Scheduled Monuments by ensuring proposals do not have an adverse impact on their significance.*

*B. Resist substantial demolition in Conservation Areas and any changes that could harm heritage assets, unless it can be demonstrated that: 1. in the case of substantial harm or loss to the significance of the heritage asset, it is necessary to achieve substantial public benefits that outweigh that harm or loss; 2. in the case of less than substantial harm to the significance of the heritage asset, that the public benefits, including securing the optimum viable use, outweigh that harm; or 3. the building or part of the building or structure makes no positive contribution to the character or distinctiveness of the area.*

*C. All proposals in Conservation Areas are required to preserve and, where possible, enhance the character or the appearance of the Conservation Area."*

## **2.22** Local Plan Policy LP 38 is also relevant:

Policy LP38 states that, "existing housing should be retained. Redevelopment of existing housing should normally only take place where;



- a. *first been demonstrated that the existing housing is incapable of improvement or conversion to satisfactory standard to provide an equivalent scheme; and, if this is the case*
- b. *the proposal does not have an adverse impact on local character; and*
- c. *the proposal provides a reasonable standard of accommodation, including accessible design, as set out in LP 35 Housing Mix and Standards"*

## London Plan 2021

**2.23** The London Plan 2021 is the spatial development strategy for greater London and is part of the statutory development plan for London.

**2.24** Policy HC1 - Heritage conservation and growth Part C states:

*Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.*

**2.25** Part D of HC1 relates to archaeology as follows:

*Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.*

## Local Guidance

**2.26** The *Character Appraisal & Management Plan Conservation Areas – Petersham no.6, Ham Common no.7, Ham House no.23 & Parkleys Estate no.67*, March 2007, has been taken into account in the preparation of this report. The guidance contained

within this document has also informed the design and planning of the proposed development.

## National Guidance Documents

### National Planning Practice Guidance (NPPG)

**2.27** The National Planning Practice Guidance (NPPG; ref: 18a-018-20190723; updated July 2019) provides advice on enhancing and conserving the historic environment in accordance with the NPPF.

**2.28** NPPG notes that public benefits can be heritage based for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit. The guidance goes on to note that examples of heritage based public benefits include:

- Sustaining or enhancing the significance of a heritage asset and the contribution of its setting;
- Reducing or removing risks to a heritage asset; and
- Securing the optimum viable use of a heritage asset in support of its long-term conservation.

### GPA2: Managing Significance in Decision-Taking in the Historic Environment (March 2015)

**2.29** This document provides advice on numerous ways in which decision making in the historic environment could be undertaken, emphasising that the first step for all applicants is to understand the significance of any affected heritage asset and the contribution of its setting to that significance. In line with the NPPF and PPG, the document states that early engagement and expert advice in considering and assessing the significance of heritage assets is encouraged. The advice suggests a structured, staged approach to the assembly and analysis of relevant information:

- 1) Understand the significance of the affected assets;
- 2) Understand the impact of the proposal on that significance;
- 3) Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;

- 4) Look for opportunities to better reveal or enhance significance;
- 5) Justify any harmful impacts in terms of the sustainable development objective of conserving significance balanced with the need for change; and
- 6) Offset negative impacts to significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

## 3. Background and Significance

### Historic Development Parkleys Estate / Nos. 25 Ham Farm Rd

- 3.1** James Walker sold his family's Ham Farm Nursery, bordering the west side of Ham Common, for development to Bargood Estates on 30th March 1953. Bargood Estates had been established by architect Geoffrey Paulson Townsend in conjunction with Henry Cushman, a mortgage agent for the Alliance Building Society, early in 1953.
- 3.2** Townsend had established an architectural practice, *Modern Homes*, in Richmond in 1937, and from 1938 he worked with fellow architect Eric Lyons in designing small housing estates in modernist style; their first project was a group of maisonettes adjoining the royal Military School of Music in Twickenham.<sup>10</sup> They had met in the early 1930s as students attending evening classes at Regent Street Polytechnic.
- 3.3** After the war, the pair worked together again on bomb-damaged properties and on the development of four blocks of flats on the Oaklands Estate Whitton, Twickenham, which were completed in 1948.
- 3.4** As RIBA membership at that time precluded architects from trading as developers, Townsend resigned his membership in 1953 to avoid a conflict of interests in promoting the development of the land at Ham Common by his fledgling company, Bargood Estates. Although his architectural partnership with Eric Lyons was terminated before the new company was established, Lyons was retained as consultant architect to the development of the Ham Farm land, which comprised a series of 175 flats in fifteen 2-storey and 3-storey blocks, known as courts, together with a parade of 6 shops, known as Parkleys, which were built in the period 1954-6. All fifteen blocks were statutorily listed at grade II on 22<sup>nd</sup> December 1998, and the Parkleys Estate (inclusive of Ham Farm Road) was designated a conservation area in 2003.
- 3.5** Prior to the construction of the Parkleys Estate, Bargood Estates had divided the piece of land abutting the west side of the track which was to become Ham Farm Road. As indicated on **Figures 5** and **6**, the majority of the nursery glasshouses, an

---

<sup>10</sup> Simms 2006.

orchard and area of open farmland occupied this strip of land, with Ham Farmhouse situated just to the south west. This strip was divided into 17 house-building plots which were sold to private individuals in order to fund the development of Parkleys. A major covenant to the sale was that only a single building would be permitted on each plot.

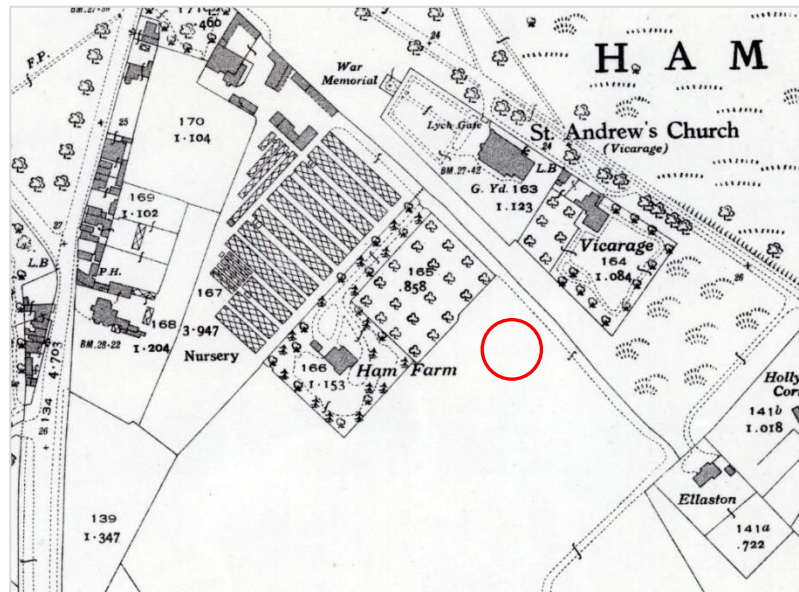


Figure 5: 1934-5. Ordnance Survey 1:2500 scale map. The approximate site of No. 25 is ringed.

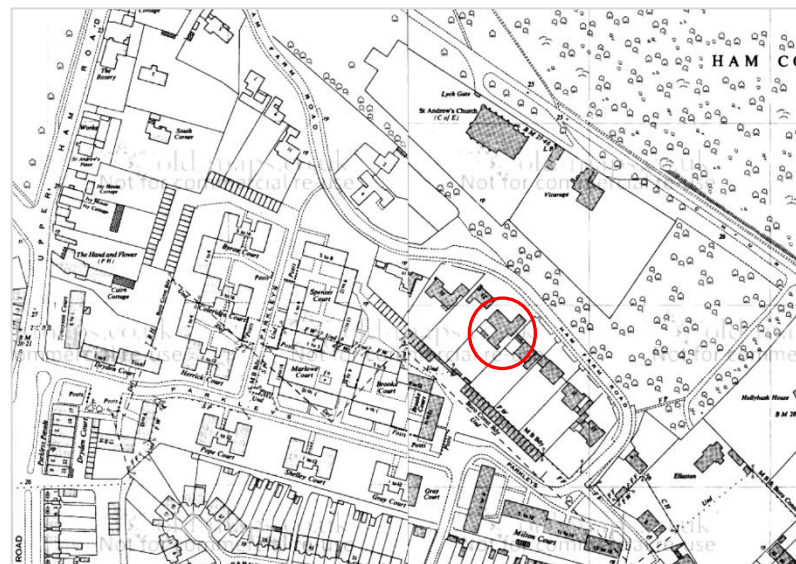


Figure 6: 1959. Ordnance Survey 1:1250 scale map. No. 25 is ringed.

### 3.6

The Land Registry Title for No. 25 Ham Farm Road, records the Conveyance, dated 30th March 1953 (the day on which Bargood Estates completed its purchase of Ham Farm Nursery from James Walker) between 1) James Walker 2) Geoffrey Paulson

Townsend & Henry Abraham Cushman 3) Bargood Estates Ltd and 4) William Ernest Bowles. The conveyance was subject to (unspecified) restrictive covenants.<sup>11</sup> The land was subject to an annual rent charge of £10 payable for 999 years from 31st December 1952.

**3.7** Bargood Estates maintained overall control of the design of the houses built on the individual plots, retaining the right to reject a proposed house design unless approved by the company architect:

*'...unless the plans elevations and specifications thereof shall in the first place have been submitted to and approved by the Architect of the Company or its successors in title... Under the conveyance agreement no building might be built which had not been approved by the company's architect.'*<sup>12</sup>

**3.8** The company's architect, Eric Lyons, charged 10 guineas for this service.

**3.9** Lyons was responsible for the design of at least three of these individual houses: No. 9 for film director Norman Castle Hemsley (1955), No. 11 for physician Dr. Denis J. Cussen (1953)<sup>13</sup> and No. 25. None of these houses is statutorily listed. Confusingly, a recent gazetteer of built projects by Eric Lyons compiled by Ivor Cunningham and Research Design only includes the house built for Dr D. Cussen at 11 Ham Farm Road in 1953 in his canon of work.<sup>14</sup>

**3.10** Apart from Lyons' work at Nos. 9, 11 and 25 the architects of only six of the eighteen mid-20<sup>th</sup> century houses at Ham Farm Road are firmly established: No 4 - Architects' Co-Partnership (demolished 2001); Nos. 7, 21<sup>15</sup> and 33/5 - Leslie Gooday in collaboration with C. Wycliffe Noble; No. 10 - Jock Kenneir and No. 27 - Bernard Kreeger.

**3.11** Certain features at No. 25 indicate a close relationship with Lyons' Parkleys estate, such as the use of red tile hanging to the clerestory level (**Figure 7**) and crazy paving formed out of broken marble (**Figure 8**), which appears on the external staircase accessing the flats above the parade of shops at Dryden Court (Parkleys Parade) - **Figure 9**.

---

<sup>11</sup> Referred to in the Charges Register.

<sup>12</sup> <http://hamiswheretheheartis.com/ham-by-topic/housing/ham-farm-road/>

<sup>13</sup> <http://hamiswheretheheartis.com/ham-by-topic/housing/ham-farm-road/>

<sup>14</sup> Simms 2006: Chapter 10 - Gazetteer: 191.

<sup>15</sup> Park 1958.



*Figure 7: Honeycomb concrete tile hanging at No. 25 Ham Farm Road*



*Figure 8: crazy paving to the covered linear terrace formed from broken marble (No. 25)*



Figure 9: Dryden Court – staircase to flats at the upper level

**3.12** The plan and design for 25 Ham Farm Road (then Plot 9) 'erection of detached bungalow and garage' commissioned by Henry Bowles would have been approved by Bargood Estates, before being submitted to and approved by Richmond Council on 30th August 1954.<sup>16</sup> A copy of the plan is appended at **Appendix 2**. Unfortunately the quality of the print taken from the archived microfilm is too poor to enable all the legend and annotations to be read. The drawing was approved by Lyons since it bears his company stamp<sup>17</sup>, and this stamp in turn is taken as credible evidence of his authorship.

**3.13** The RIBA Catalogue (Eric Lyons Collection of Drawings) contains perspective drawings by Lyons for both Nos. 9 & 11 Ham Farm Road (see paragraph 9 above), for which he is the known architect, but none relating to No. 25.<sup>18</sup> The fact that Lyons did not publicise his design for No. 25, and the reason why his authorship had not previously come to light, could be because the client, Mr Bowles, wanted it

---

<sup>16</sup> London Borough of Richmond planning records: Planning Application No. 7297, 30th August, 1954. As built the house differs from the approved plan in a number of respects, including the configuration of fenestration to the south and east elevations, the shape of the front chimney stack, which is square rather than rectangular in section, and the glazed roof covering above the kitchen area, which is now missing / clad over in zinc.

<sup>17</sup> In the very bottom right hand box in the corner of the drawing the typeface reads 'ERIC LYONS FRIBA MSIA / CHARTERED ARCHITECT- DESIGN CONSULTANT / MILL HOUSE BRIDGE ROAD HAMPTON COURT / SURREY MOLSEY 2815 4044.'

<sup>18</sup> RIBA Catalogue: No. 9 (Plot No. 2) 1953 [RAN 48, Outstore]; No.11. Design for Dr D.J. Cassen, 1953 [RAN 48, Outstore].



to remain a private commission. The other alternative is that Lyons had no wish to claim responsibility for it.

**3.14** The Pevsner Guide singles out only one of the houses for particular comment: *'Close to Parkleys, in Ham Farm Road, a good house by L. Gooday, 1956, with a low roof of uneven pitch.'*<sup>19</sup> Although the address is not given, it is most likely to refer to No. 35 (**Figure 10**), which was designed by Leslie Gooday. Both Nos. 33-35 and No. 7 (**Figure 11**) exhibit strong similarities with No. 25. These include the use of low pitched copper clad and felted flat roofs, brickwork combining Flemish and stretcher bond, covered walkways with the canopy supported on slender cylindrical columns and liberal use of vertical timber boarding.

**3.15** Nos. 7, 9 and 11 Ham Farm Road were added to the local list of buildings of townscape merit in Richmond Borough in 2007. These houses are considered to be *'exceptional Modern buildings of local architectural or historic interest, which make a positive contribution to the townscape.'* It is not unsurprising that No. 25 was overlooked as part of the character appraisal and management plan adopted by the council on 30<sup>th</sup> March, 2007, following public consultation. This omission provides a clear indication of the limited architectural quality of No. 25 and its modest contribution to the character and appearance of the conservation area (see Sections 4 and 5 for further analysis).



Figure 10: No. 35 Ham Farm Road (designed by Leslie Gooday & Wycliffe Noble, 1955). Source: Google Street View

---

<sup>19</sup> Cherry & Pevsner 2002: 474.



*Figure 11: No. 7 Ham Farm Road (designed by Leslie Goodday & Wycliffe Noble, c.1956), refurbished and extra storey added 2018-19.*

**3.16** Bargood Estates became Span Developments in 1957, by which time Geoffrey Townsend had joined forces with another property developer, Leslie Bilsby, and Lyons was joined by architects Ivor Cunningham, Warner Baxter and Gilbert Powell. Span went on to build several innovative housing schemes set in landscape settings at Blackheath, Twickenham and Teddington during the late 1950s and 1960s. Lyons was awarded an OBE in 1959 and became President of RIBA 1975-7.

**3.17** No. 25 Ham Farm Road has changed hands several times since it was built for Henry Bowles, indeed it is not known with certainty that Mr Bowles ever lived at the property.<sup>20</sup>

---

<sup>20</sup> The resident of No. 27 (Mrs Marber, who has lived at the property since it was built in 1956, designed by Bernard Kreeger, a pupil of Eric Lyons and a relative of the Marber family residing at No. 27) recalls that the house was originally occupied by Mr McCarthy from the time of its completion. According to Mrs Marber, Mr McCarthy owned two grocery stores from the 1950s, including one at Parkleys Parade.

## 4. Statement of Significance

**4.1** This part of the report considers the heritage interest of the Site and the Parkleys Estate Conservation Area, including the contribution made by the Site to the significance of the latter.

**4.2** It is recognised that not all parts of a heritage asset will necessarily be of equal significance. In some cases, certain aspects or elements could accommodate change without affecting the government’s objectives, which include ‘intelligently managed change’ and which seeks to ensure decisions are based on the nature, extent and level of significance of those heritage assets affected.

**4.3** Change is only considered to be harmful where it erodes or negatively affects a heritage asset’s significance. Understanding the significance of any heritage asset (along with any contribution made by its setting) is, therefore, fundamental to understanding the ability for the asset to accept change.

### No. 25 Ham Farm Road - Description of the Building<sup>21</sup>

#### *Material Construction and Plan Form*

**4.4** The building is part brick-built (red and yellow, expressed in a combination of Flemish (solid wall) and stretcher bond (cavity)) and part steel-framed. There are small areas of tile-hanging to the rear. Windows appear to be original and are predominantly timber, with steel frames used in selective areas. Doors are timber. The roof is clad in copper and zinc where pitched, and felted where flat. Paving to the linear terrace at the rear is of crazed marble slabs (travertine) laid in a white grout. Black marble is used for the hearth in the main living room.

**4.5** The house has a single storey and is set back from the road behind an attached flat-roofed garage to the left, a cobbled front drive flanked by a paved path and lawn. The main range is rectangular in plan with a long, low principal elevation facing north-east onto Ham Farm Road. The entrance is off-centre, hard against the side wall of the projecting garage. The roof has a mono-pitch, sloping down towards

---

<sup>21</sup> This sub-section (paragraphs 4.2–4.8) is derived largely from Historic England’s consultation report of 15<sup>th</sup> September 2021. This provides an accurate description of the building and summary of its principal features.

the front of the building. This main range is of brick construction and contains the kitchen to the south east end, behind the garage, and an entrance hall and an inner hall to the centre from which bedrooms and the bathroom are reached. The bathroom and one of the three bedrooms are contained within a flat-roofed wing projecting to the rear; this is partly of brick construction, with timber framed and timber clad in-fill.

#### 4.6

At the end of the entrance hall, opposite the front door, a glazed screen opens into a split-level, open-plan living area, contained within a steel-framed, flat-roofed wing running perpendicular to the front range. The space is divided into a dining area (closest to the entrance hall) and sitting area, by a free-standing fireplace with tapering chimney stack rising through the ceiling. At the far end of the room is a raised dais, reached by three steps; this gives access to a small glazed sunroom to the south east and to a covered linear terrace to the north west.

#### 4.7

The sunroom and terrace enclose paved garden courtyards on either side of the linear living area. The garden is behind the house to the south-west.



*Figure 12: View of No. 25 Ham Farm Road from the south west (rear garden). No. 27, by Bernard Kreeger (1956) is to the right.*

## *Exterior*

- 4.8** From Ham Farm Road the house appears as a low yellow brick bungalow with a shallow-pitched roof, suggesting a deep rectangular footprint. The roof is predominantly copper, so is Verdigris in colour, but over the kitchen (behind the garage) appears to be zinc – presumably a later reroofing; a slim brick chimney rises through the slope. There are several large horizontally-orientated windows, a combination of fixed lights and pivoted timber casements. The solid flush-panel front door, and adjacent glazed screen, is set back within the footprint of the building, creating a small entrance vestibule enclosed by sliding glazed doors. The flat-roofed garage, which projects forward of the house, is of red brick with a white weather-boarded fascia above a metal roller door.
- 4.9** To the rear, the character of the house is more nuanced with the rear projecting living room and conservatory wing creating multiple elevations. The rear of the main range is brick, with red honey-comb style tile-hanging to either side of a run of clerestory windows beneath the apex of the mono-pitch roof. The flat-roofed, brick-built bedroom/bathroom range has timber windows, one with adjacent garden door and set within a timber weather-boarded screen.
- 4.10** The walls of the steel-framed wing are a mixture of vertical timber boarding and floor-to ceiling glazing held predominantly in timber frames, steel to the conservatory. The covered linear terrace to the north has a flat roof, becoming a pergola at the far end, supported on slender cylindrical steel columns. The terrace is paved in a crazy paving of broken marble with textured concrete edging which continues around the steel-framed wing to form a shallow projecting plinth. The external steps are formed of slabs of black flecked textured concrete. The concealed carriage pieces are made of the same material.

## *Assessment of Significance*

- 4.11** The following assessment of significance is based on professional judgement against the four categories identified within the NPPF / NPPG: architectural interest, historical interest, archaeological interest and artistic interest. The contribution of the building's setting is also assessed.

**4.12** Within these terms, the significance of No. 25 Ham Farm Road can be summarised as follows:

**4.13** **Architectural Interest:** No. 25 Ham Farm Road is an example of post-war Modernism in domestic architecture. The house combines a distinct plan form with contrasting mono-pitch and flat roof single storey elements and diverse material finishes to the exterior. As built, the house corresponds closely to the plans approved by Richmond Borough Council in 1954, though with some discrepancies (as noted above in paragraph 3.12 – see also **Appendix 2**), and is acknowledged as the work of Eric Lyons, the consultant architect of Bargood Estates who owned and developed the land.

**4.14** The use of honey-comb style, rouge coloured concrete tile hanging and broken marble to form crazy paving is suggestive of the grade II listed parade and residential courts of the Parkleys Estate. On stylistic grounds this is indicative of Lyons' approach to materials and 'embellishment'. However, the form of the house and arrangement of roofs and single storey ranges is more experimental, as noted by Historic England in their Advice Report of 6<sup>th</sup> December 2021, wherein it states:

*"Arguably, these aspects show an early and experimental iteration of some of the ideas which Lyons took into the compact, efficient plans he devised for Span. However, overall, as a bespoke, detached house, the planning at 25 Ham Farm Road is limited in its claim to special interest."*

**4.15** As a composition, the building's architectural interest is undermined by the prominence of the adjoining garage to the front of the house. This tends to dominate views from the public realm and diminish any appreciation or expression of architectural value. On this point Historic England comment as follows:

*"A very prominent garage does appear to have been a feature of a number of Lyons' private houses, but with regard to the planning of 25 Ham Farm Road, the placement of the garage in front of this single storey building does result in it being especially dominant in the formal composition."*

**4.16** While the association with Eric Lyons as the designer does confer some architectural interest on the building, the design is not considered to be particularly innovative or influential and thus the building's architectural interest is of no more than *low* significance in a national context and is not of special interest.

**4.17** **Historic Interest:** The house stands on the edge of Span's Grade II-listed Parkleys estate, designed by Lyons and the first scheme to bring the development company to wider acclaim. Although there is not a direct visual relationship between the house and the estate, there is a historic interest in their shared context and authorship. The houses contemporary with No. 25 along Ham Farm Road were developed separately as detached residences to subsidise the main development comprising fifteen blocks of flats, all of which are grade II listed. There is also some historic interest arising from the building as an example of domestic post war Modernism. However it is not an outstanding or rare example, even in the context of Ham Farm Road, and its historical interest does not weigh significantly in favour of its retention.

**4.18** **Artistic Interest:** The building artistic interest is extremely limited and bound up with the craftsmanship of its construction, including the crazed marble flooring to the external terrace, although this is very tenuous in heritage terms. There is no sculptural or decorative detailing within the building.

**4.19** **Archaeological Interest:** The upstanding fabric is of low evidential value. The below ground archaeological potential of the Site falls outside the scope of this report. The Site does not lie within an Archaeological Priority Area.

**4.20** In addition to the values identified above the following criteria are of note in a local context. These are set out in the Buildings of Townscape Merit SPD adopted by LBRUT in May 2015.

**4.21** Buildings of Townscape Merit are designated according to the following criteria:

- *Any building or structure which dates from before 1840.*
- *Later buildings or structures which are considered to be of definite quality and character, including the work of important architects and builders.*
- *Particular attention will be paid to buildings which:*
  - a) *Have important historic associations, in terms of famous people or events;*
  - b) *Illustrates an important aspect of social or economic history or use;*

*c) Represent an exceptionally good example of a specific and distinctive architectural style;*

*d) Demonstrate excellence in building craftsmanship, use of materials, technical innovation, architectural features and detailing;*

*e) Form part of a distinctive and cohesive group of buildings;*

*f) Retain its original architectural interest and integrity, and not subject to insensitive alterations;*

*g) Have landmark quality or make a unique and positive contribution to the quality of the townscape or an open space.*

#### **4.22**

When gauged against this local criteria, the subject building is obviously much later than 1840 but has been demonstrated to be the work of a well known 20<sup>th</sup> century architect – Eric Lyons. However, as noted by Historic England in their formal Advice Report of 6<sup>th</sup> December 2021, the design lacks quality and the character of the building is not innovative or distinctive. The Advice Report states:

*"While the authorship of the building, its relationship to Parkleys and its level of preservation all contribute to its interest, they are not collectively sufficient to merit its listing.*

*There are aspects characteristic of Lyons' work, such as the range of materials: brick, timber, glass and hung tiles, but these are not managed with his typical skill. To the front the house is extremely plain and to the rear, very busy.*

*The scarcity of materials in the early 1950s might have contributed to the unusual extent of this variety; however, it is not the variety itself which is problematic, it is that the compositional use of the materials and the detailing is not convincing."*

#### **4.23**

The conclusion reached by Historic England is that the building's design "lacks refinement and consistency as a whole and as a bespoke, detached house, the planning at 25 Ham Farm Road is limited in its claim to special interest."

#### **4.24**

It is accepted, as Historic England posit, that the building does have claims to interest:



*"not least because it is one of very few surviving privately commissioned houses by the architect and it survives in a little-altered state. As a bespoke design, it explores an approach to planning and construction unusual in Lyons' domestic work."*

**4.25** However,

*"there is an inconsistency in its architectural vision and in the refinement of its execution and these factors undermine the more interesting aspects of the building's design. Furthermore, the understated elegance which characterises Lyons' work is not best represented in this building and the rarity of its survival is not sufficient to override its shortcomings."*

**4.26** In regards to the points of particular attention it is evident that the building has no important historic associations in terms of famous people or events (the authorship of Eric Lyons notwithstanding) – *criteria (a)*. Neither does it illustrate an important aspect of social or economic history or use, at least not to the same degree as the grade II listed flats designed by Span Developments within the Parkleys Estate – *criteria (b)*.

**4.27** As amply demonstrated above, the house does not represent 'an exceptionally good example of a specific and distinctive architectural style' (*criteria (c)*), nor is there a demonstrable 'excellence in building craftsmanship, use of materials, technical innovation, architectural features and detailing.' – *criteria (d)*.

**4.28** In view of the changes made to the houses on Harm Farm Road and number of new or replacement houses, the building no longer forms part of a distinctive and cohesive group of buildings (*criteria (e)*). The presence of contemporary houses by Lyons and his associates, including Leslie Gooday, is too dispersed and intermittent to comprise what could be meaningfully described as a distinctive and cohesive group.

**4.29** Regarding *criteria (f)*, the building does retain its original architectural interest and integrity, and has not been subject to insensitive alterations to any great extent. However, as noted above, the degree of architectural interest is limited and of insufficient quality to weigh significantly in favour of the building's retention.

**4.30** Finally, under *criteria (g)* the building is of insufficient prominence or architectural distinction to achieve any landmark quality. Its contribution to the quality of the townscape is positive, but again limited on account of the building's modest architectural value.

**4.31** In summary, as a non-designated heritage asset No. 25 Ham Farm Road is of less than special interest and its value in a national context is low heritage terms. The building has some local importance considering its wider context and authorship by Eric Lyons as noted above. However, the building's modest architectural quality and lack of refinement, as well as its shortcomings in terms of plan and layout, does not weigh significantly in favour of its retention. The building's contribution to the special character and appearance of the conservation area is considered in more detail within the Heritage Impact Assessment (Section 5).

#### Setting of 25 Ham Farm Road and contribution to significance

**4.32** No. 25, Ham Farm Road retains its original domestic curtilage and relationship with the road frontage and preserves the original hard and soft landscaping to the front drive, flanking courtyard, quadrangular courtyard and rear garden. The Site forms part of a dispersed group of 1950s houses built as an adjunct to the Parkleys Estate designed and overseen by Eric Lyons and Geoffrey Paulson Townsend of Bargood Estates (later Span Developments). Most of the detached houses have been either altered or extended and several demolished and rebuilt entirely, though No. 25 is among the least altered of the group. The building's setting therefore contributes positively to its significance and informs an understanding of the building's origins and the idiosyncrasies of its architectural design.

**4.33** The wider architectural context forms part of the setting and is an example of a privately funded housing development designed for first time buyers.<sup>22</sup> The importance of Parkleys is recognised through the grade II listing in 1998 of the flatted development designed by Eric Lyons and the designation of the conservation area (which includes Ham Farm Road and No. 25) in 2003.

**4.34** As noted above, there are some similarities between the court blocks of Parkleys and No. 25, particularly its use of concrete tile hanging. However, any group value

---

<sup>22</sup> The Parkleys Estate houses offered an innovative endowment mortgage, and is the first example of the successful residents' management companies set up by Span Developments.

is derived more from the association with Span's involvement in the layout of the Parkleys Estate and Lyons' authorship, rather than the particular design and appearance of the building itself or co-visibility with the court blocks. Hence, while there is appreciable group value this does not rise above the level of local interest.

## Parkleys Conservation Area

### Description

**4.35** The Parkleys Estate Conservation Area was designated on 2<sup>nd</sup> December 2003 and lies to the south of Ham Common. The common to the north, Upper Ham Road to the west and suburban Kingston to the south circumscribe it. It adjoins Ham Common conservation area (no.7) to the northwest and Richmond Park conservation area (no.62) to the northeast. The historic development of the Estate is described in Section 3 above.

### Significance

**4.36** LBRUT's Conservation Area Statement describes the Parkleys Estate as a highly influential 1950s planned development of both flats on Parkleys and associated detached houses along Ham Farm Road, by the pioneering Span Developments Ltd.

**4.37** In terms of *historical interest* the estate was the first of the large residential developments by the celebrated Span Developments Ltd. of Eric Lyons and Geoffrey Townsend. This unique private housing development was designed for first time buyers, offering an innovative endowment mortgage, and is the first example of the successful residents' management companies set up by Span.

**4.38** The tree stock and gardener of the former nursery on the site (**Figure 5**) were taken over as part of the development. The buildings of the estate were then carefully laid out to retain existing trees. The high standard of hard and soft landscape and the well-conceived series of spaces and views is an important integral part of the overall design of the estate.

**4.39** *Architectural interest* is found primarily in the innovative private housing at Parkleys. This consists of modern flat blocks of either a three-storey H-plan with central entrance stairwell or two-storey terraces enclosing shared courtyards. These flats are of brick construction with concrete slab floors and flat roofs. They have

large timber windows and distinctive concrete tile-hanging. Span was revolutionary in using such modern architectural design and mixing this with traditional materials. Uniquely the estate also includes a parade of six shops with maisonettes above. The parade at Dryden Court has an even more modern design than the neighbouring flats and includes a fine sculpture by Keith Goodwin. The latter contributes to the *artistic interest* of the conservation area.

**4.40** The housing and shopping parade were listed at grade II in 1998 in recognition of their special historic and architectural interest.

**4.41** Ham Farm Road, where the Site is located, includes a number of large detached houses in garden plots. Noted modern architects individually designed the original thirteen houses in the 1950s, such as Leslie Gooday, Bernard Kreeger and Eric Lyons. Span maintained control over the general layout and approved designs of these houses. Several of the houses contribute to the special character and appearance of the conservation area. The contribution of the Site is considered in more detail below and in Section 5.

#### Contribution of the Site to the significance of Parkleys Conservation Area

**4.42** No. 25 Ham Farm Road makes a modest but positive contribution to the special character and appearance of the heritage asset. The contribution to historical interest is based on the contemporary character of the house and the authorship of Eric Lyons who was responsible for the design and layout of the estate as a whole. As already noted, the building has a degree of architectural interest, but this is limited, along with its material quality and not a particularly successful example of Lyons' domestic architectural output.

**4.43** In summary, the Site's contribution to the significance of the conservation area as a whole is positive, albeit modest. A replacement building at the Site that serves to reinforce the scale, character, architectural interest and pattern of historic development, also has the potential to contribute positively to the conservation area. There is therefore an opportunity for good quality design to preserve significance or at the worst make a neutral contribution, thus avoiding any harm.

**4.44** The proposed development has taken these factors into consideration to ensure that the scale, character and material quality of the replacement dwelling is

commensurate with the sensitivities of the Site. The style and appearance of the proposed replacement building is considered in Section 5 below.

## 5. Heritage Impact Assessment

**5.1** This chapter of the report assesses the impact of the proposed development on the significance of the heritage assets identified in the previous chapter with reference to the tabular methodology set out in **Appendix 1**. This chapter should be read in conjunction with the preceding chapter.

### Summary of Proposed Development

**5.2** It is proposed to demolish the existing building at No. 25, Ham Farm Road and erect a replacement single storey 3 bedroom house with associated car port, cycle and refuse storage, and hard and soft landscaping. The full drawn submission has been prepared by Proctor and Shaw Architects and is illustrated at **Appendix 3**.

**5.3** A full description and rationale for the proposed replacement dwelling is set out in the accompanying Design Statement.

### Assessments of Impact

#### Effects on the Character and Appearance of the Parkleys Estate Conservation Area

**5.4** There are two distinct matters which need to be addressed when discussing the impact of the application proposals on the conservation area: the principle of demolition within the conservation area and the suitability of the replacement building.

#### Principle of Demolition

**5.5** The demolition of No. 25 Ham Farm Road will not result in either total loss or substantial harm to the significance of the conservation area. Considered in isolation and based on its positive but limited contribution to the significance of the PECA the harm resulting from the loss of the building should be assessed in line with paragraph 207 of the NPPF. Notwithstanding the quality of the replacement building, the loss of the building would be likely to result in a low level of medium

level of harm to the special character and appearance of the conservation area as a whole. The harm would be at the lower end of the spectrum of less than substantial, thus engaging paragraph 202 of the NPPF.

**5.6** The NPPG (reference ID: 18a-019-20190723) states that:

*An unlisted building that makes a positive contribution to a conservation area is individually of lesser importance than a listed building. If the building is **important** or **integral** to the character or appearance of the conservation area, then its proposed demolition **is more likely to amount to substantial harm** (with added emphasis, and note that this refers to substantial harm rather than total loss).*

**5.7** The key question, therefore, is whether the building is 'important' or 'integral'. There is guidance from Historic England guidance which can be considered useful in determining the degree to which a building contributes to a conservation area and thereby informing the principle of demolition in conservation areas. This guidance is contained in Historic England's publication *Conservation Area Appraisal, Designation and Management: Historic England Advice Note 1, February 2016* (revised February 2019), wherein is a checklist of 12 questions to be asked when considering whether a building makes a positive contribution to a conservation area.

**5.8** There is a formally adopted character appraisal of the conservation area (September 2007) but No 25 Ham Farm Road is not identified as a Building of Townscape Merit or a positive contributor to special character and appearance. Nonetheless, the building's positive contribution to the CA's significance is acknowledged and its heritage interest as a discrete heritage asset is assessed in detail in Section 4. While the building's contribution is positive, it is clearly quite limited and hence it is fair and reasonable to assess the building against the HE criteria (see table below).

**5.9** The 12 questions, which have been in existence for well over a decade (there were originally 10 questions) are predicated upon the following statement in the paragraph addressing "*Positive Contributors*": "*A positive response to one or more of the following may indicate that a particular element within a conservation area makes a positive contribution, provided that its historic form and value have not been eroded.*" It is important to read the above statement carefully. Although it indicates at face value that a single positive response could mean that a building

makes a positive contribution, it is qualified by the words “may indicate”. Therefore, a positive response is not certain evidence of a positive contribution. Furthermore, the statement makes it clear that the responses should be treated carefully in cases where historic form and value have been eroded.

<b>Question</b>	<b>Answer</b>
<i>Is it the work of a particular architect or designer of regional or local note?</i>	Yes – the building was designed by Eric Lyons, a well know 20 <sup>th</sup> century architect well represented on the NHLE.
<i>Does it have landmark quality?</i>	No
<i>Does it reflect a substantial number of other elements in the conservation area in age, style, materials, form or other characteristics?</i>	Yes – the building is an example of post-war modernism in domestic design and is one of a number of detached houses built in the 1950s on Harm Farm Road. It also has some similarity and synergy with the grade II listed housing in the Parkley’s Estate.
<i>Does it relate to adjacent designated heritage assets in age, materials or in any other historically significant way?</i>	Yes, as noted in Section 4, the grade II listed housing in the Parkleys Estate designed by Eric Lyons is contemporary with No 25 and features characteristic materials and elements of design that are also found at No. 25.



<p><i>Does it contribute positively to the setting of adjacent designated heritage assets?</i></p>	<p>Not to any noticeable degree, though it does form part of the wider setting of Brooke Court and Spenser Court.</p>
<p><i>Does it contribute to the quality of recognisable spaces including exteriors or open spaces within a complex of public buildings?</i></p>	<p>No</p>
<p><i>Is it associated with a designed landscape, e.g. a significant wall, terracing or a garden building?</i></p>	<p>No</p>
<p><i>Does it individually, or as part of a group, illustrate the development of the settlement in which it stands?</i></p>	<p>Yes, the building comprises one of a sequence of detached private houses on Ham Farm Road which were developed to subsidise the construction of the flatted development to the south. The latter is of integral importance to the special architectural or historic character or appearance of the conservation area as a whole. The group on Ham Farm Road, however is not a cohesive or particularly well preserved example of contemporary domestic housing.</p>

<i>Does it have significant historic associations with features such as the historic road layout, burgage plots, a town park or a landscape feature?</i>	The road layout is not historic, but the house clearly has associations with the road layout and plot development dating from the early 1950s and which comprises part of the conservation area's particular character and appearance.
<i>Does it have historic associations with local people or past events?</i>	Not of any note.
<i>Does it reflect the traditional functional character or former uses in the area?</i>	No.
<i>Does its use contribute to the character or appearance of the area?</i>	Yes - As a residential building the building's use does reinforce the special architectural and historic character and appearance of the conservation area.

Figure 13: Tabular format assessment of the contribution of the building to the conservation area based on a Historic England methodology

**5.10** To summarise, No. 25 Ham Farm Road scores moderately in the HE table with 6 out of 12 of the questions answered positively. Although the building has an appreciable degree of resonance and synergy with the significance of the conservation area, it is mediocre in architectural terms and of limited historic or visual interest. As a non designated heritage asset it is of less than special interest

and its overall heritage value is low. The “*Positive Contributors*” section of Historic England’s guidance is considered relevant and in view of the responses, less weight should be attached to those in the checklist where a positive answer applies.

**5.11** There is therefore a case to be made for the building to be considered to make only a minor to moderate positive contribution to the character and appearance of the conservation area. It is considered that, given the building’s ambiguous contribution to the visual interest and quality of the street scene and modest architectural value, it does not make such a positive contribution to the conservation area that warrants an automatic presumption in favour of its preservation. In several respects the building resembles a low slung an idiosyncratic bungalow with an uninviting frontage that is dominated by its utilitarian garage block. In this respect the application proposals provide an opportunity to enhance the visual interest of the Site and its contribution to the street scene of Ham Farm Road.

## The Replacement Building

**5.12** As outlined in Section 2, Recent case law (*Dorothy Bohm & Ors v Secretary of State for Communities and Local Government & Ors [2017] EWHC 3217 (Admin)*) clarifies the position with regards to the correct application of legislation when dealing with positive contributors in conservation areas. The case law states:

*“... when considering the impact of the proposal on the CA under s.72 [of the Planning (Listed Buildings and Conservation Areas) Act 1990] it is the impact of the entire proposal which is in issue. In other words, the decision maker must not consider merely the removal of the building which made a positive contribution, but also the impact on the CA of the building which replaced it.”*

**5.13** Therefore, this application must be considered in the round, addressing not only demolition within the conservation area but also the quality and suitability of the replacement building.

**5.14** In respect of the replacement building, a high quality modern design is proposed and which builds on the positive aspects of the existing house but adapts the configuration and layout to modern living (including level access and circulation to meet DDA requirements) and current standards of insulation and sustainability. These aspects of the design should all be regarded as betterment compared to the existing dwelling and would meet the NPPF objective for achieving sustainable

development, with a notable enhancement of the environmental aspect of the Site's long term future.

**5.15** The proposed material finishes combine structural timber frame, steelwork, metal and slatted timber cladding and large expanses of glazing, commensurate with the character and appearance of the conservation area and in sympathy with the prevailing design philosophy of the existing house. Homage to the Lyons design is paid by way of the innovative use of monopitch clerestory lights, dominance of glazing to the rear and flank elevations, and the inclusion of an elegant courtyard garden to the centre of the building. While there are similarities, the proposed composition is considered to be more successful in architectural terms than the existing house. It would introduce a highly attractive new dwelling that makes a very positive contribution to local character and distinctiveness in line with paragraph 197 of the NPPF. Furthermore, the improved values of sustainability and accessibility embedded within the design of the replacement dwelling should be weighed favourably in the balance of a justifiable need for change.

**5.16** The effect of the proposed replacement dwelling would reinforce historic character and appearance by introducing a building of similar footprint to the existing, of the same height but of much improved design to the street facing side of the house. Consequently, there would be an appreciable enhancement of the street scene to Ham Farm Road, whilst maintaining the important aspect of a modern aesthetic to the detached houses on this street which combine more traditional two storey houses with less conventional flat or mono-pitched bungalows.

**5.17** The new building will be constructed with high quality, robust traditional materials including laminated timber, hardwood cladding and metal framing to the large windows and glazed sections.

## Summary

**5.18** In summary, this report has emphasized that the heritage significance of No. 25 Ham Farm Road is low. This is due to its limited architectural interest and poor quality frontage to the public highway, which tends to diminish the positive contribution it makes to the significance of the conservation area. The building can be considered to be of moderate local interest but which is insufficient to weigh heavily in favour of its retention.

**5.19** The building's loss would not result in material harm to the conservation area if one takes into account the positive contribution that the high quality replacement dwelling would make to significance by introducing a more successful architectural composition that incorporates and develops the positive aspects of the existing building's design. Overall this would have a visually enhancing effect on the street scene and character of this part of the conservation area. Thus the proposed architectural design is both sympathetic and draws from the local character and distinctiveness of the local environment.

**5.20** Accordingly, there would be preservation and enhancement for the purposes of the decision maker's duty under Section 72(1) of the Act. Paragraph 202 of the NPPF is not engaged. The significance of the Parkleys Estate Conservation Area would be sustained in compliance with paragraph 197 of the NPPF.

## Effects upon No. 25 Ham Farm Road

**5.21** The first thing to reiterate here is that No. 25 Ham Farm Road is not statutorily listed and therefore not subject to paragraphs 201 and 202 of the NPPF. However, the building is being considered for inclusion on the council's list of Buildings of Townscape Merit and is treated as a non-designated heritage asset for the purpose of this assessment.

**5.22** The proposed demolition of the building will entirely remove the intrinsic heritage significance of this building. However, the level of heritage value it retains is low for the reasons set out in Section 4 (paragraphs 4.9 – 4.29)

**5.23** In general terms, No.25 Ham Farm Road is visually not of real quality and lacks the architectural refinements and consistency that might weigh heavily in favour of its retention. Furthermore, the building does not share any appreciable group value with other heritage assets, including the sequence of buildings of townscape merit further west along Ham Farm Road.

**5.24** The policy tests set out for non-designated heritage assets are clearly more limited than those relating to designated heritage assets (including paragraphs 199 to 202 of the NPPF). All that is required by paragraph 203 in respect of non-designated heritage assets is that the effect of an application on the significance of that asset should be taken into account (Paragraphs 44-46 of Travis Perkins (Properties) Ltd V

Westminster City Council & Ors [2017] EWHC 2738 (Admin)). In full, this policy notes that:

*"The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."*

**5.25** The same case law referred to in paragraph 5.10 above (*Dorothy Bohm & Ors v Secretary of State for Communities and Local Government & Ors [2017] EWHC 3217 (Admin)*) clarifies the position with regards to the correct application of planning policy 203 (this case refers to the NPPF 2012 paragraph numbering but remains valid as paragraph 135 and 203 are verbatim).

*"34. Secondly, the Inspector also had to apply the policy test in para 135 of the NPPF. Unsurprisingly, given that an NDHA does not itself have statutory protection, the test in para 135 is different from that in paras 132-4, which concern designated heritage assets. Paragraph 135 calls for weighing "applications" that affect an NDHA, in other words the consideration under that paragraph must be of the application as a whole, not merely the demolition but also the construction of the new building. It then requires a balanced judgement to be made by the decision maker. The NPPF does not seek to prescribe how that balance should be undertaken, or what weight should be given to any particular matter."*

**5.26** Therefore, with regards to the non-designated heritage asset assessed in this report, this application must be weighed as a whole, i.e. not merely the demolition of No. 25 Ham Farm Road but also the construction of the replacement building. The benefits of the proposed scheme, outlined in the planning statement, are also of importance.

**5.27** To sum up then, this report has emphasized that the heritage significance of No. 25 Ham Farm Road, is low, being of moderate local interest but insufficient to weigh significantly in favour of its retention. There would be some limited harm to the local historic environment because of its loss, but this should be weighed in the planning balance with the benefits of the proposed replacement dwelling, which include the visual enhancement and architectural interest of this part of the

conservation area. The impact of the loss will be further reduced by the architectural quality, relevance and enhancing effect of the replacement building on the significance of the Parkleys Estate Conservation Area and the other NDHAs located on Ham Farm Road.

## Summary of effects

- 5.28** In summary the proposal will not result in any harm to any designated heritage assets. The special character and appearance of the Parkleys Estate Conservation Area would be preserved and enhanced in compliance with paragraph 206 of the NPPF and for the purposes of the statutory duty under Section 72(1) of the Act.
- 5.29** The total loss of No. 25 Ham Farm Road would result in some harm to heritage significance engaging paragraph 203 of the NPPF on the basis of its being treated as a non-designated heritage asset. This requires the scale of the harm or loss and significance of the heritage asset to be weighed as part of a balanced judgement. The limited heritage value of the subject building is not considered to weigh significantly in favour of its retention and the Proposed Development would enhance the street scene and character of Ham Farm Road and the conservation area as a whole. Thus, the Proposed Development is considered acceptable in heritage terms.
- 5.30** Paragraphs 201 and 202 of the NPPF are not engaged. There is no harm for the purposes of paragraphs 199-200 of the NPPF or for the exercise of the statutory duty under sections 66(1) and 72(1) of the Act. There would be no conflict with any local policies.

## 6. Conclusion

- 6.1** The heritage value of No. 25 Ham Farm Road is low in a national context. Heritage significance derives from its associations with Eric Lyons, plan form and the application of Modernist design principles to a modest domestic building. The building brings little visual interest to the street scene, but is of some historical value in the context of the Parkleys Estate and the development of the larger detached houses and bungalows in individual plots along Ham Farm Road. These helped to subsidise the court block housing within the estate.
- 6.2** The importance of Parkleys is recognised through the grade II listing in 1998 of the flatted development designed by Eric Lyons and the designation of the conservation area (which includes Ham Farm Road and No. 25) in 2003. No. 25 Ham Farm Road is treated as a non-designated heritage asset for the purpose of this assessment. The building's contribution to the special character and appearance of the Parkleys Estate Conservation Area is positive but modest and no more than moderate.
- 6.3** Although the building has undergone some refurbishment it remains substantially intact, including original windows and internal plan form, but this does not displace the building's inherent shortcomings from an architectural perspective and in terms of its overall heritage value, which is low.
- 6.4** No. 25 Ham Farm Road scores moderately when assessed against Historic England criteria for demolition of unlisted buildings within a conservation area, despite its putative status as a non-designated heritage asset.
- 6.5** Based on demolition alone, the application proposals would cause harm in respect of paragraph 206 of the NPPF, but the harm in question would be less than substantial (thus engaging paragraph 202 of the NPPF). However, as elucidated above, case law affirms that when dealing with positive contributors in conservation areas, the application of Section 72(1):

*'requires the overall effect on the CA of the proposal to be considered. There is no requirement for a two stage process by which the demolition part of an*



*application has to be considered separately from the proposed new development.*<sup>23</sup>

*'In other words, the decision maker must not consider merely the removal of the building which made a positive contribution, but also the impact on the CA of the building which replaced it.'*<sup>24</sup>

- 6.6** Therefore, this application must be considered in the round, addressing not only demolition within the conservation area but also the quality and suitability of the replacement building.
- 6.7** The proposal to demolish the existing building and replace it with a new bungalow of elegant Modernist design that integrate successfully with the street scene and indeed enhances the architectural interest of the Site will reinforce the special character and appearance of the conservation area. The development would not result in any harm to its significance for the purposes of paragraph 199 of the NPPF.
- 6.8** As a NDHA, the loss of no. 25 Ham Farm Road engages paragraph 203 of the NPPF. This requires the scale of the harm or loss to be weighed as part of a balanced judgement. The limited heritage value of the building does not weigh significantly in favour of its retention and the Proposed Development would preserve the special character and appearance of the conservation area and setting of the other NDHAs on Ham Farm Road. No other heritage assets would be affected. Thus, the Proposed Development as a whole is acceptable in heritage terms.
- 6.9** Paragraphs 201 and 202 of the NPPF are not engaged and the Scale of Harm table at **Appendix 1** of this report does not apply. There is preservation for the purposes of the decision maker's duty under Sections 66(1) and 72(1) of the 1990 Act.
- 6.10** Furthermore, the use of high-quality materials and locally relevant design and landscaping will reinforce the positive visual impact of the proposed replacement building. Together with much improved accessibility and all round sustainability, this will ensure the long-term effect of the development is consistent with the NPPF's primary objective of achieving sustainable development. The Proposed Development would also provide a public benefit in the form of an improved residence of very

---

<sup>23</sup> Dorothy Bohm & Ors v Secretary of State for Communities and Local Government & Ors [2017] EWHC 3217 (Admin) p. 36.

<sup>24</sup> *Ibid.* p. 33.

high quality design, which can be weighed in the planning balance, along with improvements to the street scene of Ham Farm Road.

**6.11** Paragraph 206 of the NPPF recommends that *'Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.'* In this case, the proposed development will preserve the significance of the Parkleys Estate Conservation Area in line with paragraph 206.

**6.12** The proposed development complies with all local and regional policies relating to the historic environment. The Council is invited to treat the proposal favourably in compliance with paragraph 206 of the NPPF.

# Appendix 1

## *Scale of Harm (HCUK, 2019)*

The table below has been worked up by HCUK Group (2019) based on current policy and guidance. It is intended as simple and effect way to better define harm and the implications of that finding on heritage significance. It draws on various recent appeal decisions and reflects the increasing importance being put on the contribution of setting to significance and the need to create a greater level of clarity within the finding of less than substantial harm (see the NPPF, paragraph 194-196). This has been proving more and more necessary and the table below goes some way to reflect the most recent updates (2019) to the guidance set out within the NPPG<sup>25</sup>

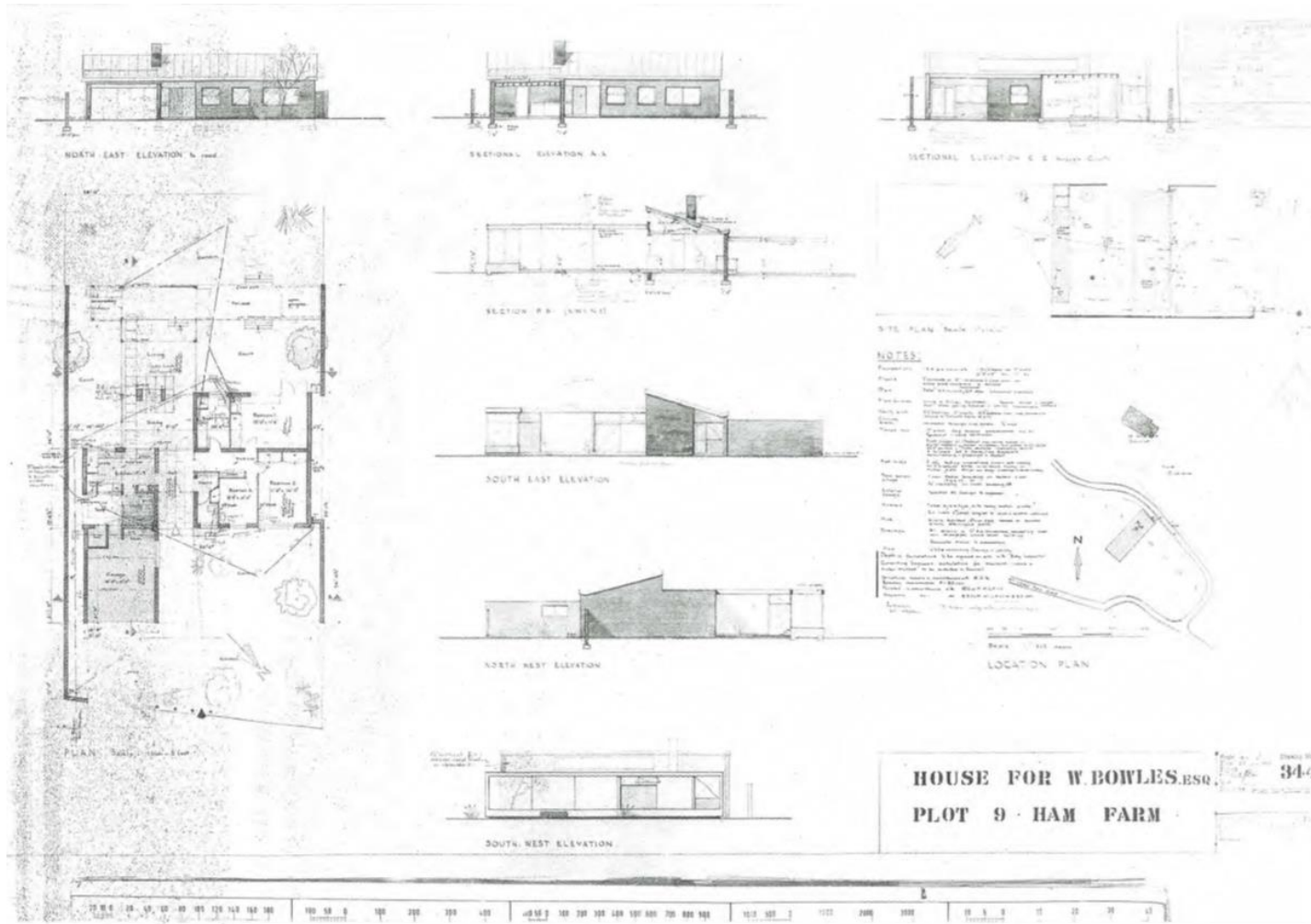
<b>Scale of Harm</b>	
Total Loss	Total removal of the significance of the designated heritage asset.
Substantial Harm	Serious harm that would drain away or vitiate the significance of the designated heritage asset
Less than Substantial Harm	High level harm that could be serious, but not so serious as to vitiate or drain away the significance of the designated heritage asset.
	Medium level harm, not necessarily serious to the significance of the designated heritage asset, but enough to be described as significant, noticeable, or material.
	Low level harm that does not seriously affect the significance of the designated heritage asset.

HCUK Group, 2019

<sup>25</sup> See NPPG 2019. Section: 'How can the possibility of harm to a heritage asset be assessed?'. Paragraph 3, under this heading notes that '*within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.*'

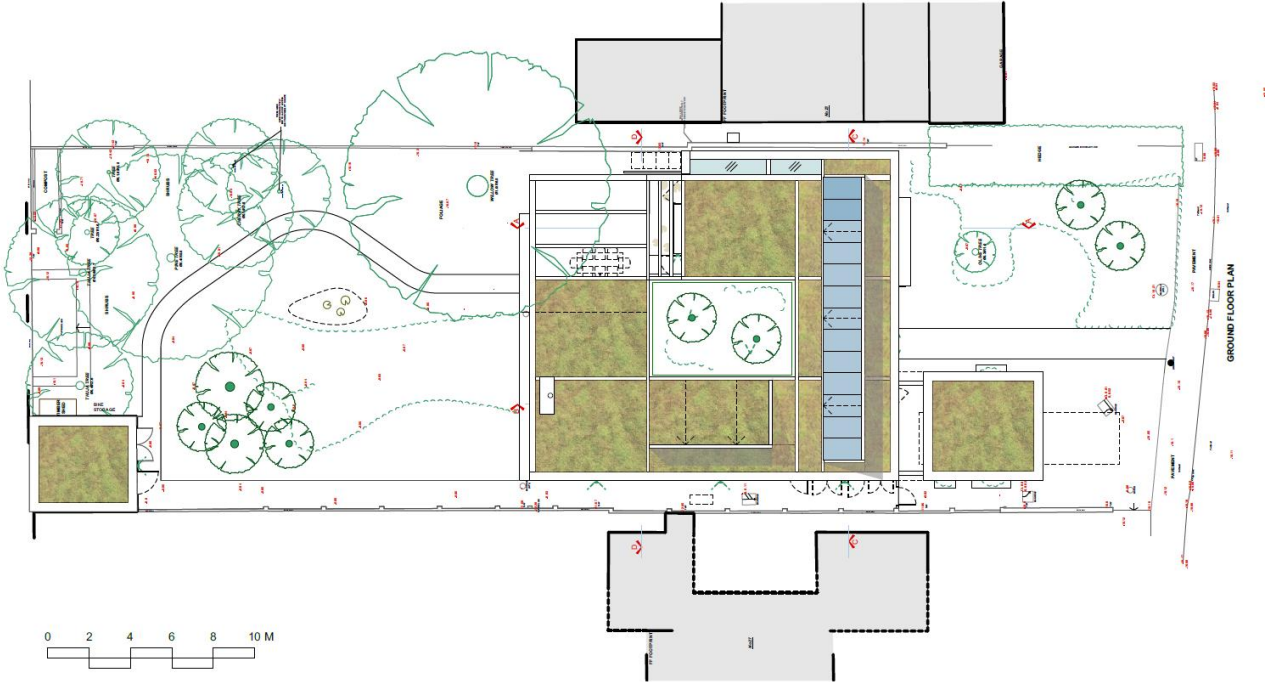
# Appendix 2

Planning Application No. 7297, 30/08/1954 - Archive plan drawings, 25, Ham Farm Rd

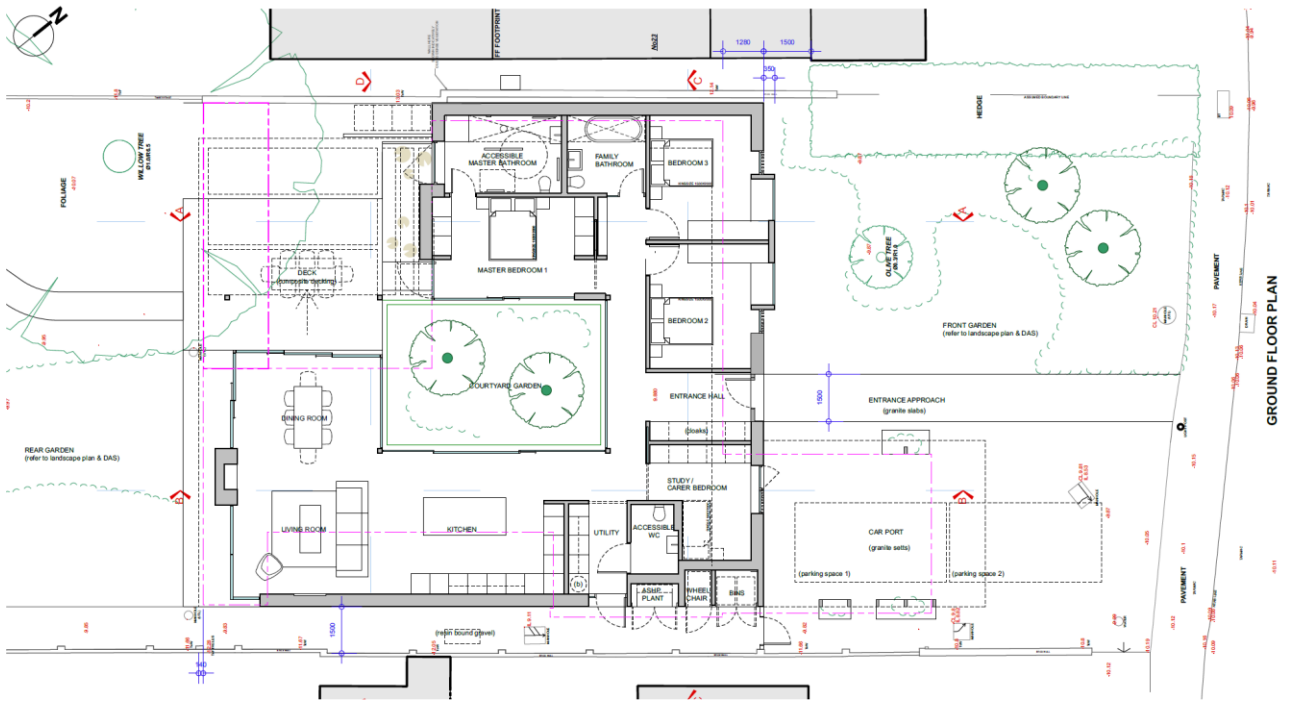


# Appendix 3

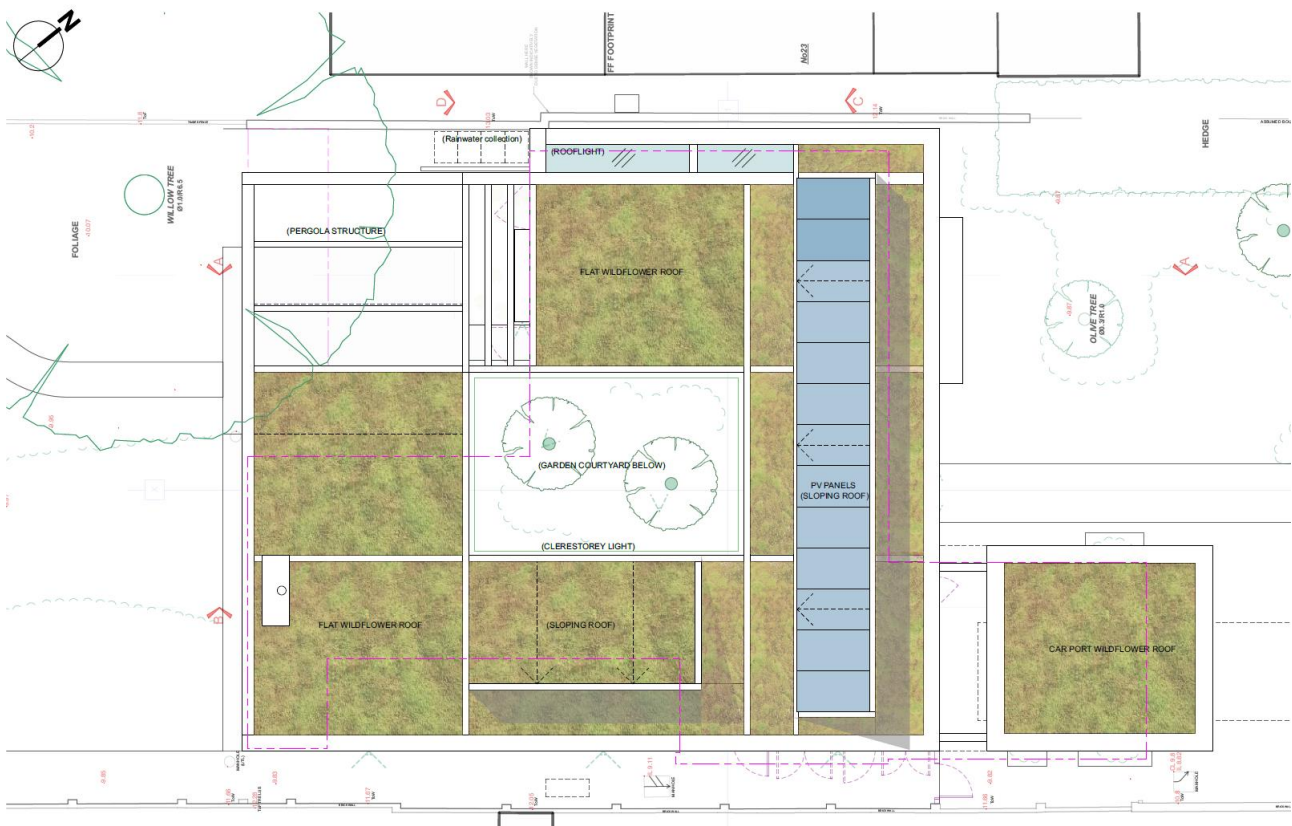
*Proposed Scheme Details (Proctor and Shaw, Architects Ltd)*



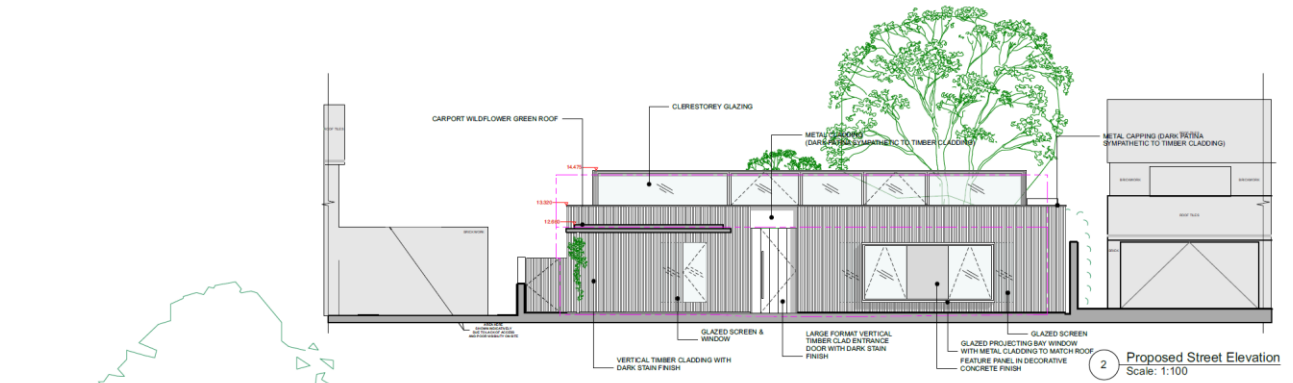
1 Proposed Site Plan  
Scale: 1:200



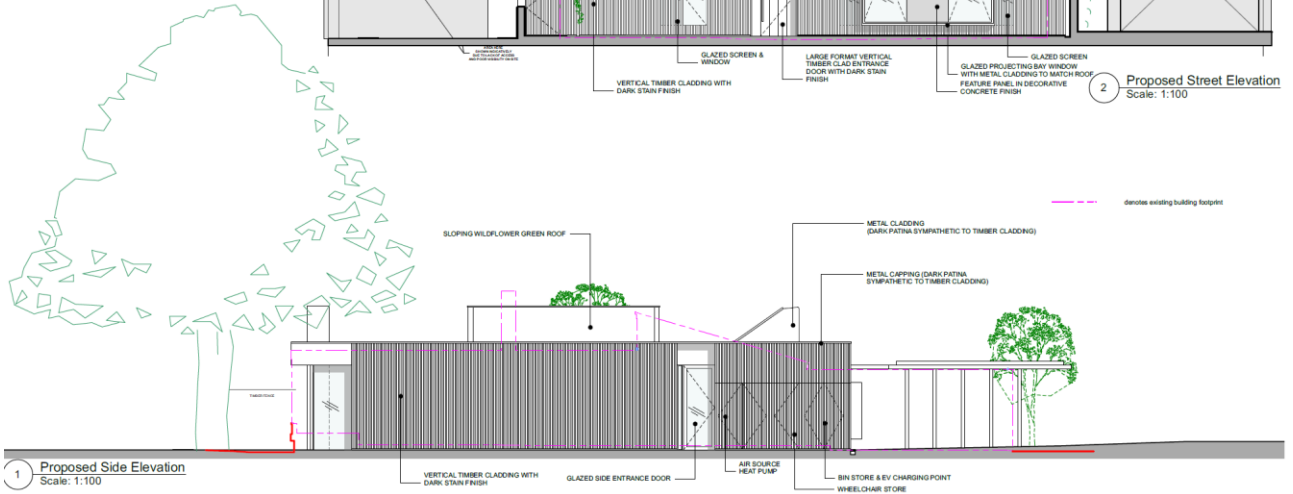
Proposed ground floor plan



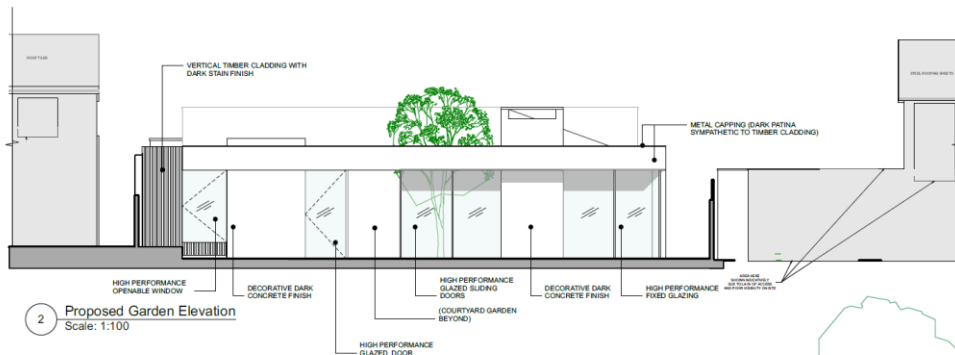
Proposed Roof Plan



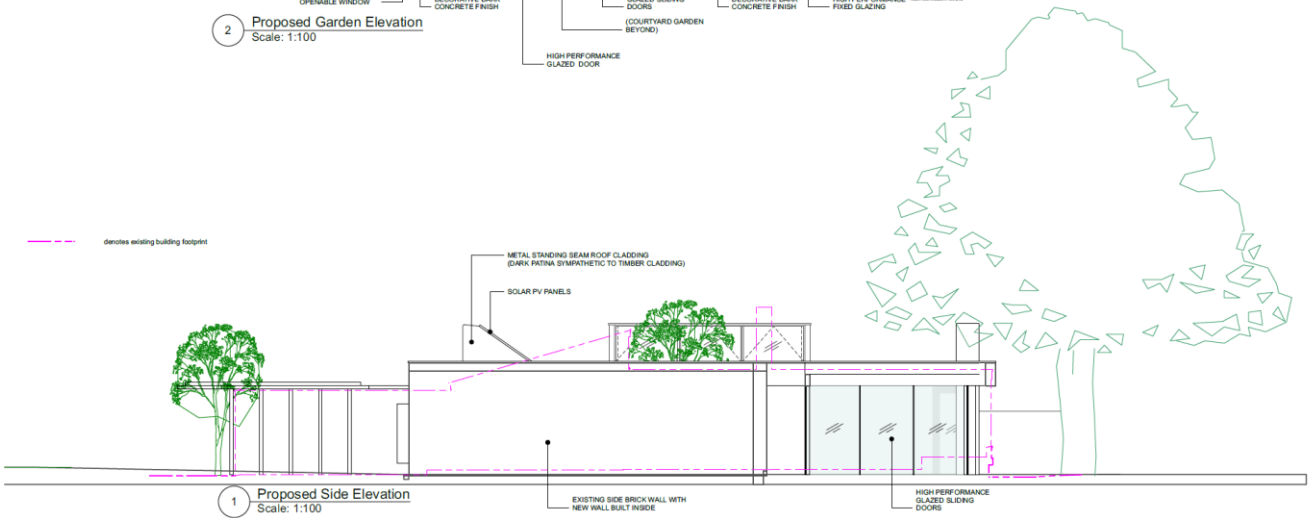
2 Proposed Street Elevation  
Scale: 1:100



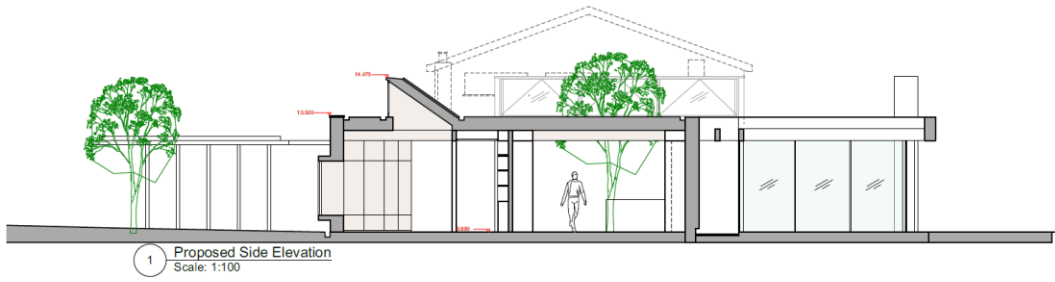
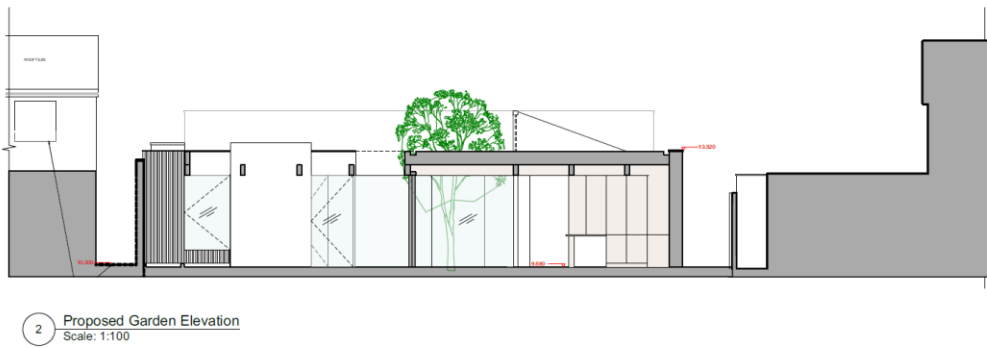
1 Proposed Side Elevation  
Scale: 1:100



2 Proposed Garden Elevation  
Scale: 1:100



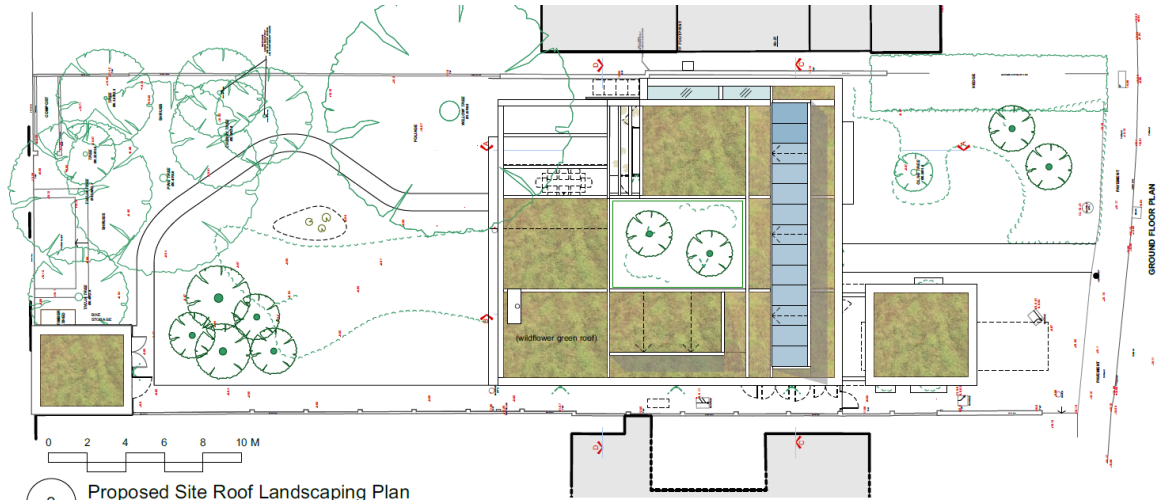
1 Proposed Side Elevation  
Scale: 1:100







KEY:  
WILDFLOWER GREEN ROOF



2 Proposed Site Roof Landscaping Plan  
Scale: 1:200

KEY:  
BUILDING FOOTPRINT  
OTHER SURFACE (IMPERMEABLE)  
PERMEABLE SURFACE  
LAWN  
OTHER PLANTED SURFACES  
POND  
BIODIVERSE PLANTING  
WILDFLOWER GREEN ROOF  
EDIBLE GARDEN PLANTING



1 Proposed Site Ground Floor Landscape Plan  
Scale: 1:200



*CGI of the proposed replacement dwelling – north elevation to Ham Farm Road*



*CGI of the proposed replacement dwelling – south elevation to garden*



*CGI of the proposed replacement dwelling – interior view looking west*

## *Standard Sources*

<https://maps.nls.uk>

<https://historicengland.org.uk/listing/the-list>

[www.heritagegateway.org.uk](http://www.heritagegateway.org.uk)

<http://magic.defra.gov.uk>

[www.history.ac.uk/victoria-county-history](http://www.history.ac.uk/victoria-county-history)

The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). Historic England (2017 edition)

Planning (Listed Buildings and Conservation Areas) Act, 1990

National Planning Policy Framework, 2019

National Planning Practice Guidance, 2019

Conservation Principles, Policies and Guidance, Historic England (2008)

## *Other Sources*

### Bibliography

Simms, B. (ed.) 2017. *Eric Lyons & Span*. 2nd Edition. RIBA Publishing: London.

Cherry, B. & Pevsner, N. 2002. *The Buildings of England. London 2: South*. 2nd Edition. Yale University Press: New Haven & London.

Jensen, L. 2017. <http://hamiswheretheheartis.com/ham-by-topic/housing/ham-farm-road/>

Park, J. 1958. *Houses and Bungalows*. BT Batsford Ltd: London.

<https://homespunvintagetelegram.wordpress.com/2010/02/15/58/>

<http://hamiswheretheheartis.com/ham-by-topic/housing/ham-farm-road/>

[http://www.cambridge2000.com/modern/html/architect/Leslie\\_Gooday\\_Associates.html](http://www.cambridge2000.com/modern/html/architect/Leslie_Gooday_Associates.html)

<http://daveanderson.me.uk/houses/richmondsouth.html>