



Our Ref: TM/Cote/1/tm

Your Ref:

Date: 12 January 2024

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Dear Sir/Madam

Planning Application Ref 23/3208/FUL
St. Catherine's School, Cross Deep, Twickenham, London, TW1 4QJ

1. We write on behalf of Ms Hande Cote, the owner/occupier of the neighbouring property at 42 Cross Deep, to raise objection to the above application seeking full planning permission for a new music and art building, following the demolition of existing single storey building and extension, and associated works.
2. As the Council will be aware, this follows the decision to refuse planning permission for a similar form of development under application Ref 22/3662/FUL.
3. That application, which included three storeys of development, was rejected on the grounds that the proposed building would be of an inappropriate design, scale, bulk mass and height, resulting in an unsympathetic overdevelopment of the site, to the detriment of the character and appearance of the area.
4. Particular concern was had to the severe adverse impact on the Twickenham Riverside Conservation Area and Pope's Grotto Historic Park/Garden. The Council found that further harm would be caused to the adjacent locally designated Pope's Grotto Park Other Land of Townscape Importance.
5. The Council's own report confirms that St. Catherine's School, which is associated with Pope's Garden, is a site of considerable historic and archaeological importance, falling within the Twickenham Riverside Conservation Area and including a Victorian neo-Tudor Lodge, a locally designated Building of Townscape Merit, that is particularly affected.

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6. The wider setting includes Pope's Grade II listed Grotto Historic Park/Garden, which connects St. Catherine's School with Radnor House School. Both the garden and part of Radnor School are statutorily listed and there are various other Buildings of Townscape Merit within the immediately locality.
7. The Lodge is identified within the conservation area as a building of important historic and architectural significance. This historic building can be appreciated from many angles and a key planning consideration in respect of the site has been to ensure that modern buildings are sensitively sited to preserve those open views.
8. The proposed music building was previously found to harm the setting of the Lodge as a result of its inappropriate and excessive size, scale, height, bulk and massing, combined with the manner in which it would have intruded on the restricted space behind the locally listed building. The development would intrude on important views of the Lodge, including from street level in Cross Deep.
9. Important views through to the historic landscape beyond would also have been lost, to the wider detriment of the conservation area and adjacent park and garden. The proposed building would also have been highly visible from the adjacent locally designated Pope's Grotto Park Other Land of Townscape Importance, thereby harming its open aspect and setting.
10. It was noted that although there were other three storey buildings on the site, these were set apart from the Lodge in order to preserve its setting and significance. Neither do the existing buildings obstruct important views in and across the site to the same degree.
11. None of this has changed.
12. This remains a highly sensitive site, where the scope for further development is necessarily limited and the potential for heritage assets of the highest importance to be damaged requires the most careful consideration.
13. This revised application includes a reduction in the storey height of the building. Whilst this is to be welcomed insofar as it goes, this does not mean the new scheme is acceptable or that the previous reasons for refusal have been overcome. In fact, we submit that fundamental objections remain unresolved.
14. In particular, although the height of the proposal has been reduced, it remains a substantial structure. In its overall size, scale, bulk and massing, it would still overwhelm the modest form and proportions of the Lodge Building of Townscape Merit. Even in terms of height, the proposal would still not be subservient to the Lodge. In terms of its overall visual impact, the proposal would appear highly dominant and visually overbearing.
15. As regards the siting of the development, the setback in relation to the Lodge has only been increased very marginally. It remains in extreme proximity. It also remains the case that the proposal would give rise to a cramped and congested layout on a part of the site where there is simply insufficient space to accommodate new development without encroaching on the setting of the locally listed building and closing down important views.
16. As far as those views are concerned, the development would still obstruct important views of the Lodge, including from street level in Cross Deep, and restrict views through to the historic landscape beyond. In short, the same fundamental objections to the previous application remain unresolved.

17. Much is made in the supporting documentation of the need for new facilities at the school. However, in planning terms it cannot be assumed that a particular site is capable of accommodating further development in a manner that would not compromise townscape quality or otherwise breach important planning policies for the protection of local character and heritage.
18. In practice, there are always limits to the development potential of any site. In this case, the area in the vicinity of the Lodge is already intensely developed. A precarious balance has been preserved whereby those modern buildings do not encroach unduly upon the setting of important heritage assets on and adjacent to the site.
19. This proposal would fatally upset that balance.
20. This is amply demonstrated by comparing the impact of the previous refused scheme with that of this latest proposal. Far from achieving a significant reduction in visual impact, what is offered is a slight and marginal reduction in the degree of harm. In no way does this overcome the reasons for refusal of the previous application. On the contrary, it demonstrates that the site is inherently unsuitable for significant new development in this location.
21. In planning policy terms, the approach to be taken in such cases is clearly set out in the National Planning Policy Framework. This makes it clear that the desirability of sustaining and enhancing heritage assets must be taken into account and is capable of carrying great weight.
22. Adopted development plan policies, including Policies LP1, LP2, LP3, LP4, LP5 and LP14 of the Council's adopted Local Plan 2018, likewise seek to afford the highest levels of protection to local character, heritage assets, views and vistas and Open Land of Townscape Importance.
23. Moreover, under the approach set out in the Framework, the greater the significance of the heritage assets, the greater the weight that must be accorded to their conservation. Any harm to, or loss of, significance requires clear and convincing justification.
24. In this case, we have shown that substantial and irrevocable harm would be caused to the setting and significance of the Lodge Building of Townscape Merit, the Grade II listed Pope's Grotto Historic Park/Garden, the Twickenham Riverside Conservation Area and the adjacent locally designated Pope's Grotto Park Other Land of Townscape Importance.
25. Whilst the proposal would not result in total loss or substantial harm in the terms set out in the Framework, the degree of harm would still be considerable and would affect multiple assets of local and national importance. The presumption in planning policy terms is that such harm requires special justification.
26. This harm should be weighed against the public benefits of the proposal including, where appropriate, securing the optimum viable use of any heritage assets. However, any such benefits in this case are extremely limited. In the first instance, the proposal is not necessary to secure the optimum viable use of any heritage asset.
27. In other respects, it is argued that the proposal would create more space for teaching art and music. However, the fact is the existing school already has facilities for art and music. Moreover, St. Catherine's is a fee-paying private school. Although some limited opportunities are proposed to allow community groups and local schools to use the new facilities, the wider public benefits would by their very nature be limited.

28. Finally, the proposals are not supported by any detailed assessment of alternative ways of meeting any legitimate educational needs. For example, these might instead be met by refurbishment and improvement of existing facilities or a more appropriate proposal for new build development on a less sensitive part of the site.
29. It follows, in planning policy terms, that the public benefits of the proposal are limited are entirely insufficient to outweigh the substantial harm that would be caused to the significance of the heritage assets described above and which the Council has previously accorded great weight in its decision to refuse the previous application.
30. In other respects, our client remains concerned that the proposal, if permitted, would cause substantial harm and potential damage to neighbouring properties and the living conditions of local residents, owing to the confines of the site and disruption during construction works. Our client has previously set out these matters at length, and we attach a copy of this letter for your reference.
31. Whilst we acknowledge that such matters are normally dealt with separately from the substantive merits upon which the Council's determination of the application must be based, we maintain that the applicant has failed to set out appropriate or adequate measures to mitigate those impacts. This only adds to our overall concern about the development.
32. Taken as a whole, the planning balance remains overwhelmingly against approval. The Council's well-founded reasons for refusal of the previous application have not been overcome, and the proposal remains contrary to important national planning policies and adopted development plan policies for the protection of the character, quality and heritage of the local environment.
33. We urge the Council to uphold those policies and reject this latest application for the reasons stated.

Yours faithfully



Humphreys & Co.

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