

Built Heritage Impact Statement

ST. CLARE BUSINESS PARK, HAMPTON HILL

JCH00927
St. Clare Business Park, Hampton Hill
Notting Hill Home Ownership Ltd
June 2022

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1.0 INTRODUCTION

This Built Heritage Statement has been researched and prepared by RPS on behalf of Notting Hill Home Ownership Ltd, in support of an application for the redevelopment of the St. Clare Business Park, Holly Road, Hampton, TW12 1PZ (henceforth called The Site). The proposal consists of the demolition of all extant buildings and the provision of 14 houses, 98 flats, B1 commercial floorspace, a podium play space, landscaping and basement parking. This document should be read in conjunction with other supporting information.

The Site is not within a conservation area, nor does it contain any designated or non-designated built heritage assets. However, a section of its eastern boundary line lies adjacent to the High Street (Hampton Hill) Conservation Area and the Grade I listed Bushy Park and Bushy Park Conservation Area are located at circa 50-60 metres beyond the Site. 31 non-designated built heritages within the Hampton Street (Hampton Hill) Conservation Area and 5 non-designated built heritage assets outside the conservation area, including the Old Library building in Windmill Road, also need to be taken into consideration. In respect of these built heritage assets, it is necessary to assess whether the Proposed Development would affect any of their settings and significance.

Under Paragraph 194 of the National Planning Policy Framework (NPPF) there is a requirement for an applicant to “describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance”. Paragraph 195 states that “Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise.”

This document commences with a summary of legislation, planning policy and guidance relevant to built heritage assets and this application. It will then examine the historical development of the local area, including an historical map progression exercise. The Site is assessed as are built heritage assets that may be affected by the Proposed Development, including the contribution of their settings to their significance. The Report concludes with an assessment of impact of the Proposed Development on the significance of relevant built heritage assets.

The conclusions reached in this report are the result of detailed historic research, a walkover survey of the Site and local area, locations map studies and the application of professional judgement. Its findings are based on known conditions at the time of writing and therefore all findings and conclusions are limited to a period of three years. All maps, plans and photographs are for illustrative purposes only.



Figures 1 - 3: Site location

2.0 LEGISLATIVE & PLANNING POLICY FRAMEWORK

2.1 LEGISLATION & NATIONAL PLANNING POLICY

The current national legislative and planning policy system identifies, through the National Planning Policy Framework (NPPF), that applicants should consider the potential impact of development upon 'heritage assets'. This term includes: designated heritage assets which possess a statutory designation (for example listed buildings and conservation areas); and non-designated heritage assets, typically compiled by Local Planning Authorities (LPAs) and incorporated into a Local List or recorded on the Historic Environment Record.

Legislation

Where any development may affect certain designated heritage assets, there is a legislative framework to ensure proposed works are developed and considered with due regard to their impact on the historic environment. This extends from primary legislation under the Planning (Listed Buildings and Conservation Areas) Act 1990.

The relevant legislation in this case extends from section 16/66 (delete as appropriate) of the 1990 Act which states that special regard must be given by the decision maker, in the exercise of planning functions, to the desirability of preserving listed buildings and their setting.

The meaning and effect of these duties have been considered by the courts in recent cases, including the Court of Appeal's decision in relation to Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council [2014] EWCA Civ 137.

The Court agreed within the High Court's judgement that Parliament's intention in enacting section 66(1) was that decision makers should give 'considerable importance and weight' to the desirability of preserving (i.e. keeping from harm) the setting of listed buildings.

Section 69(1) of the Act requires LPAs to 'determine areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance' and to designate them as conservation areas. Section 69(2) requires LPAs to review and, where necessary, amend those areas 'from time to time'.

National Planning Policy

National Planning Policy Framework (Ministry of Housing, Communities and Local Government, July 2021)

In March 2012, the government published the National Planning Policy Framework (NPPF), which was most recently updated in July 2021. The NPPF is supported by the National Planning Practice Guidance (NPPG), which was published online 6th March 2014 and has since been periodically updated.

The NPPF is the principal document that sets out the Government's planning policies for England and how these are expected to be applied. It defines a heritage asset as a: '*building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest*'. This includes both designated and non-designated heritage assets.

Section 16: Conserving and Enhancing the Historic Environment relates to the conservation of heritage assets in the production of local plans and decision taking. It emphasises that heritage assets are '*an irreplaceable resource, and should be conserved in a manner appropriate to their significance*'.

189. Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value⁶⁶. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

190. Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- c) the desirability of new development making a positive contribution to local character and distinctiveness; and
- d) opportunities to draw on the contribution made by the historic environment to the character of a place.

194. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should

be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.

195. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

197. In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness.

199. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

202. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

2.2 NATIONAL PLANNING GUIDANCE

National Guidance

Planning Practice Guidance (MHCLG)

The Planning Practice Guidance (PPG) has been adopted in order to aid the application of the NPPF. It reiterates that conservation of heritage assets in a manner appropriate to their significance is a core planning principle.

Key elements of the guidance relate to assessing harm. It states that substantial harm is a high bar that may not arise in many cases and that while the level of harm will be at the discretion of the decision maker, generally substantial harm is a high test that will only arise where a development seriously affects a key element of an asset's special interest. It is the degree of harm, rather than the scale of development, that is to be assessed. The PPG contains useful information on other aspects (e.g. setting, consultation requirements, viable use which may also be useful for particular schemes)

Overview: Historic Environment Good Practice Advice in Planning

The PPS5 Practice Guide was withdrawn in March 2015 and replaced with three Good Practice Advice in Planning Notes (GPAs) published by Historic England. GPA1: The Historic Environment in Local Plans provides guidance to local planning authorities to help them make well informed and effective local plans. GPA2: Managing Significance in Decision-Making includes technical advice on the repair and restoration of historic buildings and alterations to heritage assets to guide local planning authorities, owners, practitioners and other interested parties. GPA 3: The Setting of Heritage Assets replaces guidance published in 2011. These are complemented by the Historic England Advice Notes in Planning which include HEAN1: Understanding Place: Conservation Area Designation, Appraisal and Management (February 2019, 2nd Edition), HEAN2: Making Changes to Heritage Assets (February 2016), HEAN3: The Historic Environment and Site Allocations in Local Plans (October 2015), and HEAN4: Tall Buildings (December 2015).

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

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

- 1) Understand the significance of the affected assets;

- 2) Understand the impact of the proposal on that significance;
- 3) Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
- 4) Look for opportunities to better reveal or enhance significance;
- 5) Justify any harmful impacts in terms of the sustainable development objective of conserving significance balanced with the need for change; and
- 6) Offset negative impacts to significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

GPA3: The Setting of Heritage Assets (Second Edition; December 2017)

This advice note focuses on the management of change within the setting of heritage assets. This document replaces GPA3: The Setting of Heritage Assets (March 2017) and Seeing History in the View (English Heritage, 2011) in order to aid practitioners with the implementation of national legislation, policies and guidance relating to the setting of heritage assets found in the 1990 Act, the NPPF and PPG. The guidance is largely a continuation of the philosophy and approach of the 2011 and 2015 documents and does not present a divergence in either the definition of setting or the way in which it should be assessed.

As with the NPPF the document defines setting as 'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve'. Setting is also described as being a separate term to curtilage, character and context. The guidance emphasises that setting is not a heritage asset, nor a heritage designation, and that its importance lies in what it contributes to the significance of the heritage asset, or the ability to appreciate that significance. It also states that elements of setting may make a positive, negative or neutral contribution to the significance of the heritage asset.

While setting is largely a visual term, with views considered to be an important consideration in any assessment of the contribution that setting makes to the significance of an asset, and thus the way in which an asset is experienced, setting also encompasses other environmental factors including noise, vibration and odour. Historical and cultural associations may also form part of the asset's setting, which can inform or enhance the significance of a heritage asset.

This document provides guidance on practical and proportionate decision making with regards to the management of change within the setting of heritage assets. It is stated that the protection of the setting of a heritage asset need not prevent change and that decisions relating to such issues need to be based on the nature, extent and level of the significance of a heritage asset, further weighing up the potential public benefits associated with the proposals. It is further stated that changes within the setting of a

heritage asset may have positive or neutral effects.

The document also states that the contribution made to the significance of heritage assets by their settings will vary depending on the nature of the heritage asset and its setting, and that different heritage assets may have different abilities to accommodate change without harming their significance. Setting should, therefore, be assessed on a case-by-case basis.

Historic England recommends using a series of detailed steps in order to assess the potential effects of a proposed development on significance of a heritage asset. The 5-step process is as follows:

- 1) Identify which heritage assets and their settings are affected;
- 2) Assess the degree to which these settings and views make a contribution to the significance of a heritage asset(s) or allow significance to be appreciated;
- 3) Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it;
- 4) Explore ways to maximise enhancement and avoid or minimise harm; and
- 5) Make and document the decision and monitor outcomes.

Overview: Historic England Advice Notes in Planning

In addition to the above documentation, Historic England has published three core Heritage Advice Notes (HEANs) that provide detailed and practical advice on how national policy and guidance is implemented. These documents include: *HEAN1: Understanding Place: Conservation Area Designation, Appraisal and Management* (February 2019), *HEAN2: Making Changes to Heritage Assets* (February 2016) and *HEAN3: The Historic Environment and Site Allocations in Local Plans* (October 2015).

Conservation Principles, Policies and Guidance (English Heritage, April 2008 and emerging policy: Conservation Principles for the Sustainable Management of the Historic Environment (Historic England, Consultation Draft November 2017)

Historic England's original document was primarily intended to ensure consistency of advice and guidance through the planning process and was commended to LPAs to ensure that all decisions about change affecting the historic environment were informed and sustainable. Historic England are currently updating this document in order to set out their approach to conservation in a format that is more accessible and aligned with the language of the NPPF and current legislation. A key change is the heritage values to be used when seeking to understand the significance of a built heritage asset in order to align with the terms used in the NPPF. These are *historic*, *archaeological*, and *architectural* and *artistic*. Consultation on this document closed on 2 February 2018.

2.3 LOCAL PLANNING POLICY & GUIDANCE

Local Planning Policy

In considering any planning application for development, the local planning authority will be mindful of legislation and the framework set by government policy, in this instance the NPPF. As the Site is located within London, the regional *London Plan* must also be taken into consideration as well as the council's own current Development Plan Policies and other material considerations.

The local planning authority for the Site is Richmond Borough Council and development on the Site is therefore subject to the following relevant regional and Local planning policies:

Strategic Policy

The London Plan: Spatial Development Plan for Greater London (Greater London Authority (GLA), March 2021)

The Mayor formally approved a new London Plan, the 'Publication London Plan'. It was prepared to address the Secretary of State's directions of the 13 March 2020 and 10 December 2020 to the Intend to Publish plan. The policies highlighted below merit consideration.

Policy D1 London's form, character and capacity for growth

Boroughs should undertake area assessments to define the characteristics, qualities and value of different places within the plan area to develop an understanding of different areas' capacity for growth. Area assessments should cover the elements listed below:

7) historical evolution and heritage assets (including an assessment of their significance and contribution to local character)

Policy HC1 Heritage conservation and growth

B. Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:

2. utilising the heritage significance of a site or area in the planning and design process

3. integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place

4. delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.

C. Development proposals affecting heritage assets, and their settings,

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

Richmond Borough Council Development Plan Policies

Local Plan (July 2018)

Policy LP 1 - Local Character and Design Quality

To ensure development respects, contributes to and enhances the local environment and character, the following will be considered when assessing proposals:

4. space between buildings, relationship of heights to widths and relationship to the public realm, heritage assets and natural features;

Policy LP 2 - Building Heights

The Council will require new buildings, including extensions and redevelopment of existing buildings, to respect and strengthen the setting of the borough's valued townscapes and landscapes, through appropriate building heights, by the following means:

2. preserve and enhance the borough's heritage assets, their significance and their setting;

Policy LP 3 - Designated Heritage Asset

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

1. Give great weight to the conservation of the heritage asset when considering the impact of a proposed development on the significance of the asset.

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

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

E. The Council's Conservation Area Statements, and where available Conservation Area Studies, and/or Management Plans, will be used as a basis for assessing development proposals within, or where it would affect the setting of, Conservation Areas, together with other policy guidance, such as Village Planning Guidance SPDs.

Policy LP 4 Non-Designated Heritage Assets

The Council will seek to preserve, and where possible enhance, the significance, character and setting of non-designated heritage assets, including Buildings of Townscape Merit, memorials, particularly war memorials, and other local historic features.

Draft Local Plan

Richmond Borough Council are currently preparing a new Local Plan that will replace the extant Plan. This is currently at the consultation on 'Pre-Publication' Draft Local Plan stage with the Plan expected to be adopted in Autumn 2024.

3.0 ARCHITECTURAL & HISTORICAL APPRAISAL

3.1 HISTORICAL DEVELOPMENT OF HAMPTON, RICHMOND

Hampton, Hampton Hill and Hampton Wick were all included within the ancient Anglo Saxon parish of Hampton. It is thought that Hampton derives from “Hamm” and “Ton”, Anglo Saxon for a settlement in a large river bend. In Domesday, the area was called Hamtone. Hampton Hill has undergone several name changes. According to a Parliamentary Survey in 1650 it was known as “The Common” and as New Hampton from c.1800. Its current name has been used from approximately 1870, becoming official in 1890.

After the Norman Conquest, Walter de St. Valery was given the manor of Hampton which the family retained until 1217; it then belonged to the Knights Hospitallers of the Order of St. John of Jerusalem between 1237 - 1514. Subsequently Cardinal Wolsey bought the land, building Hampton Court Palace; Henry VIII then acquired both the manor and palace from Wolsey.

The area was formed around three principle through roads, Upper Sunbury Road, Lower Sunbury Road and the High Street (previously known as Staines Road, Chertsey Road and Twickenham/Heath Road respectively) and various tracks. Three of these ancient tracks now form the modern day triangle that is Church Street, a section of the High Street and Thames Street. St. Mary’s Church stands on a slightly raised vantage point overlooking Thames Street; this positioning is thought to have determined the location of Hampton Town.

The local minister and the churchwarden(s) generally governed the village, working in conjunction with the village constable, local highways surveyor and the overseer of the poor. Due to population increases in the early nineteenth century, St. Mary’s Parish Church was found to be too small and it was decided to build a new church. At about this time Hampton Wick became a separate parish and its Church of St. John the Baptist was constructed; in 1863, Hampton Hill also became a separate parish associated with its Church of St. James’s.

The Waterworks led to further growth within the area, although the majority of land was still in use for farming and grazing. The Thames Valley Railway opened on the 17th of July 1862 via Royal Assent, authorising a line between Fulwell Junction to Shepperton. Hampton Station opened in 1864, however it didn’t become a passenger station until 1901 and then for limited peak hour services only. Following electrification in 1916 the station became home to a busy commuter service.

Hampton became a market garden centre during the 1880s, with as many as 32 nurseries. When the Manor Park Estate was broken up into lots in 1897 by the Earl of Carlisle, extensive areas of land became available for development; this subsequently propelled Hampton’s further growth.

In 1890 a local board was formed for Hampton; by 1895 this had become Hampton Urban District Council and by 1937 this integrated into the Borough of Twickenham. Hampton now forms part of the Borough of Richmond-upon-Thames, created in 1965 when the boroughs of Barnes, Richmond and Twickenham were amalgamated.

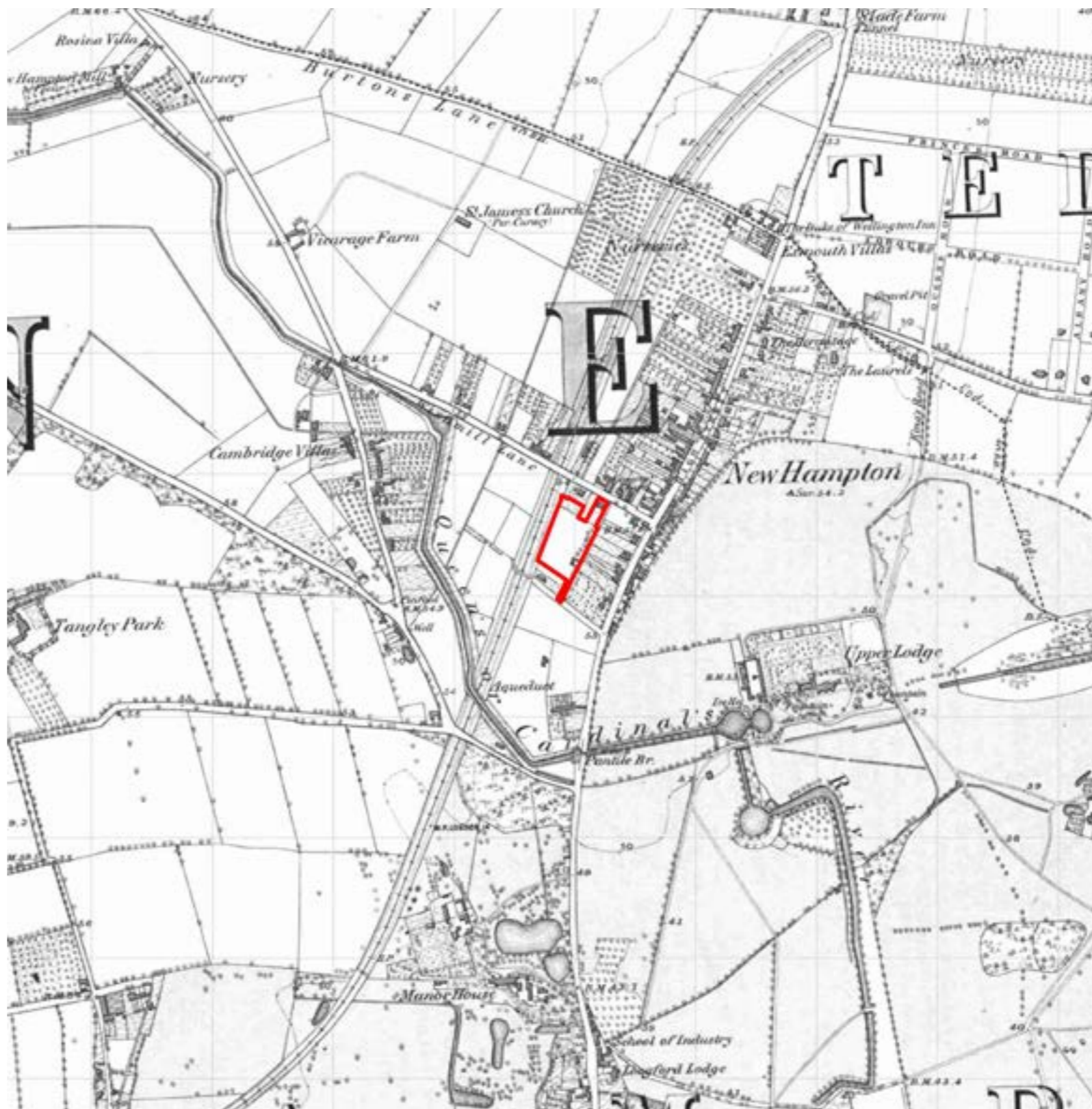


Figure 4:
1865 OS Map of
Hampton area

3.2 HISTORICAL MAP PROGRESSION

In assessing the setting of heritage assets, it is necessary to have an understanding of their historic context, which may reveal historic associations between heritage assets or with the site of proposed development and which may be pertinent to understanding significance. Therefore, this map progression exercise documents past and current development in relation to the Site area, which is shown by a red line on the following maps.

The first map, the 1895 OS, figure 5, illustrates the undeveloped nature of the Site and the local area, with fields to south and west. The majority of development lines the north and east of the High Street; houses to the east almost immediately back onto Bushey Park, whilst development to the west evidences a large number of orchards and/or long gardens attached to dwellings. There are a substantial number of orchards to the north-west of Hampton Hill (as illustrated in figure 4, page 7).

Figure 6, the OS map of 1896, evidences the continued lack of development within the Site, apart from an Old Gravel Pit, some outbuildings and glasshouses. The Thames Valley Railway has already been constructed and can be seen to the rear of the Site.

By 1899, OS map figure 7, development has shifted south and west of the High Street which meant a reduction in the number of fields and orchards and the previous “openness” of the area to the rear west of Hampton High Street.

Figure 8, the 1920 OS map, illustrates the continued growth of the Hampton area, with increasing development, extending out from the High Street. Although not shown in the map, right, a Gravel Pit is evidenced in Bushy Park at circa 80 metres beyond the east of the High Street. The Site now contains a Nursery with numerous large glasshouses and outbuildings.

The 1934 OS map, figure 9, provides large scale detail of the Nursery and associated structures, showing an increase in the size of the glasshouses. The Library, Windmill Road, is labelled on this map, as is the Public House at 99 High Street.



Figure 5 (above): 1865 OS map Figure 6 (above right): 1896 OS map Figure 7 (right): 1899 OS map Figure 8 (below left): 1920 OS map Figure 9 (below right): 1934 OS map

3.2 HISTORICAL MAP PROGRESSION

Figures 10 to 14, right, illustrate the continuing evolution of the area with significant residential development already established by the 1960s. The Site changed use from a Nursery to a Builder's Yard; the St. Clare Business Park was established in the late 1970s.



Figure 10 (above): OS map 1962; Figure 11 (above right): OS map 1973; Figure 12 (right): OS map 1985; Figure 13 (below): OS map 1993; Figure 14 (below right) OS map 2003

3.3 HISTORIC ENVIRONMENT RECORD

Initial desk-based research, utilising Historic England's National Heritage List for England and Richmond Borough Council's Local List, identified 51 built heritage assets within a 500 metre search radius of the Site. These are illustrated in figure 15, right.

After further assessment it was considered that a number of these would not experience any effect from the Proposed Development and they were therefore scoped out from further analysis. This is due to the fact that the Site does not contribute to their settings and significance or that they are well removed and/or heavily screened from it and therefore they do not require further assessment within this report.

Built heritage assets that may be affected by the Proposed Development are detailed in the table below:

Built Heritage Assets	
Designated Built Heritage Assets	
Bushy Park - Grade I	
Conservation Areas	
High Street (Hampton Hill)	
Bushy Park	
Non Designated - Locally Listed Buildings	
<u>Within Hampton Street (Hampton Hill) Conservation Area</u>	
8,10,12,14,16,30,32,34,36,40,41,42,43,57,59,61,77,79,80,82,87,89,91,93,99 High Street.	
1,3,4,4a,4b,4c Windmill Road	
<u>Outside Hampton Street (Hampton Hill) Conservation Area</u>	
Library, Windmill Road (frontage only); 13,15,17,19,21,23 Holly Road	

Table 1: List of built heritage assets that may be affected by the Proposed Development

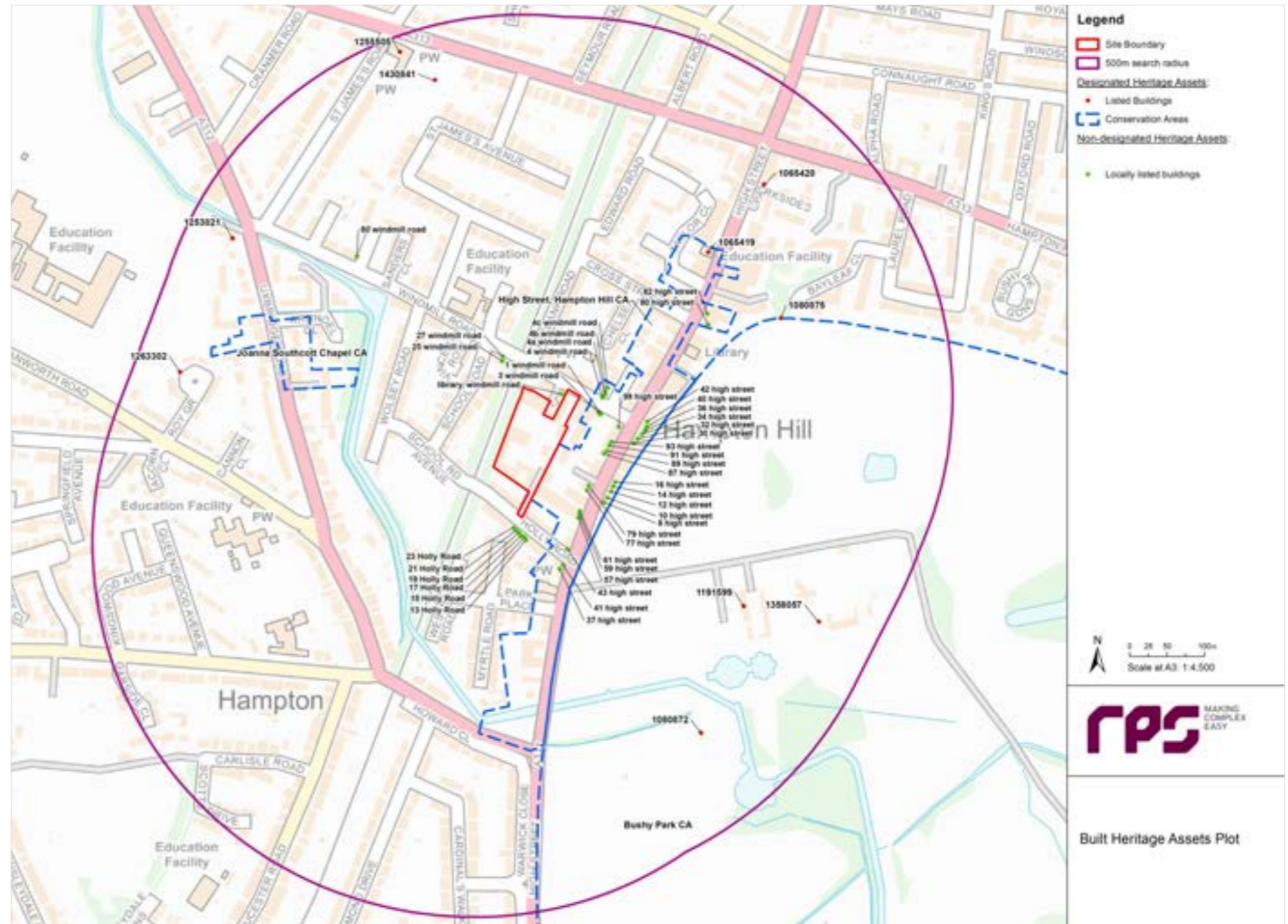


Figure 15: Built Heritage Assets in relation to the Site (outlined in red) (OS mapping, HM Stationer's office and English Heritage 2019).

4.0 ASSESSMENT OF SIGNIFICANCE

4.1 SITE ASSESSMENT

The St. Clare Business Park is located within the Borough of Richmond-upon-Thames, an outer borough of London, bisected by the River Thames which forms its northern and southern boundaries.

The Business Park was constructed in the late 1970s and consists of a multifunctional modern estate with a variety of office/workshop buildings of either brick or corrugated iron, around an internal yard/roadway. There is ample parking within the estate.

There are no designated or non-designated built heritage assets located within the Site and it does not form part of the Hampton Street (Hampton Hill) Conservation Area. It does, however, adjoin the rear of the conservation area to its centre east as illustrated by figure 19 right. The Park is considered as 'out of keeping' with the proximate townscape.



Figure 16: Principal building at entrance to Site



Figure 17: Dis-used building to centre-east of Site



Figure 18: Sheds located to centre-west of Site



Figure 19: Rear of Site adjacent to Hampton Street (Hampton Hill) Conservation Area

4.2 REGISTERED PARK & GARDEN: BUSHY PARK - GRADE I, LIST UID:1244861

History

Bushy Park is the second largest of the Royal Parks, covering 445ha and contains c.4000 trees and c.325 deer. It opened to the public in 1893 but evolved over a long period of time prior to this, commencing as a deer park in 1491, with 162ha of arable farmland enclosed by Giles d'Aubrey. Subsequently Cardinal Wolsey, Henry VIII, James I, Charles Montagu, 1st Earl of Halifax, and Prince William, Duke of Clarence, either owned, added to or worked on the park; new ponds were formed in it, a canal cut from the River Colne was diverted through it (called the Longford River) and a number of structures were built within it. The park is connected to the Hampton Court Park, however it is now separated from this by the Hampton Court Road. During WWI the Upper Lodge of Bushy Park was utilised as the King's Canadian Hospital, whilst during WWII, areas of the park were used as a base camp and Allied Headquarters.

Description

The park lies on flat, low-lying ground that forms part of the Thames flood plain. It contains a Scheduled Monument, the Old Brew House (also Grade II listed), the Grade I listed Arethusa or 'Diana' Fountain and eleven royal lodges, the principal ones being Bushy House, formerly Lower Lodge, Grade II* listed and Upper Lodge (Grade II listed). The park is generally enclosed by boundary walls, which are from the sixteenth, seventeenth and nineteenth century respectively, some of which are Grade II listed. Trees are mostly in scattered clumps or small plantations; there are also areas of grassland and bracken which allows deer cover. Amongst its significant tree population, a number of ancient oaks to the north-west perimeter of Hampton Hill, survive from the sixteenth century. The principle entrance to Bushy Park is from the south at Hampton Court Road, via Hampton Court Gate, passing the Grade II listed Hampton Court Gate Lodge. Further gates generally provide access for pedestrians and three main pedestrian paths also divide the park. Chestnut Avenue divides the park north/south and a branch of the Longford River divides land at the east north-east/south-west.

Significance

Bushy Park has high historical and aesthetic significance and is listed at Grade I to reflect this. It evidences remains of medieval farmland, was a Tudor deer park, possesses recently restored seventeenth century water gardens and contains a number of listed lodges and the Grade I listed Arethusa or 'Diana' Fountain. The Park also forms the majority of the extended setting of Hampton Court Palace.

Setting

Bushy Park is generally bounded by residential development to the north, (located to the south and south-west of Hampton Road), by Sandy Lane to the north-east, by Hampton Court Road to the south and south-west and by High Street, Hampton to west. Hampton Court Park lies just beyond its southern boundary and Hampton Court Palace at c.200 metres.



Figure 20: Bushy Park, view east taken in proximity to western boundary of the park, c.20 metres from the High Street.

4.3 CONSERVATION AREA - BUSHY PARK (AREA 61)

Bushy Park Conservation Area was designated on the 29th of January 1991 and the council provides a Conservation Area Statement and Map (Appendix C).

The conservation area adjoins Bushy Park Gardens and Park Road (Teddington) Conservation Areas to small sections of its northern boundary; Hampton Wick Conservation Area to east; Hampton Court Park Conservation Area to south and south-east; Hampton Court Green Conservation Area to south; Hampton Village Conservation Area to south and south-west; High Street (Hampton Hill) Conservation Area to west and to north.

The conservation area encompasses all of Bushy Park, which has been described in detail on the preceding page. In their conservation statement the council writes that views are an important part of the park's landscape, particularly in respect of north/south and east/west vistas and the settings of listed buildings within it.

Contribution of setting to significance of Bushy Park and Bushy Park Conservation Area

The setting of Bushy Park generally comprises residential development and modern roadways which make a neutral contribution to its setting; however, historic buildings and roadways in close proximity to the park's various boundaries make a positive contribution to its wider setting. To its south-east, Hampton Court Park and Palace make an extremely positive contribution to its setting, due in part to the historic association between them.

Contribution of Site to significance of Bushy Park and Bushy Park Conservation Area

The Site does not contribute to the significance of Bushy Park and Bushy Park Conservation Area.



Figure 21: View west from Bushy Park c.20 metres from the High Street

4.4 CONSERVATION AREA - HIGH STREET (HAMPTON HILL) (AREA 38)

The High Street (Hampton Hill) Conservation Area was designated in September 1982 and extended in 1996 and 2019. The extensions encompassed the organic development of the area and included additional commercial development and residential development off the High Street that was considered to be of high quality. A Conservation Area Statement and Map (Appendix B) has been provided by the council. Locally listed buildings within the conservation area are included within this assessment.

History

The High Street is the historic link between Hampton village and Fulwell. The conservation area is generally aligned along Hampton Hill High Street; its most southerly point is at Uxbridge Road and its northerly point lies just beyond Park Road. To the east it runs adjacent to Busy Park and adjoins the Bushy Park conservation area. Development grew along the High Street following the 1811 Enclosure Act. The surrounding residential areas also developed, particularly where they extended from the High Street and grander properties were constructed along the more historic roads, for example Park Lane. Further changes took place to the High Street when it was widened for a tram route in 1910 (now defunct). To the north, rear of the High Street, large apartments were developed during the late twentieth century.

Character

The conservation area is the nucleus of Hampton Hill and is the original historic linear settlement. In general it is formed of commercial and residential buildings that still maintain the character of a traditional village high street. There are a large number of locally listed buildings within the area due to the retention of some attractive original shopfronts and various two storey Victorian houses set on traditional long narrow plots. There are still historic lanes to the rear of the High Street which allow a number of glimpsed views, providing interest to the general street scene. However, although views along the High Street are attractive, there are a number of 1970s office buildings which detract from the village-like feel of the area. Equally, views between these buildings towards the rear of the conservation area are unappealing.

Materials within the area are predominantly of yellow stock brickwork with red brick dressings and sliding sash windows of timber. Otherwise buildings are painted or rendered. Roofs are generally of shallow pitched slate and have brick chimneys.

Significance

The significance of the conservation area lies in its architectural and historical special interest due to the variety of built heritage assets contained therein.



Figures 22 -33: Various views of the High Street (Hampton Hill) Conservation Area along the High Street and Windmill Road

4.4 CONSERVATION AREA - HIGH STREET (HAMPTON HILL)

Setting

The conservation area is bounded by residential development to the north, the Grade II listed high brick walls of Bushy Park to the east, the A312 Uxbridge Road to the south and by a combination of residential units and the Site to the west. Its wider setting consists of the local townscape of Hampton and Hampton Hill. The park boundary wall is lower to the Pantile Bridge, over the River Longford to the south of the conservation area; this allows wide open views into the park. This is in stark contrast to the north of the High Street which is of an enclosed character.

Figures 34 - 42, right illustrate further views of the conservation area and its immediate setting in Windmill Road. These include a number of unattractive aspects, such as the 1970s office development, views between the modern office development towards the rear of the conservation area and views of the extant site from Windmill Road.

Contribution of setting to significance

In general, development surrounding the conservation area makes a neutral contribution to its setting and thus significance. The brick walls of Bushy Park and the wider landscape setting that it provides to the east of the conservation area continue to allow the distinctive village character of the area to prevail.

Contribution of Site to significance

The Site makes a negative contribution to the setting and thus significance of the conservation area.



Figures 34 - 42: *Top Row, left to right:* 1970s office development to left of image; views towards part of the rear of the conservation area between 63-71 High Street (1970s office development), view towards part of the rear of the conservation area from the High Street. *Middle Row, left to right:* view towards the Site from Windmill Road in the immediate setting of the conservation area; view of part of the rear boundary line of the conservation area from the Site; view along part of the rear boundary line of the conservation area towards site entrance and Holly Road *Bottom Row, left to right:* view of part of the rear of the conservation area boundary line from the Site; view towards the Site from Windmill Road in proximity to the conservation area boundary line in Windmill Road; neglected building in the High Street

4.5 NON-DESIGNATED HERITAGE ASSETS - OUTSIDE HAMPTON HILL CONSERVATION AREA

The Library, Windmill Road (frontage only)

This late nineteenth century building has had a variety of uses, fire station, library, dwelling house and latterly as an administrative office. The structure has undergone renovation and conversion and it is only the frontage that is of townscape merit on Richmond Council's local list. This consists of an attractive dutch gable style composition in red brick, stone detailing and sash windows. The western part of the building retains the fire station type doors. Small front garden, new residential development and parking immediately to rear, beyond which sits the Site. The Business Park is extremely visible to the east and rear of the building

13,15,17,19,21,23 Holly Road

These four buildings form part of a longer terrace of houses. They are two storey nineteenth century dwellings of brick/rendered brick and tiled roofs, set in narrow plots with rear gardens and short front gardens. The Business Park entrance is located in proximity to and visible from the terrace and there is intervisibility with this and a number of structures within the Park.

Significance

They have architectural and historical significance, but are not of sufficient status to be statutorily listed and are therefore considered as of local, limited interest only.

Setting

These buildings are not located within the High Street (Hampton Hill) Conservation Area, however they are in close proximity to it. Their setting consists of the local townscape of Hampton

Contribution of setting to significance

In general, development surrounding these buildings makes a neutral contribution to their setting and thus significance.

Contribution of Site to significance

The Site makes a negative contribution to the setting and thus significance of these non-designated built heritage assets.



Figure 43 (above): Library, Windmill Road

Figure 44 (below): 13, 15, 17, 19, 21, 23 Holly Road



5.0 PROPOSALS & ASSESSMENT OF IMPACT

5.1 DEVELOPMENT PROPOSALS

The Proposed Development consists of residential and commercial development, basement parking, access, a podium play space and landscaping. Block heights range up to a maximum of 5 storeys.

Development is proposed as follows:

- 112 new homes, including 50% affordable homes;
- 2047 sqm of high quality, flexible commercial space;
- 106 car parking spaces including electrical charging points;
- 239 residential and commercial cycle parking spaces;
- A sustainable energy strategy featuring air source heat pumps;
- New trees, a podium garden, landscaping and play space;
- A new high-quality pedestrian and vehicle entrance on Windmill Road;
- Extensive greening and biodiversity uplift throughout;
- A new pedestrian and cycle connection created between Holly Road and Windmill Road.

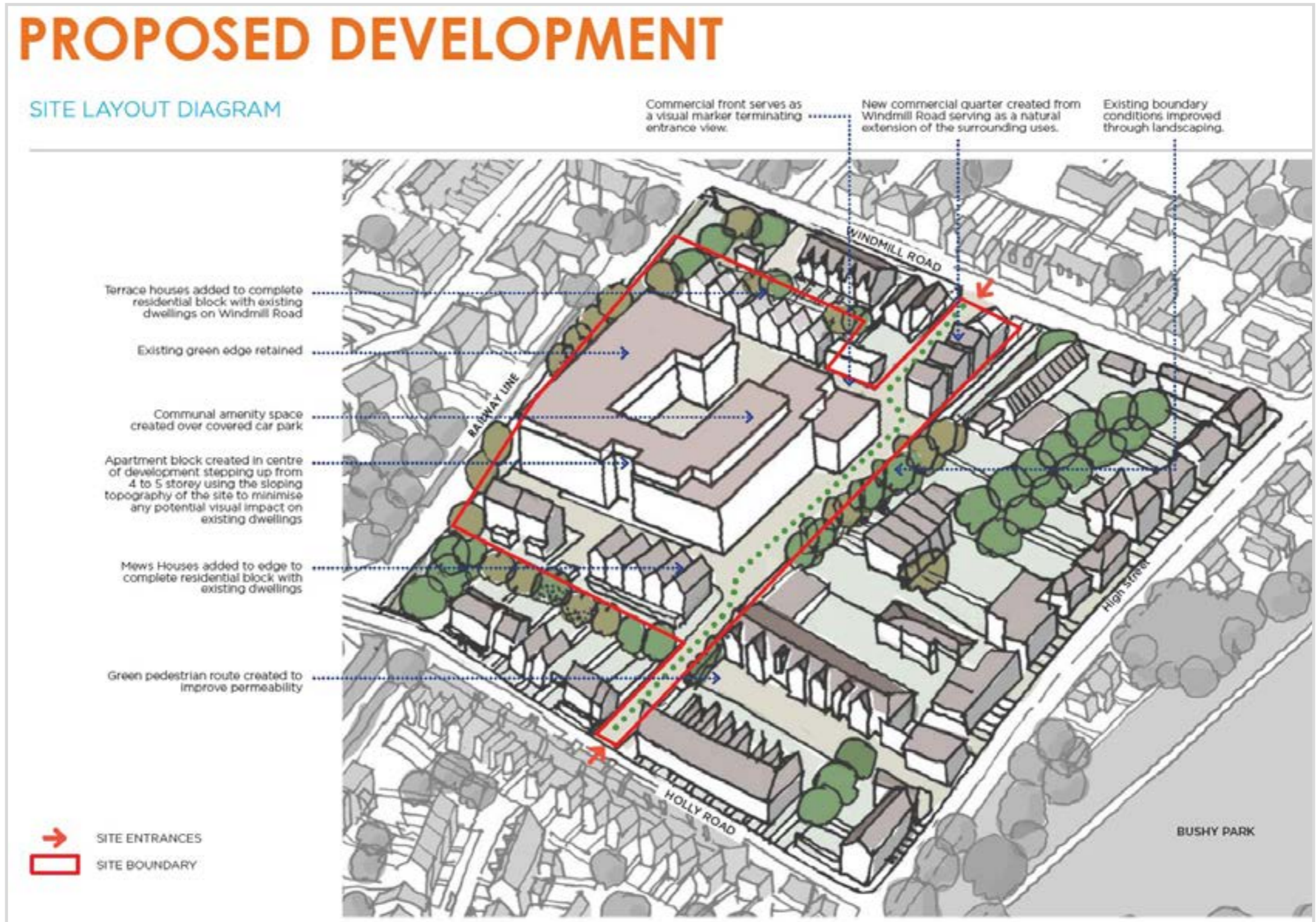


Figures 45-48, clockwise from top left: Proposed Development as viewed from Windmill Road, in proximity to the locally listed Library; Proposed houses; Proposed apartment blocks (AHR)



5.1 DEVELOPMENT PROPOSALS

Figure 49: Proposed Development



5.1 DEVELOPMENT PROPOSALS

Figure 50: Proposed Development



5.1 DEVELOPMENT PROPOSALS

Figures 51-52 : Proposed Development



5.2 ASSESSMENT OF IMPACT

The Site is not within a conservation area, nor does it contain any designated or non-designated built heritage assets. However, a section of its eastern boundary line lies adjacent to the High Street (Hampton Hill) Conservation Area and the Grade I listed Bushy Park and the Bushy Park Conservation Area are located at circa 50-60 metres beyond the Site. 31 non-designated built heritage assets lie within the Hampton Street (Hampton Hill) Conservation Area and 5 non-designated built heritage assets outside the conservation area, including the Old Library building in Windmill Road, also needed to be taken into consideration.

After detailed examination and a site visit, it was established that 39 built heritage assets could potentially experience some change to their settings from the future development of the Site and required further examination. Other identified built heritage assets within the local area would not experience any effect from the Proposed Development and these were therefore scoped out from any further assessment. This is due to the fact that the Site does not contribute to their settings and significance or that they are well removed and/or heavily screened from it and therefore they do not require appraising within this report.

There would be no direct, material harm to any of these built heritage assets due to the proposed redevelopment of the Site, however, it was necessary to assess the contribution of the proposed site to their settings and whether they would be affected by the Proposed Development. The 39 built heritage assets potentially affected by the Proposed Development are listed in table 2, below.

Built Heritage Assets
Designated Built Heritage Assets
Bushy Park - Grade I
Conservation Areas
High Street (Hampton Hill)
Bushy Park
Locally Listed Buildings
<u>Within Hampton Street (Hampton Hill) Conservation Area</u>
8,10,12,14,16,30,32,34,36,40,41,42,43,57,59,61,77,79,80,82,87,89,91,93,99 High Street.
1,3,4,4a,4b,4c Windmill Road
<u>Outside Hampton Street (Hampton Hill) Conservation Area</u>
The Old Library, Windmill Road (frontage only)
13,15,17,19,21,23 Holly Road

Table 2: List of built heritage assets that may be affected by the Proposed Development

In order to determine whether there would be any impact to the settings of these built heritage assets, this section references the *Historic Environment Good Practice Advice in Planning, Note 3: The Setting of Heritage Assets (December 2017) (HEGPA3)*. This GPA sets out a 5-step process which assesses the potential effects of a Proposed Development on the setting and significance of a heritage asset.

- 4) Explore ways to maximise enhancement and avoid or minimise harm; and
- 5) Make and document the decision and monitor outcomes.

Step 1 - Identify which heritage assets and their settings are affected

Section 3.3, page 10 of this Report, identified built heritage assets in the local area through initial desk-based research, utilising Historic England's National Heritage List for England and Hillingdon Council's Heritage Asset Map. The built heritage assets that may be affected by the Proposed Development have been detailed in Table 2, left.

Step 2 - Assess the degree to which these settings and views make a contribution to the significance of a heritage asset(s) or allow significance to be appreciated;

Designated Built Heritage Assets

Bushy Park, Grade I and Bushy Park Conservation Area

The setting of Bushy Park generally comprises residential development and modern roadways which make a neutral contribution to its setting; however, historic buildings and roadways in close proximity to the park's various boundaries make a positive contribution to its wider setting. To its south-east, Hampton Court Park and Palace make an extremely positive contribution to its setting, due in part to the historic association between them.

Hampton Hill (High Street) Conservation Area (including its locally listed buildings)

In general, development surrounding the conservation area makes a neutral contribution to its setting, apart from the extant Site, which makes a negative contribution to its setting and significance. The brick walls of Bushy Park and the wider landscape setting that it provides to the east of the conservation area continue to allow the distinctive village character of the area to prevail.

Locally listed buildings

Development surrounding the Library, Windmill Road and 13,15,17,19,21,23 Holly Road makes a neutral contribution to their settings, apart from that comprising the Hampton Hill Conservation Area which makes a positive contribution. The extant Site makes a negative contribution to their settings and significance, particularly in respect of the Library which sits in close proximity to it.

Step 3 - Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it;

Please refer to visuals provided on pages 20 and 21 in conjunction with this assessment and the Visuals Location Map on page 19.

Bushy Park and Bushy Park Conservation Area

The council is concerned that "development pressure may harm the balance of the landscape-dominated setting, and the obstruction or spoiling of views, skylines and landmarks" (Bushy Park Conservation Area Statement 61). In respect of the Proposed Development, views were examined from within the interior of the park in proximity to its western boundary wall. None of Bushy Park's built heritage assets are in proximity to this location.

Photo/visual 1 illustrates a "before and after" to the setting of Bushy Park in respect of this viewpoint. The Proposed Development is evidenced as barely visible above the existing line of the village; furthermore, the visual does not show existing tree cover in proximity to this boundary.

The Proposed Development is therefore considered to make a neutral contribution to the setting and significance of both Bushy Park and the Bushy Park Conservation Area.

Hampton Hill (High Street) Conservation Area

Photos/Images/Visuals 2 - 6 illustrate before and after effects of the Proposed Development to various areas of Hampton Hill (High Street) Conservation Area's setting.

Visual 2 evidences a positive impact to the conservation area, with the Proposed Development providing an attractive terminus viewpoint between 63-71 High Street. It is important to note that 63-71 High Street was granted planning permission for redevelopment in 2018 to provide a four storey building and six town houses (ref: 16/4553/FUL), which has not yet been implemented. Thus this area of the High Street and the conservation area will still comprise modern development.

Visual 3 evidences that there would be limited intervisibility with the Proposed Development from this viewpoint. However, development that would be visible is considered to make an attractive contribution to the setting of the conservation area.

Visual 4 illustrates that there would be limited intervisibility between the Site and the High Street from this point. Visible development is considered to make a neutral impact to the setting of the conservation area.

Locally listed buildings

Visual 5 demonstrates limited intervisibility between 15,17,19,21Holly Road and the Proposed Development. Furthermore, any visibility of development

5.2 ASSESSMENT OF IMPACT

is considered to make a positive contribution to the setting of these locally listed buildings.

Visual 6 evidences the positive impact that the Proposed Development would have on the setting of the Library, Windmill Road. It is obvious that the carefully thought through design, materials and attractive landscaping of the Proposed Development allow the Library to be better appreciated.

Overall it is considered that the Proposed Development makes either a neutral or positive contribution to the setting and significance of the Hampton Hill (High Street) Conservation Area and a positive contribution to the setting of locally listed buildings outside the conservation area.

Step 4 - Explore ways to maximise enhancement and avoid or minimise harm

It has been found that the Proposed Development makes a neutral contribution to the setting and significance of both Bushy Park and the Bushy Park Conservation Area. Their settings would be preserved and the landscape-dominated setting of the area would not be affected.

It has also been found that the Proposed Development makes either a neutral or positive contribution to the setting and significance of the Hampton Hill (High Street) Conservation Area and locally listed built heritage assets outside the conservation area. The Proposed Development utilises high quality proportionate design, good quality materials (sympathetic to the style and materials of built heritage assets) and attractive landscaping. Therefore, it is considered that no further mitigation is required in respect of the built heritage assets assessed in this report.

Step 5 - Make and document the decision and monitor outcomes

This Step is outside the Scope of this Report.

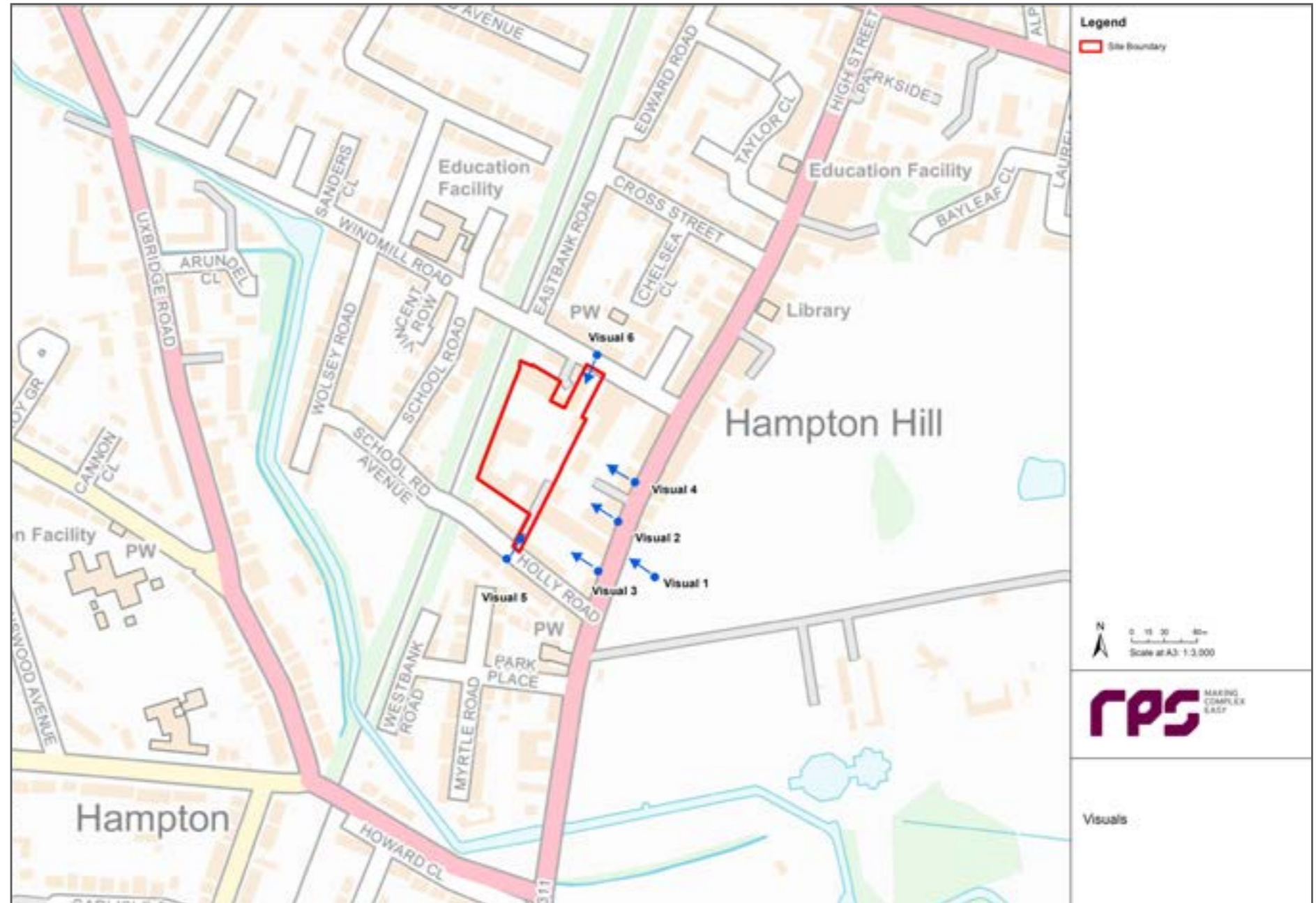


Figure 49: Visuals Location Map

5.3 ASSESSMENT OF IMPACT - VISUALS

Photos and Visuals 1 - 3, right, illustrate the following:

Photo/Visual 1 (Top)

From within Bushy Park in proximity to the western boundary wall of the park, with the High Street (Hampton Hill) Conservation Area to rear of image.

Photo/Visual 2 (Centre)

Looking towards the rear of High Street (Hampton Hill) Conservation Area and the Site between 63-71 High Street (As already noted in section 5.2, page 18, 63-71 High Street was granted planning permission for redevelopment in 2018 which has not yet been implemented).

Photo/Visual 3 (Bottom)

Looking towards the rear of High Street (Hampton Hill) Conservation Area and the Site from the High Street.



Photos/Images and Visuals 4 - 6 , right, illustrate the following:

5.3 ASSESSMENT OF IMPACT - VISUALS

Photo (Image)/Visual 4 (Top)

Looking towards the rear of High Street (Hampton Hill) Conservation Area and the Site from the High Street.

Photo (Image)/Visual 5 (Centre)

Looking towards the Site from the pavement in proximity to 13,15,17,19,21,23 Holly Road.

Photo/Visual 6 (Bottom)

Looking towards the Site from Windmill Road, in proximity to the locally listed library that sits to the right of the car garage.



6.0 CONCLUSION

This Built Heritage Statement has been researched and prepared by RPS on behalf of Notting Hill Home Ownership Ltd, in support of an application for the redevelopment of the St. Clare Business Park, Holly Road, Hampton, for demolition of all extant buildings and the provision of residential development, commercial floorspace, a podium garden, play space, landscaping, pedestrian and cycle connectivity and car/cycle parking.

The Site is not within a conservation area, does not contain any designated or non-designated built heritage assets, nor would there be any direct, material harm to the built heritage assets assessed within this Report due to the Proposed Development. However research identified 39 built heritage assets whose settings and the contribution these make to their significance may be affected.

After further analysis it was, however, found that the development proposals would make either a neutral or positive contribution to the settings and thus significance of all the built heritage assets assessed.

It has been shown that development within the Site can be delivered with either a neutral or positive contribution to the settings and thus significance of built heritage assets in the vicinity, and is in accord with both national and local planning policies and guidance.

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APPENDIX A: HAMPTON HILL CONSERVATION AREA



APPENDIX B: BUSHY PARK CONSERVATION AREA





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