

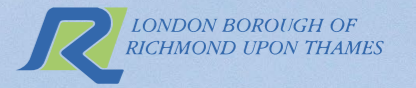
Ham Close Regeneration

Planning Application:

ES Volume III:

Heritage, Townscape and
Visual Impact Assessment

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Project

Ham Close Estate, Richmond Upon Thames

Client

Hill Residential

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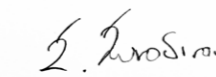
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Disclaimer

Assumptions and Limitations

This report is compiled using primary and secondary information derived from a variety of sources, only some of which have been directly examined. The assumption is made that this data, as well as that derived from other secondary sources, is reasonably accurate.



25.05.2022

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1. Introduction

- 1.1 Savills Heritage and Townscape (hereafter 'the consultants' or 'the consultancy') have been appointed by Hill Residential (hereafter 'the applicant') to provide heritage, townscape and visual impact advice and to prepare a Heritage, Townscape and Visual Impact Assessment (HTVIA) in relation to a redevelopment scheme at Ham Close, Ham, Richmond Upon Thames (hereafter 'the Proposed Development'). This HTVIA forms Volume 3 of the Environmental Statement (ES). This HTVIA only assesses above ground heritage assets. For below ground archaeology please refer to Chapter 4 of the ES.
- 1.2 The Proposed Development will be located within Ham, on an area of land bound by Ham Street to the east, Woodville Road to the north, the sport grounds of St Richards CE primary school to the west and Ashburnham Road to the south (hereafter 'the Site', figure 1.1).
- 1.3 The consultants have collaborated with the design team including BPTW for the residential blocks, WRAP for the community centre and Maker Labs, and Land Use Consultants (LUC) for landscape; by providing design feedback and assessing the potential heritage, townscape and visual effects of the Proposed Development in an iterative process, including through the use of Vu.City software in-house during the design process and selection of views.
- 1.4 The aim of this HTVIA is to assess the likely residual and cumulative effects of the Proposed Development on the setting and importance of heritage assets in the vicinity of the Site, on the townscape as a whole, and on visual amenity within the local and wider townscape surrounding the Site.
- 1.5 The process of selecting candidate viewpoints for visual assessment was carried out in detailed consultation with planning officers at London Borough of Richmond Upon Thames (LBRuT) and with reference to the local guidance on heritage, townscape and views. The local planning authority were consulted to ensure that any strategic and local townscape views of importance to LBRuT are included in this study.
- 1.6 As a result of this, a set of 22 townscape views were selected by the consultants to assess the potential effects of the Proposed Development on visual amenity. This proposed set also includes the additional suggested viewpoints by the officers at LBRuT (views 17, 18, 19, 20, 21, and 22), following the scoping response. Assessments are based on AVRs produced by visualisation specialists Rockhunter, which provide both quantitative and qualitative evidence of the likely visual effects of the Proposed Development.
- 1.7 This document should be read alongside the Design and Access Statement (DAS) and plans produced by the architects and the Planning Statement produced by Sphere 25 planning consultancy.
- 1.8 The sections of this report are as following: the legislations and planning policy context are presented in section 2.0, HTVIA ES Methodology is presented in section 3.0, Assumption and limitations in section 4.0, Historic Background in section 5.0, The Site and Surrounding Baseline Condition in section 6.0, The Proposed Development in section 7.0, Potential impacts and effects in section 8.0 (including: Effects During Demolition and Construction, Effects on Visual Receptors, Effects on Townscape Receptors, Effects on Heritage Receptors, and Mitigation in section 9.0, Residual impacts/effects in section 10.0 and Conclusion in section 11.0. In addition Rockhunter's methodology is presented in Appendix 1.0.



Figure 1.1: Aerial photograph showing the location of the site, outlined in red.

2. Legislation and Planning policy context

2.1 The assessment methodology set out in section 3.0 of this report has been informed by policy and guidance at a national, regional and local level with regards to Environmental Impact Assessment (EIA), heritage, urban design, townscape and visual impact, as listed below. The policy and guidance mentioned is publicly accessible information, so its text is not reproduced in this document. For a full assessment against policy and guidance the reader is referred to the Planning Statement submitted by Sphere25 Planning Consultancy as part of this application.

Local, regional and national policy

- EU Directive 85/387/EEC as amended by Directives 97/11/EC, 2003/35/EC, 2011/92/EU, and 2014/52/EU;
- Town and Country Planning (Environmental Impact Assessments) Regulations, 2017/571;
- Ministry of Housing, Communities & Local Government (MHCLG), *National Planning Policy Framework*, July 2021;
- Planning (Listed Buildings and Conservation Areas) Act, 1990;
- Greater London Authority (GLA), *The London Plan, Spatial Development Strategy for Greater London*, March 2021 including *Policies: D4: delivering good design, D5: inclusive design, D8: public realm, D9: tall buildings; and policy HC1 on heritage*;
- London Borough of Richmond Upon Thames Local Plan;
 - Adopted Local Plan July 2018 (Two legal challenges were made regarding the adoption of the Local Plan. On 3 March 2020, the Council adopted the two matters related to the legal challenges within the Local Plan); *policy LP1: local character and design quality, policy LP4 on building heights, policy LP5: views and vistas, policies LP3 and LP4 on designated and non-designated heritage assets*;
 - Draft Local plan (consultation Autumn 2022, submission and examination spring 2023-spring 2024, adaptation autumn 2024) ;
 - Adopted Local Plan- Proposals Map, July 2015;
- Neighbourhood plans: Ham and Petersham Neighbourhood Plan 2018-2023
- London Borough of Richmond Upon Thames supplementary planning documents
 - Design Quality, January 2006;
 - Borough wide Sustainable Urban Development Study, 2008;
 - Security by Design, 2002;
 - Residential Development Standards, March 2010;
 - Buildings of Townscape Merit, May 2015;
 - Relevant Conservation Area statements: Ham Common CA, and Ham House CA.
- Historic England's Advice Note 2 – Managing Significance in Decision-Taking in the Historic Environment, March 2015;
- Historic England's Advice Note 3 (2nd Ed.) – The Setting of Heritage Assets, December 2017;
- Historic England's Advice Note 4 – Tall Buildings, March 2022;
- Historic England's Advice Note 12 - Statements of significance, October, 2019;
- Historic England, Heritage at Risk Register, 2017;
- Historic England's Listed Buildings Register;
- London's Natural Signatures: The London Landscape Framework, (prepared for Natural England, January 2011)

Guidance and Best Practice

- Department of the Environment, Preparation of Environmental Statements for Planning Projects that Require Environmental Assessment, Good Practice Guide 1995;
- The Guidelines for Environmental Impact Assessment (2004) Institute for Environmental Management and Assessment;
- The Landscape Institute and Institute of Environmental Management and Assessment, Guidance for Landscape and Visual Impact Assessment (GLVIA) Third Edition, 2013;
- Ministry of Housing, Communities & Local Government (MHCLG), Planning Practice Guidance, On-line Resource, 2016, latest updated in October 2019;
- Photography and photomontage in landscape and visual assessment, Landscape Institute Advice Note 01/11, 2011;
- Character and Context Supplementary Planning Guidance, Mayor of London, June 2014;

3. Assessment Methodology

Introduction

3.1 This section sets out the assessment methodology developed and used by the consultancy for this Heritage, Townscape and Visual Impact Assessment (HTVIA) document, which forms Volume 3 of the ES. This methodology is used to establish the likely significant effects of the Proposed Development, both in isolation and cumulatively, on the nearby heritage assets, on townscape and on visual amenity. The topics covered in this section and the previous section include: policy and guidance informing the assessments; the EIA scoping process; mitigation of effects through design and consultation; effects on the significance (or importance) of heritage assets; effects on townscape and visual receptors; cumulative effects; effects during demolition and construction; and authorship. Assumptions and limitations are covered in section 4.0 of this HTVIA report.

3.2 When assessing the impacts of a new proposed development within an urban environment there is often an overlap between the resulting effects on: the setting and significance (or importance) of built heritage assets, known as 'heritage receptors'; certain characteristics or descriptors of the townscape, known as 'townscape receptors'; and people experiencing the townscape in a visual way, known as 'visual receptors'. This is why they are assessed in the same document, albeit using slightly different methodologies, following current policy and guidance. Where the assessment of visual effects has also informed the heritage or townscape assessments, for example by illustrating the expected changes to the setting of a heritage asset in a visual way, a cross reference is provided to the relevant views.

The EIA scoping process

3.3 The scope of the ES HTVIA follows the agreed heritage, townscape and visual impact considerations addressed in the 'scoping report', submitted to London Borough of Richmond Upon Thames in November 2021, along with a Heritage and Townscape note, which included a Vucity study of selected viewpoints (total viewpoints was 16). A scoping opinion by LBRuT was received in January 2022, which stated that a number of additional views had to be included. The consultants submitted a further Heritage and Townscape Note Addendum (Appendix 3) which illustrated all the requested views in Vucity. Following this study, some of the requested views were scoped out due to limited or no visibility of the Proposed Development and some were included, taking the total number of viewpoints to be assessed in the HTVIA to 22.

3.4 The scoping opinion of LBRuT regarding heritage and townscape issues were as following:

"Main report comments – Introduction Recommendations and comments:

- Take into account Ham and Petersham neighbourhood Plan and Urban Design Study
- Development affecting the setting of a heritage asset is a direct environmental effect in terms of EIA definitions and may constitute a significant effect. It is strongly recommended that the involvement of professional historic environment and landscape advice/consultancy is sought from the outset of the EIA and application process.
- The assessment should refer to the relevant National Character Areas which can be found on Natural England's website
 - o Natural England - National Character Area Profiles - Natural England (nationalcharacterareas.co.uk)
 - o NCA Profile:115 Thames Valley - NE379 (naturalengland.org.uk)
 - o National Character Area profiles: data for local decision making - GOV.UK
- Main report comments - Potential Effects Comments / recommendations
 - Ham House, Grade I Listed, is not included in para. 6.16, which it should be.
 - Paragraph 6.16 and Appendix 2 Paragraph 14 read differently when referring to heritage receptors.

- o Inconsistent heritage assets listed,
- o Inconsistent approach to assessing impact – para. 6.16 proposes they are not individually assessed and instead included for review as part of the conservation area, and para. 14 states Grade I or 11* will be individually assessed, and Ham House Registered Park and Garden and Ham House will be groups together and assessed as one. This can be resolved by noting the need to assess the impact on individual listed buildings and their settings in the areas around the site, and in particular Beaufort House and Newman House which are the closest to the site.
- Disagree with last sentence of para 6.16 – "It is proposed that where any designated and non-designated heritage assets are located within Ham House or Ham Common Conservation Area, they are not individually assessed, but are instead included for review as part of the conservation". Heritage assets (designated and non-designated), including their setting and significance, within the CAs should be assessed separately to CAs, in particular Beaufort House and Newman House, which are the closest to the site. It is important to understand the form, materials and history of any designated and non-designated heritage assets, and this will for example differ for LBs and CAs. This differentiation is important to understand the impact of the proposed EIA development on the relevant significance of the identified heritage assets, especially as it is expected that the proposed EIA development will be visible from the setting of, or in conjunction with, a range of heritage receptors. In turn this will then assist the applicant in avoiding, minimising and mitigating any potential negative impacts on the identified heritage assets, including providing an opportunity to identify ways of better revealing or enhancing their significance.
- The potential impacts and likely significant effects on Ham House CA should be carefully considered, and indeed this CA may warrant greater attention compared to the others due to its proximity to the site.
- The two Other Open Land of Townscape Importance should be included for Visual Impact Assessment.
- Natural England expects consideration to the landscape and visual effects on Open Access land, whether direct or indirect, to be included.
- Additional viewpoints recommended:
 - o Viewpoint from the cluster of LBs around the Manor House & stables a little further up Ham Street.
 - o From the school OOLTI to the west of the site; and representative view from Woodville & Ashburnham Roads.
 - o Couple of additional ones which may be beneficial in terms of assessing impact on heritage assets – to be agreed with LPA – Beaufort House and the Algernon Tollemache Almshouses
 - o From the road adjacent to the Palm Centre and Ham House stables.

- o A number of key view corridors are defined both close into the site and from further afield. It may be worth checking to ensure these are comprehensive and sufficiently account for vistas around the site (e.g. it might be appropriate to seek an additional view assessment further north on Ham Street, the northern equivalent of the long view denoted by the View 1 arrow in Appendix 2).
- o Metropolitan Open Land at Grey Court
- o From Ham House vista
- o Back Lane – looking towards the community centre
The effects will be assessed through the study of AVRs, to be produced by a visualisation specialist. The Council advocates 3D modelling is used (such as VUCITY) for the visualisations of the impact on views of the proposed EIA development."

3.5 The above comments have largely been addressed and incorporated within the HTVIA. Where this is not the case, in particular relating to views, this has been sufficiently justified in the Heritage and Townscape Note Addendum (Appendix 3). In May 2022 LBRuT also requested that Views 4 and 10 be provided as renders instead of wirelines in the HTVIA.

Geographical Scope

3.6 In order to capture all built heritage assets which have the potential to be impacted by the Proposed Development, and having regard to the size of the Site and its topography, a specific study area centred on the Site has been scoped in to the assessment.

3.7 A study area of a 500 meters radius from the boundary of the Site was utilised in producing the heritage assessment component of this HTVIA. This is considered an appropriate study area to be assessed. Where applicable, this radius can also be applied to the townscape assessment, based on professional judgement. Some townscape viewpoints informing the assessment may be at a much longer distance from the Site, depending on designated views, the topography of the site and other considerations, and therefore extending the visual study area beyond the heritage and townscape study area.

<p><u>Temporal Scope</u></p> <p>3.8 The temporal scope will assess the likely impacts (and the magnitude of change arising from these impacts) that the Proposed Development will have on heritage, townscape and visual receptors during the demolition/construction and operational stages. For the operational stages, the Proposed Development will be assessed in isolation and also cumulatively, in combination with other relevant emerging schemes in the context of the Site.</p>	<p>iii. Formulate an assessment of the likely effects of the Proposed Development on the significance of the known above ground heritage assets and their settings.</p>	<p>b) The 'setting' of a heritage asset is the surroundings in which a heritage asset is experienced. Its extent is not fixed, can extend beyond the asset's curtilage and may change as the asset and its surroundings evolve. Elements of a 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 (NPPF, Annex 2 Glossary);</p> <p>c) 'Significance' (for heritage policy), as defined in the NPPF (Annex 2 Glossary) is used to describe the heritage interest of an asset to this and future generations. This interest may be archaeological, historic and/or architectural/artistic. Significance can derive not only from a heritage asset's physical presence, but also from its setting.</p>	<p><u>Assessing the sensitivity to change of the heritage receptor</u></p> <p>3.18 The NPPF defines significance as 'The value of a heritage asset to this and future generations because of its heritage interest. That interest may be historic, archaeological, architectural or artistic.' The determination of the significance of a heritage asset is based on statutory designation and/or professional judgement against these values:</p> <ul style="list-style-type: none"> • <i>Archaeological interest</i>: deriving from the potential of a place to yield evidence about past human activity that is worthy of expert investigation; • <i>Historic interest</i>: an interest in past lives and events. It tends to be illustrative or associative. Providing a material record of the nation's past, it can also provide meaning for communities derived from their collective experience of a place and it can symbolise wider value such as faith or cultural identity; and • <i>Architectural and artistic interest</i>: interest from the design or general aesthetics of a place. Derived from conscious design or fortuitously through evolution. More specifically, it relates to the science of design, construction, craftsmanship and decoration. Artistic interest is an interest in other human skill, such as sculpture.
<p>Mitigation through design and consultation</p> <p>3.9 A number of design options have been explored, making it an iterative design process, in which the consultants have been involved in providing advice to the design team.</p> <p>3.10 As part of the design development process the consultancy advised the design team on ways to mitigate, as far as possible, any potential adverse effects of the Proposed Development on the setting and significance of nearby heritage receptors, the townscape and visual receptors, while maximising any beneficial effects available. This process included the use of 3D computer models to illustrate the effects of different design options.</p>	<p><u>Baseline data collection</u></p> <p>3.13 In order to determine the built heritage assets which may be sensitive to the Proposed Development a broad range of documentary and cartographic sources and historic environment datasets will be examined in order to determine the likely nature, extent, preservation and significance of any known or possible heritage assets that may be present within or in the vicinity of the Site. Sources consulted may include Historic England's National Heritage List for England (NHLE), the Historic Environment Record of the LBRuT where the Site lies, conservation area appraisals and locally listed building records of the local planning authority and neighbouring local planning authorities (where necessary), regional and local archives and libraries, and online digital records and historic maps, among other sources.</p>	<p><u>The assessment process</u></p> <p>3.16 Following the characterisation of the baseline environment, the methodology used to assess the likely environmental effects on potential above ground heritage assets at, or in the vicinity of, the Site will entail:</p> <ol style="list-style-type: none"> i. Evaluating the significance/importance of heritage assets, based on existing designations and professional judgment where such resources have no formal designation, and considering historic, archaeological, architectural/artistic interest as outlined in the NPPF and Historic England's policy and guidance. This significance then translates into the 'sensitivity to change' of the heritage receptor; ii. Evaluating the contribution that setting makes to the overall significance (or 'sensitivity to change') of above ground heritage receptors selected for assessment; iii. Predicting the 'magnitude of change' upon the known or potential significance of heritage receptors and the likely resulting scale of environmental effects from the Proposed Development; iv. Considering the mitigation measures that have been included within the design of the development and any additional mitigation that might be required in order to avoid, reduce or off-set any significant adverse effects; and v. Quantifying any residual effects (those that might remain after mitigation). 	
<p>3.11 A brief description of the Proposed Development is provided in section 7.0. The reader is encouraged to read this HTVIA alongside the BPTW's Design and Access Statement (DAS) and plans. Given the above design development process, it is considered that mitigation is embedded in the designs and that it is unlikely that any further or 'supplementary mitigation' will be needed. If necessary, however, it would be clearly stated in the assessments.</p>	<p>3.14 In order to produce the heritage assessments Site visits were undertaken in September 2021. A walkover of the Site and environs was completed, to study the topography and existing land use, the nature of the existing buildings on and around the Site, to identify any built heritage assets and their settings within the Site or its vicinity, and to assess factors which may have affected the survival or condition of any known or potential assets.</p>	<p>3.17 It should be noted that the assessments presented in this HTVIA report regarding the selected heritage receptors, do not include the Archaeological Desk-Based Assessment submitted as part of the ES submission by Greengage. The heritage receptors in this report included for assessment only consider above ground heritage (assets).</p>	<p>3.19 In producing the ES HTVIA it is important to distinguish the use of the term 'significance' in a heritage context, which is defined by the NPPF as the significance of the heritage asset in question, with the use of 'significance' in EIA terms, which primarily relates to the 'significance of environmental effect' as a result of change owing to the Proposed Development.</p>
<p>Effects on heritage receptors</p> <p><u>Aims, objectives and scope</u></p>	<p><u>Assessment methodology for heritage receptors</u></p> <p><u>Introduction and terminology</u></p>		<p>3.20 In the context of the Environmental Impact Assessment (EIA) the heritage asset is the receptor of change and the term 'significance' where referring to heritage is interchangeable with the term 'importance' and the 'sensitivity to change' of the receptor.</p>
<p>3.12 The purpose of this heritage assessment is to determine, as far as is reasonably possible from existing records, an understanding of the historic environment resource in order to:</p> <ol style="list-style-type: none"> i. Provide a heritage baseline assessment to understand the historical and background to the Site; ii. Formulate an assessment of the importance and sensitivity of the known or potential above ground heritage assets; considering their archaeological, historic, architectural/artistic interests and their setting; and 	<p>3.15 Local planning authorities require an applicant to provide an assessment of the significance of any above ground heritage assets affected by the Proposed Development, including any contribution made by their setting to this significance. This includes designated and non-designated heritage assets. The following terminology has been adopted within this assessment for classifying and discussing the historic environment:</p> <p>a) A 'heritage asset' is a building, monument, site, place, area or landscape identified as meriting consideration in planning decisions because of its heritage interest (NPPF, Annex 2 Glossary). In this HTVIA, those assets likely to be affected by the Proposed Development are referred to as 'heritage receptors';</p>		<p>3.21 Therefore, to avoid confusion, this assessment will utilise the term 'importance' in relation to the significance of the heritage asset (receptor) in question, while 'significance', will be associated with the 'significance of the environmental effect'.</p> <p>3.22 Evaluation of importance will be informed primarily by the designation of the assets at an international, national, regional or local level (such as listing) as well as their ability to contribute to an understanding of the past. Definitions of importance/sensitivity to change are set out in table 3.1.</p>

Table 3.1: Definitions of importance/sensitivity to change of heritage receptors.

Heritage importance/sensitivity to change	Criteria
Very High Of International Importance	<ul style="list-style-type: none"> World Heritage Sites and the individual attributes that convey their Outstanding Universal Value. Areas associated with intangible historic activities as evidenced by the register and areas with associations with particular innovations, scientific developments, movements or individuals of global importance.
High Of National Importance	<ul style="list-style-type: none"> Scheduled monuments. Listed buildings (Grade I, II*). Registered historic parks and gardens (Grade I, II*). Grade II listed buildings which can be shown to have exceptional qualities in their fabric or historic associations. Registered battlefields. Non-designated sites and monuments of schedulable quality and/or importance discovered through the course of assessment, evaluation or mitigation. Unlisted assets that can be shown to have exceptional qualities or historic association, and may be worthy of listing at Grade II* or above. Designated and undesignated historic landscapes of outstanding interest, or high quality and importance and of demonstrable national value. Well-preserved historic landscapes, exhibiting considerable coherence, time-depth or other critical factors.
Medium Of Regional Importance	<ul style="list-style-type: none"> Conservation areas. Grade II listed buildings. Grade II registered historic parks and gardens. Historic townscapes and landscapes with reasonable coherence, time-depth and other critical factor(s). Unlisted assets that can be shown to have exceptional qualities or historic association, and may be worthy of Grade II listing. Designated special historic landscapes. Undesignated historic landscapes that would justify special historic landscape designation, landscapes of regional value. Averagely well-preserved historic landscapes with reasonable coherence, time-depth or other critical factors. Archaeological features and deposits of regional importance.
Low Of Local Importance	<ul style="list-style-type: none"> Locally listed buildings. Sites of importance within a district level. Heritage assets with importance to local interest groups or that contributes to local research objectives. Robust undesignated assets compromised by poor preservation and/or poor contextual associations. Robust undesignated historic landscapes. Historic landscapes with importance to local interest groups. Historic landscapes whose value is limited by poor preservation and/or poor survival of contextual associations.
Negligible	<ul style="list-style-type: none"> Assets with little or no archaeological, architectural or historical interest.

Considering the setting of the heritage receptor

- 3.23 Historic England has issued Historic Environment Good Practice Advice in Planning guidance notes. The following of which are relevant to the Proposed Development: *Advice Note 2 – Managing Significance in Decision-Taking in the Historic Environment* (March 2015), as well as *Advice Note 3 (2nd Ed.) – The Setting of Heritage Assets* (December 2017).
- 3.24 The Historic England guidance advocates a systematic and staged approach to the assessment of the implications of development in terms of their effects on the settings of heritage assets. The steps are as follows (reformulated here in context of the EIA):
- Step 1** of the approach is 'identifying the heritage assets affected and their settings'. This initial step is carried out by undertaking documentary research as described previously under 'Baseline data collection';
 - Step 2** requires consideration of 'whether, how and to what degree these settings make a contribution to the importance of the heritage asset(s)'. The guidance states that this stage of the assessment should first address the key attributes of the heritage asset itself and then consider: i) the physical surroundings of the asset, including its relationship with other heritage assets; ii) the way the asset is appreciated; and iii) the asset's associations and patterns of use;
 - Step 3** involves 'Assessing the effect of the Proposed Development on the importance of the asset(s)'. This stage of the assessment addresses the key attributes of the Proposed Development, such as its: i) Location and siting; ii) Form and appearance; iii) Additional effects; and iv) Permanence; and
 - Step 4** of the guidance should explore opportunities for 'maximising enhancement and minimising harm', while Step 5 is to 'make and document the decision and monitor outcomes'. For the purposes of this assessment, Steps 1-4 of the process have been followed. Step 5 is the duty of the Local Planning Authority and therefore not undertaken as part of this assessment.
- 3.25 Historic England guidance on managing change within the settings of heritage assets gives advice on understanding setting in relation to importance (or sensitivity to change' in regards to this assessment), and how views may contribute

to setting. The advice note sets out a recommended approach (reformulated here in context of the EIA), including:

- Setting is the surroundings in which an asset is experienced and may therefore be more than its curtilage; that it may be affected by a range of factors beyond visual, including historical relationships between assets; it may extend beyond public rights of way;
- The extent of setting is not fixed and may change as the asset and its surroundings evolve; heritage assets within extensive townscapes or landscapes may have nested or overlapping settings;
- Where the setting of a heritage asset has been compromised, consideration needs to be given to whether additional change will further detract from, or can enhance the importance of the asset;
- Importance of setting in relation to designed townscapes or landscapes can extend beyond the designated area and may not necessarily be confined to land visible from the Site, but may have historic or other associations with the asset; and
- The contribution of views to setting can be assessed in relation to static, dynamic, long, short or laterally spreading views, and include a variety of views of, from, across or including that asset.

Determining the magnitude of change (impact of the Proposed Development)

- 3.26 Determination of 'magnitude of change' upon the importance of known or potential heritage assets is based on the severity of the likely impact (e.g. physical effects on built heritage assets or the permanent presence of new structures, etc., that result in changes to the contribution of setting to the heritage importance of a built heritage asset).
- 3.27 Table 3.2 describes the criteria used in this assessment to determine the magnitude of change.
- Significance of environmental effect
- 3.28 The significance of the resultant environmental effect is determined by combining the assigned sensitivity to change of the receptor (dictated by the importance of the heritage asset) with the predicted magnitude of change (impact) on that receptor:

Sensitivity to change (of the receptor) + magnitude of change (impact) = significance of effect

3.29 Table 3.3 illustrates how information on the sensitivity to change of the asset and the magnitude of change arising from the Proposed Development has been combined to arrive at an assessment of the significance of effect. The matrix is not intended to 'mechanise' judgment of the significance of effect, but to act as a check to ensure that judgments regarding heritage importance and the receptor's sensitivity to change and magnitude of change resulting from the Proposed Development arrive at a level of significance of the effect that is reasonable and balanced.

3.30 Where information is insufficient to be able to quantify either the receptor's sensitivity to change or the magnitude of change arising from the Proposed Development with any degree of certainty, the effect is given as 'uncertain'.

3.31 In terms of the assessment only the 'major' and 'moderate' effects will be considered 'significant', i.e. which may warrant mitigation, these are shaded in Table 3.3.

3.32 Once the significance of the effect has been established, the next step will be to assess the nature (or direction) of the effect, which can be 'beneficial', 'adverse' or 'neutral'. If the Proposed Development will enhance heritage values or the ability to appreciate them, as expressed in the first stage of the assessment, then the impact on heritage importance will be deemed to be positive, therefore the nature of the effect is attributed as 'beneficial'. However, if the development fails to preserve heritage values or impairs their appreciation by affecting the receptor's heritage importance negatively, then the nature of the effect will be deemed to be 'adverse'. In cases where the significance of the effect is considered to be very minor, negligible or uncertain, then it is generally impossible to identify the nature of the effect. In these cases the nature of the effect is attributed as 'neutral'.

3.33 The following terms have been used to define the significance of effects identified:

- **Major effect:** where the Proposed Development could be expected to have a considerable effect (either adverse or beneficial) on heritage receptors (assets). For the historic environment, if the effect is adverse in nature, this equates to 'substantial harm' to, or total loss of, importance (or significance in terms of the NPPF) of an asset of very high, high or medium heritage importance, as a result of changes to its physical form or setting.

- **Moderate effect:** where the Proposed Development could be expected to have a noticeable effect (either adverse or beneficial) on heritage assets (receptors). For the historic environment, if the effect is adverse in nature, this equates to 'less than substantial harm' (in NPPF terms) to the importance (or significance) of an asset of very high, high or medium heritage importance, as a result of changes to its physical form or setting.
- **Minor effect:** where the Proposed Development could be expected to result in a small, barely noticeable effect (either adverse or beneficial) on heritage assets (receptors). For the historic environment, if the effect is adverse in nature, this equates to a low degree of 'less than substantial harm' (in NPPF terms) to the importance of an asset of very high, high or medium heritage importance, as a result of changes to its physical form or setting, or 'substantial harm' to, or the loss of, importance of an asset of low heritage importance.
- **Negligible:** where very minor or no discernible effect is expected as a result of the Proposed Development on heritage receptors (assets), i.e. the effect is insignificant. In this case the nature of the effect is identified as neutral.

Effects on townscape and visual receptors

3.34 The methodology for the assessment of townscape and visual receptors is to some extent different to that of heritage receptors. This section first covers the baseline conditions and identification of receptors for townscape and visual amenity separately, followed by the assessment process for both.

Baseline conditions and receptors for townscape assessment

3.35 The GLVIA, at paragraph 2.7, defines townscape as: "... areas where the built environment is dominant. Villages, towns and cities often make important contributions as elements in wider-open landscapes, but townscape means the landscape within the built-up area, including the buildings, the relationship between them, the different types of urban open spaces, including green spaces and the relationship between buildings and open spaces."

Table 3.2: Magnitude of change on heritage receptors.

Magnitude of change	Description of change
Large	<ul style="list-style-type: none"> • Complete removal of asset; • Change to asset importance resulting in a fundamental change in our ability to understand and appreciate the resource and its historical context, character and setting; • The transformation of an asset's setting in a way that fundamentally compromises its ability to be understood or appreciated; and • The scale of change would be such that it could result in a designated asset being undesignated or having its level of designation lowered.
Medium	<ul style="list-style-type: none"> • Change to asset importance resulting in an appreciable change in our ability to understand and appreciate the asset and its historical context, character and setting; and • Notable alterations to the setting of an asset that affect our appreciation of it and its importance; or the unrecorded loss of archaeological interest.
Small	<ul style="list-style-type: none"> • Change to asset importance resulting in a small change in our ability to understand and appreciate the asset and its historical context, character and setting.
Negligible	<ul style="list-style-type: none"> • Negligible change or no material change to asset importance. No real change in our ability to understand and appreciate the asset and its historical context, character and setting.
Uncertain	<ul style="list-style-type: none"> • Level of survival / condition of resource in specific locations is not known: magnitude of change is therefore not known.
No Change	<ul style="list-style-type: none"> • No change.

Table 3.3: Significance of environmental effect matrix for heritage receptors.

		Sensitivity to change of the receptor (depending on its heritage significance, or importance)				
		Very High	High	Medium	Low	Negligible
Magnitude of change (impact of the development)	Large	Major	Major	Major or Moderate	Moderate or Minor	Minor or Negligible
	Medium	Major or Moderate	Major or Moderate	Major or Moderate	Minor	Minor or Negligible
	Small	Moderate or Minor	Moderate or Minor	Minor	Minor	Negligible
	Negligible	Minor or Negligible	Minor or Negligible	Negligible	Negligible	Negligible

<p>3.36 In order to get a full understanding of the Site, its existing condition and its role in the townscape in relation to national, regional and local policy and guidance, the Site and its townscape context were visited, studied, researched and photographed as set out in section 6.0. The information gathered represents the baseline conditions against which the assessments are made, based on Site visits conducted in 2021.</p>	<ul style="list-style-type: none"> • Particular features, such as skylines or permeability through the area, that are of importance; • The overall character or quality/condition of a particular street or series of spaces; and • Notable aesthetic, perceptual or experiential qualities. 	<p>exposure’ of the Proposed Development as well as its ‘maximum conjunction’ with sensitive elements in the built environment.</p>	<p>3.49 The assessment of visual effects are based on the comparison of a photograph of the ‘existing’ baseline condition with an AVR showing the ‘proposed’ condition, illustrating the completed Proposed Development as occupied in its operational phase. AVRs for the cumulative condition are not provided in this report, as the cumulative schemes were of a small scale or at a distance away from the Site (more than 1km) that it was deemed any visibility in combination would be unlikely and where possibly, would likely not be significant. Instead a narrative assessment of the cumulative condition will be included in relation to cumulative sites identified by LBRuT. It should be noted that photography was captured in winter months, allowing for maximum visibility towards the Site. It should also be noted that viewers (visual receptors) have peripheral sight, and their experience of a view is not limited by edges and frames, like the image of a view. The assessment tries to replicate the viewers’ actual experience and not just the image that is included in this assessment.</p>
<p>3.37 The purpose of the townscape assessment is to identify any significant effects as a result of the Proposed Development on the townscape as an environmental resource. This is achieved by considering how the Proposed Development will affect the key components of the townscape, its perceptual and aesthetic qualities and its distinctive character, in accordance with the GLVIA (2013).</p>	<p>3.41 Paragraph 2.20 of the GLVIA goes on to define visual amenity as <i>“When the interrelationship between people (‘human beings’ or ‘population’ in the language of the Directive and Regulations) and the landscape is considered, this introduces related but very different considerations, notably the views that people have and their visual amenity – meaning the overall pleasantness of the views they enjoy of their surroundings.”</i></p>	<p>3.45 The selected views are chosen in consultation with the local planning authority and take into consideration their existing guidance on the topic (if available). The agreed viewpoints generally represent a mix of close, medium and long distance views, where either the outline or the architectural design of the Proposed Development is likely to be visible.</p>	<p>3.50 All AVRs are either presented as fully rendered photorealistic photomontages or wirelines showing the external outline of the proposed development. The split between rendered and wireline views was agreed with LBRuT during the scoping process of the EIA. A further request my LBRuT in May 2022 led to the update of View 4 and View 10 from wireline to render in the Visual Impact section.</p>
<p><u>Baseline conditions of the townscape</u></p>	<p><u>Baseline conditions of visual amenity</u></p>	<p>3.46 The visual study area is centred around the Site and extends to approximately 500 meters for medium range views, and to 1.5 and 2.1 kilometers for long distance views (Views 15 and 16 respectively).</p>	<p><u>Assessment methodology for townscape and visual receptors</u></p>
<p>3.38 Establishing the baseline conditions for the townscape assessment includes identifying areas of distinct townscape character surrounding the Site, which are likely to be significantly affected by the Proposed Development (townscape study area). This is done through research and field survey, prior knowledge of the area, professional judgement, and using information available that may have already been produced by others, for example by the local planning authority. Where conservation areas are designated in proximity to the Site, their appraisals may also be relevant to understanding the key characteristics of the townscape.</p>	<p>3.42 The assessments of effects on visual amenity are focused on the likely effects of changes to townscape views on visual receptors, i.e. people experiencing the townscape in a visual manner through townscape views. Therefore, the baseline condition is the appearance of townscape views as existing at the time of writing the assessment.</p>	<p>3.47 The consultancy considered the analysis of a Zone of Theoretical Visibility (ZTV) as a tool to inform the selection of townscape views for assessment (shown in the Heritage and Townscape Note) and produced in Vu.City. The result of a ZTV is a computer generated map highlighting open areas (such as streets, parks and gardens) from where the Proposed Development would be visible and not obstructed by existing built form. Though this is a helpful tool to discard areas from where the Proposed Development would definitely not be visible, it is less accurate to ascertain areas from where it will be visible, as the data informing the analysis is not as accurate as reality and there may be visual obstructions such as fences, street signage and trees, reducing or hindering visibility of the Proposed Development. The potential limitations of using a ZTV analysis are noted in the GLVIA (3rd edition, 2013) and Historic England’s ‘Note 3: The Setting of Heritage Assets’ (second edition, 2017), although it is acknowledged that technological advancements have recently improved the accuracy of ZTV analysis, especially where LiDAR or similar data can be used to determine the exact form and location of obstructions.</p>	<p>3.51 As with the heritage assessment, the effects of the Proposed Development on townscape and visual receptors are assessed by combining judgements about the ‘sensitivity of the receptor’ and the ‘magnitude of change’ (impact) it would experience as a result of the Proposed Development to establish the significance of the environmental effect.</p>
<p>3.39 These townscape character areas are identified according to key characteristics and then mapped. Key characteristics may include natural features and topography, built form, urban grain, historic patterns, patterns of land use; scale, etc. Once identified, each townscape character area is then described according to its defining features and character and illustrated with photographs where appropriate.</p>	<p><u>Townscape views for visual assessment</u></p>	<p>3.48 The true accuracy of visual impact can only be proven, however, using fully verified Accurate Visual Representations (AVRs, also commonly known as ‘verified views’) created from the agreed viewpoints. AVRs are produced by incorporating a computer 3D model of the Proposed Development accurately into surveyed photographs of the local area, in accordance with Rockhunter’s (visualisation company) methodology (see Appendix 1) and as set out in the Greater London Authority’s London View Management Framework SPG.</p>	<p><u>Sensitivity of townscape receptors</u></p>
<p><u>Townscape receptors</u></p>	<p>3.43 Site visits, supported by map analysis and the use of computer models, and the study of other tall buildings within or around the Site (where relevant) allow for the identification of viewpoint locations from which the Proposed Development would potentially be visible. Although digital means can inform the process, the selection of views is only finalised once the Site has been visited.</p>	<p>3.52 Once townscape character areas are identified, their potential sensitivity is established by combining judgements about the value attached to their townscape and their susceptibility to change as a result of the Proposed Development. The value of the townscape receptor can be identified by a range of criteria such as condition, scenic quality, rarity, representativeness/recreational value, perceptual qualities and associations. The susceptibility to change is the ability of the townscape receptor to</p>	<p>3.52 Once townscape character areas are identified, their potential sensitivity is established by combining judgements about the value attached to their townscape and their susceptibility to change as a result of the Proposed Development. The value of the townscape receptor can be identified by a range of criteria such as condition, scenic quality, rarity, representativeness/recreational value, perceptual qualities and associations. The susceptibility to change is the ability of the townscape receptor to</p>
<p>3.40 Townscape receptors are the key characteristics of the townscape character areas that are likely to be affected by the Proposed Development. Examples of townscape receptors might be, amongst others:</p> <ul style="list-style-type: none"> • A particular scale or height of development that is characteristic and of value; • Particular spatial layouts, patterns of development or urban grain; • Particular relationships between open or green spaces, water bodies or topography; 	<p>3.44 Considerations for selected views include, amongst other factors: the likely maximum visibility of the Proposed Development; the likely ‘visual receptors’ that may experience the views from a certain location; winter and summer-time tree cover (where relevant); hierarchy of viewpoint (e.g. public or semi-public access, where relevant); the heritage importance of the viewing location or viewed place; the position of traffic signs or other visual obstructions; and the ability for surveyors to safely place equipment without causing obstructions. Views are generally restricted to street level (i.e. 1.6 metres above ground) in publicly accessible locations, as this is from where townscapes are most commonly appreciated. Each viewpoint and view from it aims to represent the ‘maximum</p>		

<p>accommodate the Proposed Development without detriment to the value of its character. For the purpose of the assessment, the sensitivity of townscape receptors is described as 'high', 'medium', 'low' or 'negligible', or at an intermediate level between these sensitivities (e.g. 'low to medium').</p>	<p>or 'negligible', or at an intermediate level between these sensitivities (e.g. 'low to medium').</p>	<p>i. Existing view: a description of the existing condition, describing its townscape qualities and visual amenity observed;</p>	<p>effects are considered significant environmental effects in EIA terms.</p>
<p><u>Sensitivity of visual receptors (people)</u></p>	<p><u>Magnitude of change for townscape and visual impact</u></p>	<p>ii. Sensitivity to change: consideration of the townscape value of the existing view, the receptors likely to experience it and their susceptibility to change in the visual amenity;</p>	<p>3.63 'Major', 'moderate' and 'minor' effects are self-explanatory as a result of combining the sensitivity to change and the magnitude of change as identified in table 3.4. 'Negligible' or 'no change' effects can arise where it is not possible to identify any effects on receptors owing to the Proposed Development. This may occur when receptors are located at a considerable distance from the Proposed Development, such that it would have only a minimal effect or it would not be visible owing to obscuration by surrounding buildings or vegetation.</p>
<p>3.53 The sensitivity of visual receptors is considered by combining judgements of the value attached to a particular view and the receptor's susceptibility to change in the view. While it is acknowledged that different people may have different responses to the visual stimuli of the townscape, based on their own aesthetic preferences and circumstances (e.g. a local resident could react differently to a view than a tourist), the visual assessment takes this into account by including a spread of views to cover a wide range of receptors. Some of the viewpoints will be from important thoroughfares or public parks, while some will be from local residential streets.</p>	<p>3.56 The magnitude of change for both townscape and visual impact assessment is generally considered to be a combination of (i) the size and scale of the potential impact; (ii) the geographical extent of the area affected; and (iii) the duration of the impact of the Proposed Development in operation and its reversibility. These are quantitative factors which can generally be measured with some certainty. The assessment takes all these factors into account. In considering new development in urban contexts, the duration of the impact is generally considered to be permanent and non-reversible.</p>	<p>iii. Proposed view: a description of the Proposed Development's appearance in the view, its design quality and mitigation achieved through the design process;</p>	<p>3.64 In exceptional cases the assessment may describe effects which are not in accordance with table 3.4. Where such exceptional professional judgements are made, they are explained in the assessment text.</p>
<p>3.54 When heritage assets or their settings are visible in views, this will also inform the sensitivity of the receptor, as supported by Historic England's (HE) publications, including 'Seeing the History in the View' (2011) and 'Historic Environment Good Practice Advice in Planning, Note 3: The Setting of Heritage Assets' (second edition, 2017). The former includes 'Table 1: Value/Importance of individual heritage assets identified within the view', which identifies those heritage assets of high importance/value to "normally be a World Heritage Site, grade I or II* listed building, scheduled monument, grade I or II* historic park and garden or historic battlefield which is a central focus of the view and whose significance is well represented in the view"; whereas heritage assets of medium importance/value are identified to "normally be a grade II listed building, grade II historic park and garden, conservation area, locally listed building or other locally identified heritage resource which is a central focus of the view and whose significance is well represented in the view"; and heritage assets of low importance/value "may be a grade II listed building, grade II historic park and garden, conservation area, locally listed building or other locally identified heritage resource which does not form a main focus of the view but whose significance is still well represented in the view".</p>	<p>3.57 The magnitude of change in relation to visual receptors, in particular, is established by visually assessing wireline (outline) and/or rendered (photorealistic) AVRs illustrating the scale and visibility of the Proposed Development in the views, where the magnitude of change is a quantitative, objective measure of the impact of the Proposed Development as shown in each view.</p>	<p>iv. Magnitude of change: a quantitative assessment of the magnitude of change in the view as a result of the Proposed Development;</p>	<p><u>Establishing the qualitative nature (or direction) of effects</u></p>
<p>3.55 For the purpose of the assessment, the sensitivity of visual receptors is described as 'high', 'medium', 'low'</p>	<p>3.58 For the purpose of the assessment, both for townscape and visual amenity, the magnitude of change is described as 'large', 'medium', 'small' or 'negligible', or at an intermediate level between these sensitivities (e.g. 'low to medium').</p>	<p>v. Residual effect: the result of combining the sensitivity of the view and the magnitude of change to establish the significance of the environmental effect, and an assessment of the qualitative aspects (beneficial, adverse or neutral) of the Proposed Development to determine the likely nature or direction of the effect after mitigation measured have been incorporated through design; and</p>	<p>3.65 Once the significance of the effect has been established and mitigation and enhancement through design are considered, the qualitative nature (or direction) of the overall, or residual, effect is defined as 'beneficial', 'neutral or balanced' or 'adverse'.</p>
	<p><u>Structure of the assessment process</u></p>	<p>vi. Cumulative effect: where relevant, an assessment is made of the potential cumulative visual effects arising from the combined visibility in the view of the Proposed Development with other schemes (usually limited to those consented and/or under construction), also highlighting the contribution of the Proposed Development to the overall cumulative environmental effect.</p>	<p>3.66 'Beneficial' townscape and visual effects occur when the Proposed Development would give rise to an improvement in townscape or view quality and the visual amenity of the viewer owing to:</p>
	<p>3.59 The assessment of townscape and visual effects are structured in a stepped approach. For townscape assessments, once the receptors are identified the consultancy will establish their sensitivity to change and the magnitude of change resulting from the Proposed Development. The following step involves an assessment of the residual effect, once mitigation through design is considered, including the qualitative aspect of the effect (i.e. its nature or direction). The final step involves an assessment of the cumulative effect, when considering the effect of the Proposed Development in combination with other relevant schemes. The approach to cumulative assessment is to focus on the additional effects of the Proposed Development on top of the cumulative baseline.</p>	<p><u>Establishing the significance of effects</u></p>	<ul style="list-style-type: none"> • An enhancement of the townscape quality; • An enhancement or reinforcement of the key characteristics of the townscape character areas; and/or • The introduction of features or elements of high design quality, which enhance the existing character and visual amenity.
	<p>3.60 Each visual assessment is structured as follows:</p>	<p>3.61 As is also the case for heritage assessments, the significance of townscape and visual effects is established by combining assessments of the sensitivity of the receptors and the magnitude of the change resulting from the Proposed Development.</p>	<p>3.67 'Neutral or balanced' townscape and visual effects can occur when:</p>
		<p>Sensitivity to change (of the receptor) + magnitude of change (impact) = significance of effect</p>	<ul style="list-style-type: none"> • Beneficial and adverse effects are finely balanced; or • Some detailed high quality design aspects of the Proposed Development are not discernible, for example when views are too distant, but other qualitative aspects, such as the overall massing of a building, can still be appreciated. In this case, the consultancy does not have enough information to establish a beneficial or adverse nature of the effect;
		<p>3.62 Thereafter, the mitigation and/or enhancement achieved through design is considered, giving rise to a residual, or overall effect. The significance of townscape and visual effects is rated on a scale of 'major', 'moderate', 'minor', or 'negligible' or 'no change', or at an intermediate level, as illustrated in table 3.4, where only major and moderate</p>	

Table 3.4: Significance of environmental effect matrix for townscape and visual receptors.

		Sensitivity to change of the receptor (for townscape and visual receptors)			
		High	Medium	Low	Negligible
Magnitude of change (impact of the development)	Large	Major	Major or Moderate	Moderate or Minor	Minor or negligible
	Medium	Major or Moderate	Moderate	Minor	Minor or negligible
	Small	Moderate or Minor	Minor	Minor	Negligible
	Negligible	Minor or negligible	Minor or Negligible	Negligible	Negligible or No Change

or

- Where the effect is so minor or negligible that the quality is not discernible.

3.68 'Adverse' townscape and visual effects can occur when the Proposed Development would give rise to deterioration in the quality of the townscape or visual amenity owing to:

- Detriment to the key characteristics of townscape character areas that would affect their value negatively; and/or
- The introduction of features or elements of poor design quality that would detract from the existing character and negatively affect visual amenity.

Residual effects on townscape and visual receptors

3.69 After establishing both the quantitative and qualitative aspects of the assessment, the townscape and visual effects are given a rating which refers to both, the significance of the potential effect and whether it is beneficial, neutral or balanced, or adverse, after mitigation and/or enhancement through design have been taken into account. These effects are referred to as 'residual' effects,

which can be: '**major and beneficial**'; '**moderate and beneficial**'; '**minor and beneficial**'; '**major and neutral/balanced**'; '**moderate and neutral/balanced**'; '**minor and neutral/balanced**'; '**major and adverse**'; '**moderate and adverse**'; '**minor and adverse**'; '**negligible**'; '**no change**', or at an intermediate level between these ratings (e.g. 'minor to moderate, and beneficial').

3.70 In this HTVIA, a proportionate approach is taken to carry out the assessment of effects. Those receptors most likely to be affected by the Proposed Development (e.g. those in closer proximity to the Site, or most exposed to it owing to the topography or townscape of the area) are assessed in more detail, while other receptors less likely to be affected, or those which share a setting and are therefore likely to have similar effects, are assessed in a more proportionate way or in groups, based upon a judgement of likely levels of significance and effects.

3.71 In accordance with Historic England's recommendations in Note 3: The Setting of Heritage Assets (2017), the assessment commentary that accompanies the 'proposed' and 'cumulative' views is intended to provide '*a clearly expressed and non-technical narrative argument that sets out 'what matters and why' in terms of heritage significance and the setting of assets affected, together with the effects of the development upon them*'. The reader is therefore encouraged to appreciate the assessments in the context of the narrative text about each view. The effects found should not be translated into scoring systems or statistics.

Cumulative effects on heritage, townscape and visual receptors

3.72 In addition to an assessment of the heritage, townscape and visual effects of the Proposed Development in isolation, this HTVIA also considers the effects of the Proposed Development when assessed in combination with other committed developments in the vicinity that may have a combined or 'cumulative' effect on receptors. These are generally schemes that have been either consented by the relevant planning authority or are under construction, but in some exceptional cases they can include indicative schemes which are not yet consented but likely to come forward. In this instance they include cumulative sites, so the cumulative assessment is conducted in a high level assessment. The list of cumulative development has been agreed with LBRuT.

3.73 The assessment of cumulative effects refer to contribution or additional effects of the Proposed Development to the cumulative baseline. In cases where the Proposed Development has an effect when considered in isolation, but does not act cumulatively with other schemes, the significance rating will be indicated as '**no cumulative effect**'.

3.74 The cumulative schemes considered are as the following list:

1. 1-1C King Street, 2-4 Water Lane, The Embankment and River Wall, Water Lane, Wharf Lane and The Diamond Jubilee Gardens, Twickenham; Planning Reference: 21/2758/FUL, Pending Determination, approximate distance to Ham Close: 1.23 kilometres;
2. St Johns and Amyand House Strafford Road, Twickenham; Planning Reference: 18/4266/FUL, Granted 15/05/2019, approximate distance to Ham Close: 1.42 kilometres;
3. Old Station Forecourt Railway Approach, Twickenham; Planning Reference: 19/3616/FUL, Granted 03/03/2021, approximate distance to Ham Close: 1.58 kilometres;
4. Land at Junction of A316 and Langhorn Drive and Richmond College Site (Including Craneford Way East Playing Fields And Marsh Farm Lane) Egerton Road Twickenham; Planning Reference: 15/3038/OUT, 19/2517/RES, Approved 16/08/2016, approximate distance to Ham Close: 2.50 kilometres;

5. Ryde House 391Richmond Road, Twickenham; Planning Reference: 16/2777/FUL, Granted 21/09/2017, approximate distance to Ham Close: 2.07 kilometres;
6. Lockcorp House, 75 Norcutt Road, Twickenham; Planning Reference: 17/1033/FUL, Appeal Allowed 23/05/2018, approximate distance to Ham Close: 2 kilometres;
7. SA 17 St Michaels Convent, 56 Ham Common, Ham Richmond; Planning Reference: 16/3553/LBC, Granted 24/04/2018, approximate distance to Ham Close: 671.69 metres;
8. SA 16 Cassel Hospital, Ham Common, Ham; Planning Reference: No Planning Application submitted, approximate distance to Ham Close: 784.76 meters;
9. SA 8 St Mary's University, Strawberry Hill; Planning Reference: No Planning Application submitted, approximate distance to Ham Close: 1.28 kilometres;
10. SA 5 Telephone Exchange, Teddington; Planning Reference: No Planning Application submitted, approximate distance to Ham Close: 1.52 kilometres;
11. SA6 Teddington Delivery Office, Teddington; Planning Reference: No Planning Application submitted, approximate distance to Ham Close: 1.37 kilometres;
12. SA 7 Strathmore Centre, Strathmore Road, Teddington; Planning Reference: 20/0539/FUL, Pending Determination, approximate distance to Ham Close: 2.05 kilometres.

3.75 Due to the height of the Proposed Development primarily rising to a similar height as that of some of the taller existing blocks on the Site and the prevailing tree line in the immediate and wider area, it is unlikely that the Proposed Development will be experienced at the same time as any of these cumulative sites, other than in the cases of Views 15 and 16, which provide wider panoramas. The cumulative assessment regarding views will be discussed in section 8.0.

Effects during demolition and construction

3.76 Effects arising during the demolition and construction phases are usually temporary, short-term and reversible. The methodology used for assessing the effects during demolition and construction is the same as that set out above for the Proposed Development in operation, save for the fact that no AVRs are used to depict the demolition and construction phases and professional judgement is used instead to assess the likely effects. The assessments of

effects on heritage, townscape and visual receptors likely to arise during demolition and construction are presented in section 8.0.

Climate change and adaptation

- 3.77 Changes expected from climate change, such as increased rainfall levels and temperatures, are unlikely to impact on the appearance of the operational Proposed Development in townscape views, the overall character of the townscape, or its relationship with heritage assets.

Authorship

- 3.78 This HTVIA has been prepared by Savills Heritage and Townscape, a multidisciplinary consultancy with expertise in the areas of built heritage, townscape and archaeology. The consultants are employed by the applicant to provide independent and un-biased professional advice to the design team and then consider any beneficial or adverse aspects of the Proposed Development based on best practice guidance in a balanced and transparent manner. Any qualitative aspects of the assessments that can be considered to a certain extent to be subjective are based on informed professional judgment based on the authors' experience. All consultants are highly qualified and trained professionals in the areas of planning, architecture, urban design, and the historic environment.
- 3.79 The type of photography used for AVRs and the accuracy in the depiction of the Proposed Development in photomontages are responsibility of the visualisation professionals. Their methodology statement is presented at Appendix 1.

4. Assumptions and Limitations

4.1 The assessment methodology in section 3.0 is affected by some assumptions and limitations:

- i. This report is compiled using primary and secondary information derived from a variety of sources, only some of which have been directly examined. The assumption is made that this data, as well as that derived from other secondary sources, is reasonably accurate;
- ii. The visual assessment does not cover every possible view of the Proposed Development, but were selected using professional judgement of where there are particular instances of townscape or visual sensitivity;
- iii. Throughout the views' selection process the consultants have referred to local policy in relation to important and/or protected views in LBRuT. Emerging policy frameworks / guidance on views may be adopted during or after the development of the HTVIA and may inform the views selection down the line, depending on timings of adoption and the submission of the ES;
- iv. The photorealistic rendered AVRs are a useful tool for assessment, but there is a degree of professional judgment made by the visualisation specialists in the artistic representation of materials and the effects of weather conditions, daylight and distance. The wireline AVRs just show the outline of the proposed development in the view and are therefore a simplified version of what will be visible. The assessment of these views requires the consultants to extrapolate from other design information to define the qualitative component of the effects;
- v. Assumptions have been made in this HTVIA about the susceptibility of people to visual changes in the townscape, as well as on the types of people likely to experience particular views. These assumptions are based on professional judgment but are limited as the responses of individuals are varied and cannot all be covered in the assessment.
- vi. The photography was carried out in January and February 2022, when the trees were not in leaf, allowing for maximum visibility towards the Site.

5. Historic Background

- 5.1 The site and its immediate surrounding area are well known for holding evidence of prehistoric activity and there have been a large number of archaeological investigations revealing evidence to support this. The southern portion of England in the prehistoric period was inhabited by hunter-gatherer nomadic people groups and their presence was confirmed by the discovery of large numbers of worked flints deposited during the Palaeolithic and Mesolithic periods; overall suggesting that the surrounding land was used as a hunting ground or perhaps for forest clearance. In addition worked flints tend to indicate more permanent settlement. Other archaeological finds included, but were not limited to, an arrowhead, as well as a number of scrapers. The largest areas of local pre-historic activity were focused to the north and west of the site location, however the closest was located along Mowbray Road to the south.
- 5.2 There is archaeological evidence to suggest that the surrounding land was continually used during the Bronze Age, at least as a hunting ground or burial site. This was evidenced by the discovery of an urn and a number of arrowheads to the south west of present day Ham Close in Broughton Avenue. However there is no evidence to indicate any Iron Age activity within, or immediately surrounding the site. During the Iron Age sections of present day Greater London and the wider area would have fallen within the boundaries of the Catuvellauni tribe, whose administrative centre was located within St. Albans. Prior to the Roman invasion the Catuvellauni were the most powerful Iron Age tribe within south eastern England.
- 5.3 London was formally established as Londinium by the Romans in the middle of the first century. The growth of the city was initially hindered during the Boudican revolt that shortly followed its establishment, taking place between 60-61 AD when much of the contemporary city was burned. However, London had grown to a substantial size by the fourth century when it became one of the four key provincial capitals of Roman Britain. Contained within a set of fortified walls were a large basilica, forum and Amphitheatre surrounded by a large number of civic and vernacular buildings. Within the context of ancient

London, the site was located some distance to the west of the Roman city and would have chiefly been accessed by the Thames which passes it closely to the west, as such it is not located in close proximity to any of the Roman road networks which exit London in this direction. In addition, to date no evidence has been found indicating Romano-British activity within the area of the site.

- 5.4 Both Ham and Petersham developed to the north-east of the current site location as village settlements principally during the Early Medieval period, with the names of both places rooted in Old English etymology. The name, or prefix in relation to Petersham, refers to a home, settlement or farmstead often named after the owner. While no remains of any of the built environment dating to this period have been uncovered, the Saxon settlement would likely have consisted of a modest sized farm, with two to three main buildings, likely to have been enclosed by ditches.
- 5.5 Interestingly Ham is not mentioned within the Domesday Survey commissioned by William I in the late eleventh century. Although, it is possible, owing to its proximity, that it was simply recorded alongside Petersham or alternatively the settlement may have been temporarily abandoned or disused. Petersham was noted within the Domesday Survey as being under the ownership of the Abbey of St. Peter and had a recorded total of seventeen households in 1086. Within the context of Late Medieval England this would have been a settlement of middling size. The recorded history of the area between 1100 and 1500 is relatively poor, as such it is likely that both settlements remained largely static in size prior to their later development during the following centuries. However, as was characteristic of Medieval settlements, it is known that Ham was a manorial holding and is noted several times in records dating to the fourteenth century. In addition, it was two hundred years earlier during the twelfth century that Ham was mentioned as an individual settlement, when it was noted as 'Hamma' as a member of Kingston within the royal demesne. At this time the village is noted as making a forty three shilling contribution toward the marriage of Matilda, daughter of King Richard I.

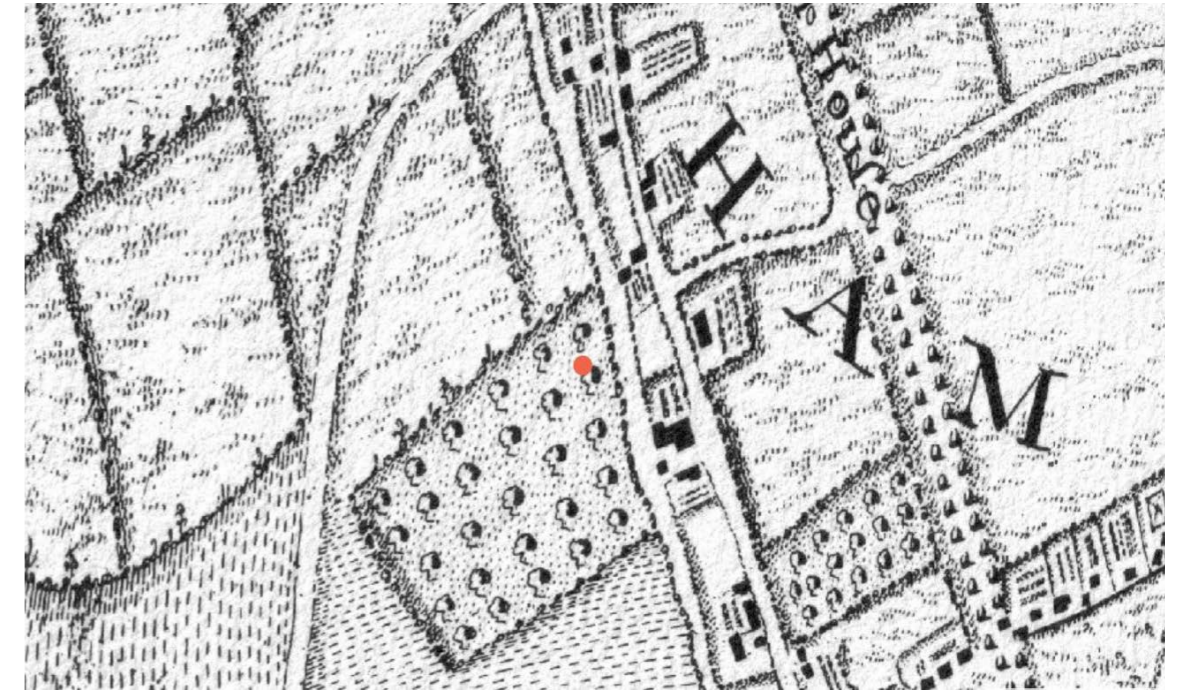


Figure 5.1: John Rocque's '10 Mile Round' map of 1746 with approximate site location shown in red. [Source: Layers of London]



Figure 5.2: Late 17th century painting of Ham House, attributed to Henry Danckerts. [Source: Collage, London Picture Archive]



Figure 5.3: Ham Common, late 19th century. [Source: Ham is where the Heart is]

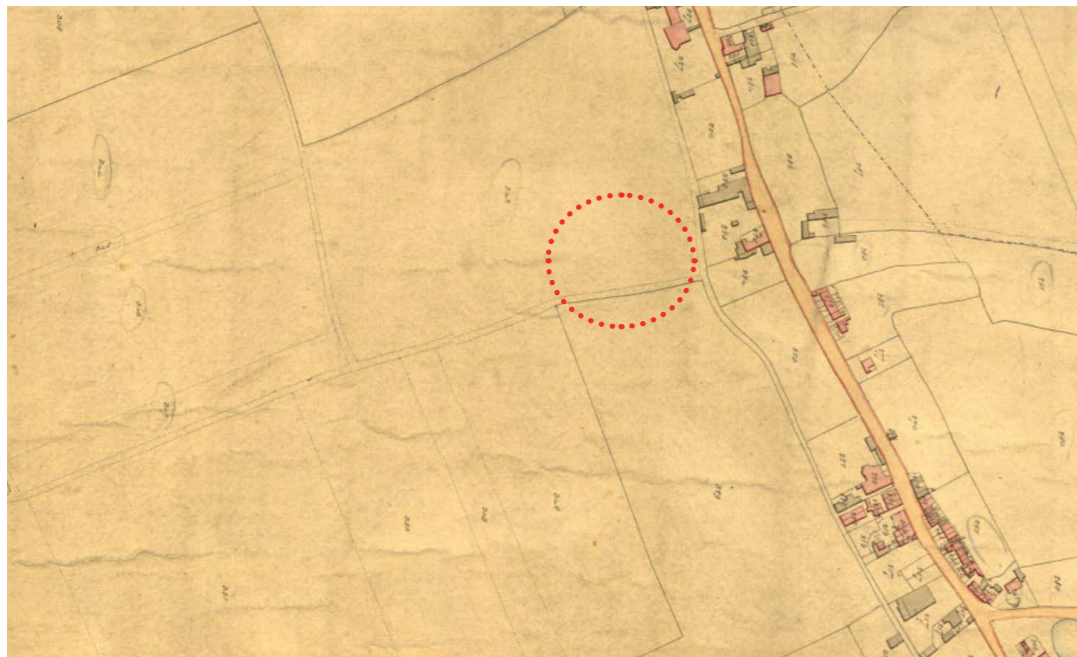


Figure 5.4: Tithe Map of 1841 showing the site and surroundings, not to scale. The approximate location of the site is outlined in red. [Source: The Genealogist, Parish Tithe Maps]

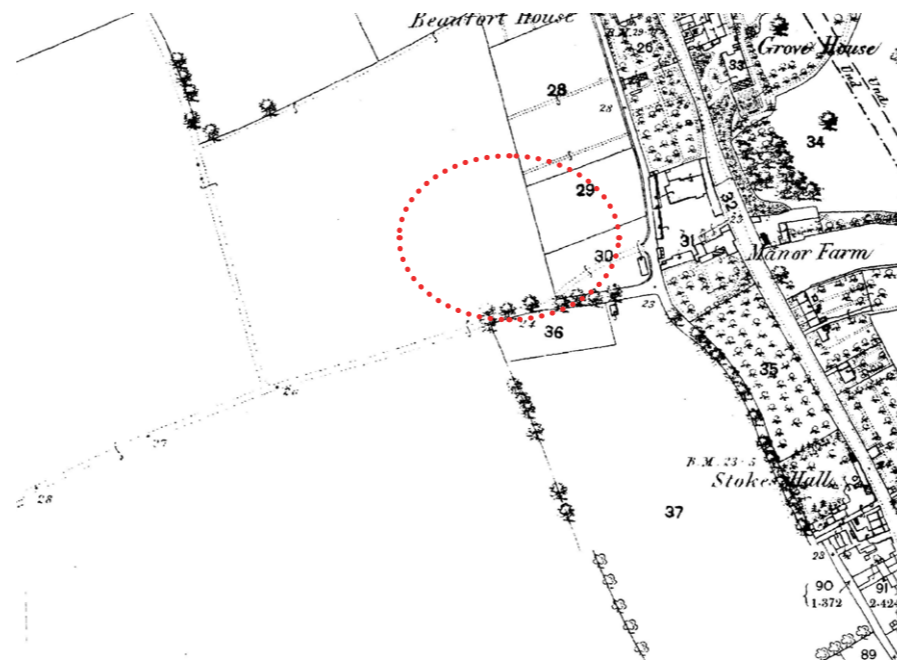


Figure 5.5: Ordnance Survey mapping (1860) illustrating site and surrounding, not to scale. The approximate location of the site is outlined in red. [Source: National Library of Scotland]

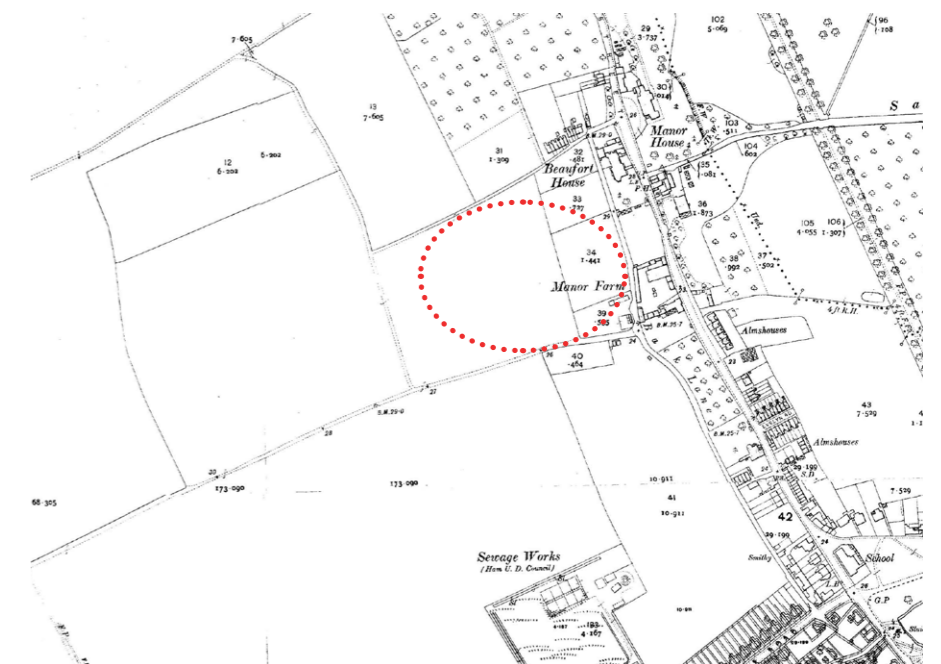


Figure 5.6: 1910 Ordnance Survey mapping, not to scale. The approximate location of the site is outlined in red. [Source: National Library of Scotland]

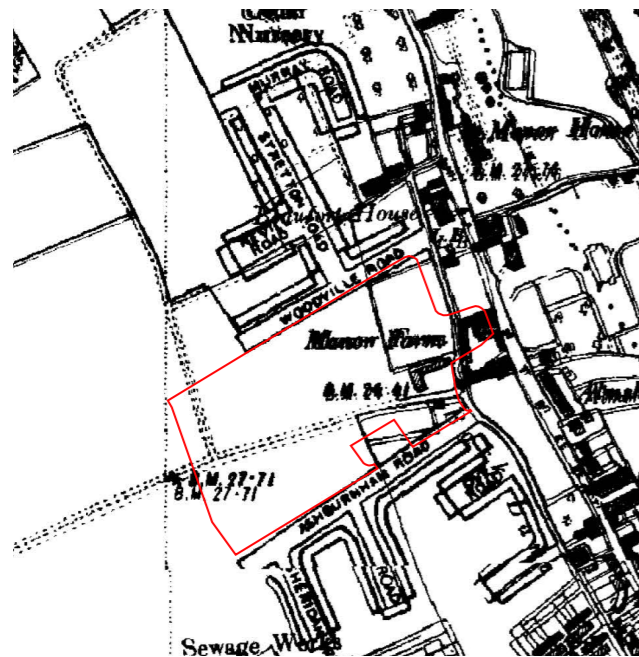


Figure 5.7: 1930 Ordnance Survey mapping, not to scale. The approximate location of the site is outlined in red. [Source: National Library of Scotland]



Figure 5.8: 1960 Ordnance Survey mapping, not to scale. The approximate location of the site is outlined in red. [Source: National Library of Scotland]



Figure 5.9: 1970 Ordnance Survey mapping, not to scale. The approximate location of the site is outlined in red. [Source: National Library of Scotland]

- 5.6 This area of Richmond developed significantly during the seventeenth century, best embodied in the construction of Ham House in 1610 for Thomas Vavasour, which would later become a popular meeting place for the ministers of Charles II. The house was constructed in the Jacobean style indicative of the popular architectural styles of the time, with the mullioned windows and ground floor arcade some of the best examples of this.
- 5.7 Although there were clearly well established settlements, the construction of Ham House arguably acted as a catalyst for the continued development of the wider area, with much of Petersham and Ham now retaining a number of seventeenth century cottages, one notable example being Avenue Cottage. The presence of additional buildings on Ham Common was confirmed by a survey in 1610. The popularity of the area as a retreat from London became greater during the early-mid eighteenth century when a number of large mansions were constructed throughout Ham, with Hardwick House and Beaufort House two standout examples of this.
- 5.8 Petersham is noted on cartographical sources dating to the seventeenth century, specifically the Blau map of 1646. However, one of the earliest and more illustrative cartographical sources relating to the site and its surroundings area is the John Rocque map of 1746 that illustrated London and its surroundings in a ten mile radius. This map depicts Petersham and Ham as two relatively distinct settlements of modest size, with the latter characterised to the north by the grounds and ornamental gardens of Ham House. The Rocque map illustrates the site as a section of orchard space, surrounded to the north, west and south by enclosed sections of arable land. To the west is situated a lane running parallel to present day Ham Street. A number of small detached buildings can be seen lining this road, likely to have served as both inhabited and uninhabited outbuildings, with the latter for agricultural storage (Figure 5.1). Ham House is depicted at this time upon a late seventeenth century painting, the perspective oriented to capture the building from the Avenue (Figure 5.2).
- 5.9 As evident on the tithe map of 1841, the site location constituted enclosed field space labelled as plots 343; and 348-350. The registered landowners were the representatives of Earl Lionel Dysart and the fields directly occupying the site location were overseen by William Hatch and Daniel Light. The context of the built environment at Ham / Ham Common at this time is also more clearly detailed on the tithe map, with the previously discussed settlement aligned with the common having grown in size, evidenced by the presence of a number of inhabited and uninhabited buildings. Further built development focused to the north along present day Ham Street. The largely rural settlement is captured on late nineteenth century photography (Figure 5.3).
- 5.10 The 'footprints' and layout of these buildings, namely small farm cottages, larger detached houses as well as uninhabited and habited outbuildings are indicative of the relatively rural land composition during this time (Figure 5.4). Between 1838 and 1848, a vegetarian group known as The Concordium established themselves at Alcott House in Ham Common and were followers of James Pierrepont Greaves. Alcott House was used by the group as a local school and community for a number of years with the aim of putting Greaves' ideas into effect.
- 5.11 By the late nineteenth century Ham had undergone a relatively significant amount of civic development, specifically manifesting in the construction of a number of almshouses, schools and terraced buildings. As with many of the future outer London boroughs, another example being Hillingdon, this section of Richmond retained a largely rural appearance during the late nineteenth century, by comparison with sections of inner London.
- 5.12 The geographical separation of Ham from the surrounding area to the west by the river also appears to have slowed built development to a certain extent, with Teddington, Twickenham and Richmond by this time substantially larger than Ham and Petersham. The approximate site location at this time was known as Ham Fields and remained as enclosed arable land, bisected by a footpath which led down to the river. To the immediate west of the site, a number of draw wells and farm buildings were interspersed across Ham Fields before the river bank. Directly to the east of the site a large group of agricultural buildings known as Manor Farm were located prior to the commencement of the footpath (Figure 5.5).
- 5.13 By 1890, the context of the built environment at the site had changed little, with the exception of a small terraced housing development directly to the south known as Gordon Hall (Figure 5.6). This group of buildings would be developed on a piecemeal basis over the following years, having visibly grown in size by 1910 with an accompanying sewage works constructed between Gordon Hall and the future location of the site.
- 5.14 Alongside Gordon Hall, which had again grown by 1930 to the north and west, the sewage works was also expanded, with a sand and ballast works built adjacent to this (Figure 5.7). The former was associated with the Ham River Grit Company, with the production of sand and ballast having been a local industry since 1904, following the Earl of Lysart leasing a proportion of the surrounding farmland to accommodate this (Figure 5.10). The company would then come to be owned by George and William Brice, a clay and barge operators.
- 5.15 During the early twentieth century a dock was constructed to allow the barges access into the flooded gravel pits and a narrow gauge railway was laid out. This land and the area surrounding it would later come to be designated as Metropolitan Open Land after 1952, as part of the residential transformation of the wider area. Development during this period generally used Ham Common as a focal point, with the new buildings forming a backdrop to the common. There was significantly less built development lining Ham Road which was still principally occupied by the aforementioned eighteenth century mansions.
- 5.16 By 1960 the context of the built environment, both at the site and within the surrounding area, was radically different. During the 1950s Manor Farm and its associated buildings had been entirely removed and a large proportion of the previous arable field space had undergone residential development in the form of Ham Close and a number of surrounding cul-de-sacs to the north and south.
- 5.17 Ham Close constituted a central green with a total of 113 post war pre-fabricated detached houses (Figure 5.8). As can be heard through the surviving digitised audio testimonies of local residents, these houses were highly popular, considered, owing to the road width, which did not easily accommodate motor vehicles, to be safe spaces for local children. The estate was intersected with numerous paths as well as roads that provided access to the common and Ham Road. The houses themselves were single storey in height and were built to last fifty years, but were pulled down to accommodate the existing Ham Close Estate. Concurrently, the other large scale development, comprised the Wates Estate. After planning permission was obtained in 1960, the Wates Estate was built to the north-west of Ham Close between 1962 and 1967. These were built upon a number of the former gravel pits, originally intended to provide a total of 700 residential units. Although subject to a certainly level of variety, these houses were constructed utilising red brick and/or cladding. The majority of the Wates Estate survives today, bordered to the west by Riverside Drive.
- 5.18 To the east the Ham Grey Court Secondary School had been constructed to cater to the students of the newly built estate in 1956. By this time Petersham and Ham had been effectively bridged by large numbers of newly constructed terraces with both, despite their absorption into the expanding urban environment, retaining their historic-architectural footprints. Within the wider area during the twentieth century, one notable addition was the Thames Young Mariners Base which operated on the site of the old gravel works. A shooting range was also established to the north.
- 5.19 In relation to its surroundings, the majority of which were retained, the Ham Close pre-fabricated estate was relatively short lived and by 1970 had been entirely replaced with the apartment buildings seen today and a newly constructed infants school adjacent to the west. By comparison with late twentieth century Ordnance Survey mapping the estate seen in 1970 is largely identical to that seen today with a number of blocks flanking a central hall, lined with open green space to the east. The static nature of built development after 1970 was also more generalised, with much of the area surrounding the site having changed little in appearance after this time (Figure 5.9). Today Ham retains a relatively distinct appearance by comparison with many of the London outer boroughs. The area is still well defined by its original green spaces and the physical barrier provided by the Thames to the west.



Figure 5.10: The Ham River Grit Company, Richmond Upon Thames, 1927. The approximate location of the site is outlined in red. Source: <https://www.britainfromabove.org.uk/en/image/EPW017371>.

6. The Site and Surrounding (baseline condition)

Introduction

- 6.1 This section presents a full description of the Site and its baseline condition; including townscape character areas and heritage assets. The study area presented here is within 500m radius from the Site boundaries. The information gathered presents the baseline conditions against which the heritage, townscape and visual assessments are made, following the methodology presented in section 3.0 of this report.

The Site's baseline condition

- 6.2 The Site is located within the London Borough of Richmond upon Thames, within the area of Ham. The Site boundary is defined to the east by Ham Street, to the south by Ashburnham Road, to the west by the aforementioned sport grounds and to the north by Woodville Road (see figure 6.1). It is not within any conservation area, the closest conservation area to the Site is Ham House Conservation Area to the east (about 200m away from the centre of the Site). Ham Village Green, which forms part of the Site, is identified as other open land of townscape importance within LBRuT's local policies. Outside of the Site boundary, to the west, occupying the sport grounds of St Richards CE primary school, there is another identified area of important townscape.
- 6.3 The Site currently comprises a total of 16 buildings, including the existing building of Ham Youth Club, nine stand-alone blocks of five storeys, three deck access flats featuring four storeys, two 'T' shaped blocks of three storeys, and built garages, as well as a number of surface car parking and semi-formal green spaces and lawns in between the blocks. The existing buildings on the Site provide 192 homes. All the buildings appear to date to the

1970s and are of no architectural merit. They have flat roofs and their facades consist of white cladding, white window frames and surrounds, as well as partial brick and painted cement elevations. The buildings are designed and oriented in a disparate layout, for instance the five storey blocks are oriented at 45 degrees to the street line. The buildings don't face the street, creating a leaky frontage to Ashburnham and Woodville Road, with minimal activity along the street. There is an existing winding road running through the centre of the Site that connects Ashburnham Road to Woodville Road, with the rest of the semi-formal/informal landscape of the Site located around the buildings. As a result of surface parking and the disparate layout of the buildings, the Site is less permeable with poor legibility and a poor sense of place. There is no provision for private residential amenity, as all the landscaped areas are not secured and are therefore accessible by the public. Both the townscape and architectural qualities of the Site and the existing buildings are poor and would benefit from redevelopment of a better standard (see figures 6.2 - 6.11).



Figure 6.1: Aerial view of the Site and its immediate context. The approximate Site boundary is identified in red.



Figure 6.2: Ashburnham Road, looking at the Village Green area and the Site.



Figure 6.3: Wiggins Lane, looking at the Village Green area and the Site.



Figure 6.4: Stretton Road and Woodville Road intersection, looking at the Site.



Figure 6.5: Ham Close.



Figure 6.6: Ham Close.



Figure 6.7: Ham Close as seen from Woodville Road.



Figure 6.8: Ham Youth Centre as seen from Ham Close.



Figure 6.9: Ham Close.



Figure 6.10: Ham Close.



Figure 6.11: Ham Close.

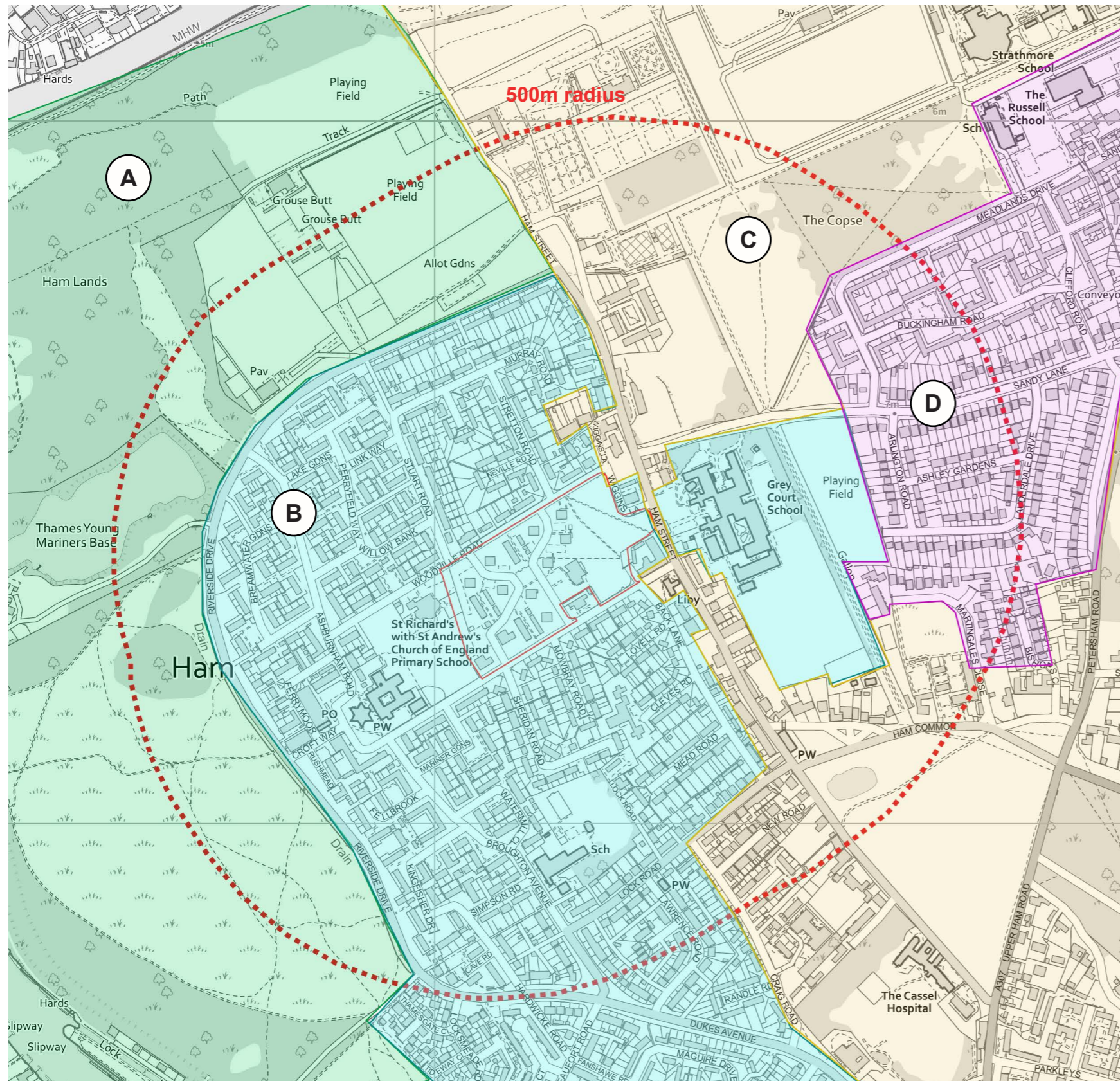


Figure 6.12: Townscape Character Areas map with 500m radius distance of the Site. The Site boundary is outlined in red. Letters A-D refer to the selected areas for the assessment.

Immediate and wider context of the Site

6.4 The Site is located in the Ham, Petersham and Richmond Riverside Ward of London Borough of Richmond Upon Thames. It is about 874 meters west of Richmond Park, and 840 meters east of the River Thames. Immediately to the west of the Site is the St Richard's Church of England School, comprising a cluster of single storey buildings and the Woodville Centre, a building of some architectural interest, dating to the mid-20th century. A 1970's three storey building with a parade of shops on the ground floor occupies the corner of Ashburnham Road and Ham Street, abutting the Site to the east.

Townscape Character Areas

6.5 This part presents the Townscape Character Areas (TCAs) identified around the Site. The criteria for selecting townscape receptors is set out in section 3.0. The selected townscape receptors identified in this section are within the study area, of a radius of 500 metres distance from the centre of the Site, and are assessed in terms of their architecture, materiality, permeability/legibility, urban grain and landscape quality.

6.6 In this section, an appraisal of the existing urban characteristics of each townscape receptor is formulated to establish the baseline condition of the Site and those townscape receptors. It should be noted that the assessments of these TCAs regarding the likely effects of the Proposed Development on each of the townscape receptor can be found in section 8.0 of this HTVIA report.

6.7 The map at figure 6.12 illustrates the TCAs identified and presented in this section. These are marked with letters A to D and listed below for reference.

- TCAA: Ham Lands and green environs
- TCA B: Mid-20th century development
- TCA C: Ham House and Ham Common character area including the historic buildings and structures/areas to the east
- TCA D: Sandy Lane Residential

o **Townscape Character Area A: Ham Lands and green environs (north and west of the Site)**

Baseline

6.8 This TCA lies to the northern and western sides of the Site, approximately 500m from the centre of the Site. Its boundary is defined by the River Thames to the north and west, residential buildings on Riverside Drive to the south, and Ham Street and Ham House to the east. This character area contains parts of a Metropolitan Open Land (MOL), public open land and areas of nature importance (identified in LBRuT local policies), including Ham Lands.

Architecture

6.9 There are only a few free standing buildings scattered within this TCA and no larger built-up areas, and therefore no reference points for assessing architecture.

Materials and landscape

6.10 The landscape is defined by the MOL, as well as the variety of trees, vegetation and landscape features. Overall, this TCA has a 'natural' appearance creating a pleasant environment. In some parts, where it contains sport pitches and club facilities, it has a more formal landscape character (see figures 6.13 and 6.14).

Urban grain

6.11 There are only a few free standing buildings scattered within this character area and no larger built-up areas, and therefore no reference points for assessing urban grain.

Permeability and legibility

6.12 Due to its layout, variety of footpaths, playgrounds, sport grounds, and other landscape features, this TCA is semi permeable. This area is an open space in most parts and is easily accessible. The legibility however is affected by two things: the wild and unattended/informal landscape in some parts which gives less visibility to certain locations outside the character area; and the curve of the River, which the TCA follows around. There are limited signs around this TCA which is not very helpful for wayfinding.

Sensitivity

6.13 This character area includes a MOL, as well as its pleasant nature and adjacent and access to the River Thames, this TCA is considered to have a **medium** level of sensitivity.



Figure 6.13: Riverside Drive.



Figure 6.14: Riverside Drive. Source: Google 2022.

o **Townscape Character Area B: Mid-20th Century development**

Baseline

6.14 This TCA includes the Site, which sits centrally within it. To the west and north the TCA is bound by TCA A beyond Riverside Drive, to the east it is bound by Ham Street and TCA's C and D. This part of the TCA also includes the Grey Court school, its grounds and playing fields. To the south the TCA continues beyond the 500m radius and part Dukes Avenue. A small section of this TCA, to the east of the Site, occupied by the Grey Court School, falls within the Ham House Conservation Area.

Architecture

6.15 The architecture of this area is varied, but primarily dates to the 1950's-1980's. The area immediately to the north of the Site centred around Stretton Road and to the south, centred around Mowbray Road features two storey semi-detached houses dating from the late 1950s and 1960s and forming a number of cul-de-sacs. The remainder of the areas immediately around the Site feature residential blocks of primarily three storeys in height dating from the 60's and 70's, including the Wates Estate to the north west and southwest of the Site. The main features are tile hung elevations with brick ground floors or dark brick elevations with white feature window frames. The quality of architecture and townscape is mixed, with some streets displaying a more cohesive and better maintained character (Wates Estate), while others appearing to be of poorer quality. The school building and grounds lie to the east of the Site and are set behind a large brick wall. The school buildings appear to primarily date to the 1960's, with some more recent additions, with the majority of the buildings rising to two storeys in height. They have mostly been built in red brick and are of no particular architectural interest. St Richard's Church, to the west of the Site, is of some architectural interest, with a star-shaped plan and multiple roof pitches.

Materials and landscape

6.16 The dominant material in the area is red and dark brown brick, as well as hanging tiles. Some of the buildings display pitched tiled roofs, while others have flat roofs. The streets are generally lined with mature trees, giving the area a green character, while the Site is surrounded by the two locally designated green spaces either side of it called Village Green to the east of the Site and The Woodville Centre green space to the west of the Site (both

identified as other open land of townscape importance within LBRuT's local policies) (see figures 6.15 to 6.18).

Urban grain

6.17 The urban grain is mixed, with a finer urban grain appearing in the majority of this TCA. However, the Site displays quite a coarse urban grain, with low density and informal positioning of the built form.

Permeability and legibility

6.18 The permeability of the area is quite poor, with some cul-de-sacs, semi-private streets and a leaky urban grain. In terms of legibility, there are certain buildings like the library, the schools and the church within this character area which aim the legibility and work as landmarks but overall the area has poor legibility as well.

Sensitivity

6.19 This character area is a dominantly residential area, it contains two areas of Townscape Importance (Identified in LBRUT's local policies) and a few buildings of townscape merits like St Richards Church in Ashburnham Road. It is also located on the edge of two conservation areas (to the east). In terms of architecture the majority of the buildings do not have any architectural interest. The sensitivity of this TCA is considered as **low to medium**.



Figure 6.15: Local shops on Ashburnham Road and Croft Way intersection.



Figure 6.16: Ashburnham Road near Ham Street intersection.



Figure 6.17: Woodville Road.



Figure 6.18: Ham Street, from in front of Grey Court School.

- o **Townscape Character Area C: Ham House and Ham Common character area including the historic buildings and associated structures/areas to the east**

Baseline

6.20 This TCA contains two conservation areas: Ham House Conservation Area and Ham Common Conservation Area, and a registered parks and garden (the Ham House garden and its associated areas) and to a large extent follows the boundaries of the two conservation areas. This area is almost split in two near the location of the Site runs along Ham Street at its spine, with larger areas to the north and south of Grey Court School. .

Architecture

6.21 This character area can be divided into three sub areas. The architecture of this townscape character area is very much interrelated to its historical development and its historic character. It contains two conservation areas which are of both architectural and historical importance. The northern part of the character area, where The Ham House CA is located, is associated with Ham House (showcasing the 17th century Jacobean architectural style). In addition it features a cluster of mansion buildings with eighteenth and nineteenth century architectural styles. The majority of the remaining buildings illustrate the popular architectural styles of the later nineteenth and early twentieth centuries. The middle part/sub area is associated with parts of the historic buildings of Ham Street. The southern part of this character area especially the area around Ham Common exhibits a range of architectural styles dated from the 17th century. For instance Avenue Cottage and Avenue Lodge Cottage are examples of seventeenth century vernacular architecture, with the most outstanding surviving features in relation to this being their timber frame roofs. The remaining buildings, both statutory listed or noted as townscape buildings of merit, are principally from the eighteenth and nineteenth centuries, featuring terraced developments or mansion buildings. The dominant material in the buildings of this character area are brick (featuring brown, buff and red colour pallet), stone, timber frames, and stucco facades for some of the buildings.

Materials and landscape

6.22 The landscape is another important element of this TCA. To the north the character area contains the Ham House Garden and the Palm centre and their other associated green spaces featuring formal landscapes, in addition this northern part also feature green spaces and landscape of The Copse (to the south of Ham House Garden) featuring semi-formal and in some part informal landscape. To the south of this character area, Ham Common presenting a formal landscape which (historically) interrelates with the layout of its surrounding buildings. In terms of important local and national policies relevant to landscape, this character area contains two local Vistas of the Ham House (the Proposed Development will not be visible from these two vista corridors), a registered parks and gardens and a Metropolitan Open Land (see figures 6.19 - 6.23).

Urban grain

6.23 A fine urban grain in built areas of this character area is observed particularly around the Ham Common and the Ham Street where the plot sizes are regular and in small and medium sizes. The remainder of the TCA has limited buildings and a very interspersed urban grain.

Permeability and legibility

6.24 In terms of permeability, the parts of the TCA that fall within the Ham House CA have limited permeability due to the nature and layout of the estate. To the south the historic and unplanned development of the area have led to few main roads with plots of them, though there is some permeability due to the openness of Ham Common. There is some legibility in this TCA due to the fact that there are many local landmarks and identifiable places.

Sensitivity

6.25 As per the table on heritage importance in the methodology and because this TCA is primarily formed of conservation areas the sensitivity is considered to be **medium**.



Figure 6.19: Ham Common.

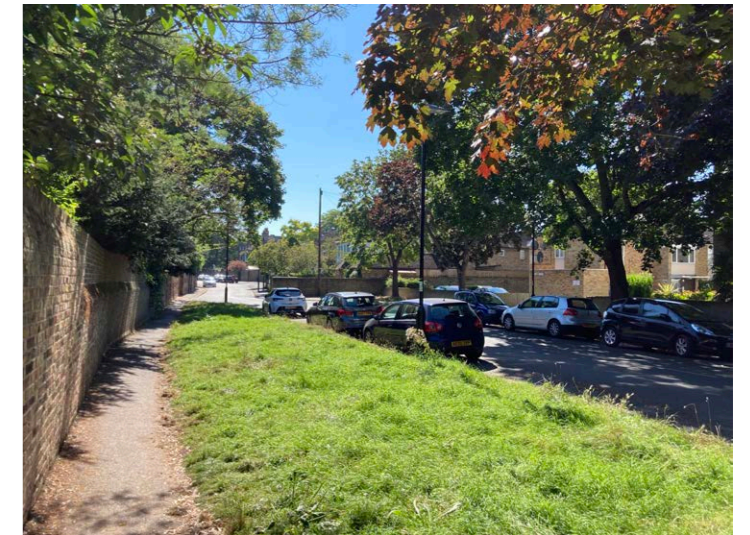


Figure 6.20: Ham Street.



Figure 6.21: Ham Street.



Figure 6.22: Back Lane and Lock Road intersection.



Figure 6.23: Lock Road.

o **Townscape Character Area D: Sandy Lane Residential**

Baseline

6.26 This character area is located approximately 300m to the east of the Site and its boundary is defined by the two conservation areas to the north, west and south.

Architecture

6.27 The architecture of this TCA primarily dates to the 1950s and 1960s, with some along Sandy Lane dating to the 1930s. The TCA includes terraced, semi-detached or detached houses, featuring two storeys, pitched tile roofs and appearing in brown brick or render.

Materials and landscape

6.28 The character area does not contain any open green space. However all the residential blocks and houses have generous rear and front gardens and Sandy Lane in particular has a very green feel, through the provision of grass verges and trees between the road and the plots. The dominant building material for this area is brick, with some instances of timber frames, and stucco facades (see figures 6.24 to 6.26).

Urban grain

6.29 Due to generous and disciplined/consistent plot sizes applied to the houses and residential blocks, the urban grain is considered as medium.

Permeability and legibility

6.30 As a result of the grided street layouts and wide pedestrian pavements there is some permeability, though this is limited to the TCA itself, with not much accessibility to the north and south. The TCA does not have very good legibility due to the street layouts, closed loop streets and non-descript architecture of some of the houses within.

Sensitivity

6.31 The level of sensitivity is considered as **low to medium** due to the primarily residential nature of this TCA.



Figure 6.24: Lauderdale Drive. Source: Google 2022.



Figure 6.25: Meadlands Drive. Source: Google 2022.



Figure 6.26: Lauderdale Drive. Source: Google 2022.