

The buildings are not suitable for residential conversion due to overheating, failure to provide adequate floor to ceiling height, failure to provide adequate private outdoor space, and failure to maximise the provision of dual aspect dwellings and avoid the provision of single aspect dwellings. **Section 4 of the Sustainability Statement** states that *'the development is at risk of overheating'* and that additional cooling may be required through *'DX units with an external compound'*. The external portion of such a solution would be visible from the outside, unsightly and out of keeping with the historic, listed buildings, plus would require destruction of a portion of the listed buildings to achieve this opening, all of which would negatively impact the building's heritage value. These would be particularly apparent considering that **Appendix C of the Sustainability Statement** shows every single one of the 36 units fails the TM59 overheating standard in at least one room, many in all rooms, this represents a clear overheating issue, not a borderline one. This overheating is caused in no small part by the excessively small units for the site. Indeed, **Section 2.1.8 of the Sustainability Statement** even says that planning policy states overheating can be managed with taller ceiling heights. On a similar note, I find the argument that the ceiling height and overheating standards cannot be met *'Due to working within an existing heritage building'*, while simultaneously proposing a roof extension which increases the roof height, nonsensical. Especially considering there are currently high ceilings throughout the listed buildings and that the new extensions also fail on both ceiling height and overheating.

There is also a lack of affordable housing. The application suggests 2 units of affordable housing, representing 5.56% of the total available units. This is far below what is required for a development of this size, particularly considering the huge loss in employment/industrial floorspace. Furthermore, the only proposed affordable units are both located in the non-listed cottage. This means that there will be no provision of affordable housing in the two listed buildings that will have their heritage value most greatly harmed. I think it is therefore unfair to argue that a very small allocation of affordable housing in a currently separate site (the cottage) should justify the proposal and the harm it would cause to the heritage value of the separate Listed Buildings.

There is serious harm to the heritage value of the two listed buildings. The buildings currently have huge heritage value and significance, in addition to an incredible setting and group value. The Karslake and Ruston & Ward buildings, are both Grade II listed buildings, indicating that they are of national importance and of special interest warranting every effort to preserve them. Indeed, **Historic England's Listing Selection Guide for Infrastructure: Utilities and Communication** specifically mentions just how rare and important Waterworks buildings as old as these two are, *'Because of their rarity almost all surviving pumping houses (or stations) from before 1860 are listed'*. The two buildings at Hampton, together constitute nearly 10% of all remaining pumping houses built in the 1850s. The fact they remain together hugely increases their group value and significance.

In addition to both the Karslake and the Ruston & Ward building being Grade II listed, the Ruston & Ward building is also a designated View/Landmark location and the Victorian iron railings surrounding the buildings are also Grade II listed. The remaining buildings, the Storehouse and Cottages are both Buildings of Townscape Merit and all the buildings lie within the Hampton Village Conservation Area. The immediate surroundings are steeped in related culture and history, being comprised of several listed buildings including Hampton Library, the Morelands building, the Riverdale building and the Waterworks Gatehouse. In addition, the still operational Hampton Water Works (one of the largest waterworks in Europe, providing one third of London's drinking water) with its Victorian filter beds and of course the River Thames situated beyond them add to the group value and significance of the site. This amazing heritage in such a unique setting is not something that can be recovered once lost, and considering the significance of the site, it is of paramount importance

that it be preserved for the benefit of the public and for future generations. The proposal does not do this; instead, under the proposal, there are many instances of harm to the heritage value, including:

- a) The subdivision of the building and mezzanine floors, cause the units to fail to meet the minimum standards, as discussed above, and severely damage the character of the buildings. A key character of the buildings is one of expansive, light-filled, multi-aspect spaces. Indeed, it is a known character of Waterworks buildings, **Historic England's Listing Selection Guide for Infrastructure: Utilities and Communication** specifically states, *'Pumping stations achieved an individual 'waterworks' style, an architectural response to requirements for light and ventilation, an identity that was maintained for over a hundred years notwithstanding changes in pumping technology, including the introduction of electricity'*. Despite the obvious importance of this 'waterworks' style to the heritage value, it is being severely diminished through extreme subdivision and the insertion of mezzanine floors. Not only will the expansive spaces be lost, the mezzanine floors block huge amounts of natural light by ending partway up the beautiful, large, heritage windows, leading to a very odd appearance from both inside and outside. It is no surprise that when you subdivide historic buildings specifically known for large, open, multi-aspect spaces; into low-ceilinged, single aspect, small units, as in the proposals; these buildings, that were specifically designed for light, ventilation and space, suddenly fail to meet those exact standards. A suitable proposal would make use of the existing fabric and provide large, high-ceilinged, multi-aspect units with an abundance of natural light. This would not only solve the issues pertaining to overheating, ceiling height and dual-aspect nature, but also far better preserve the heritage value of the buildings and retain their unique 'waterworks' style.
- b) The destruction and loss of large parts of the heritage fabric of the building in two 165-year-old Victorian roofs, including the skylight and attached interior heritage trusses and their replacement with sizeable, contemporary roof extensions that use materials and architecture found nowhere else on the building and are therefore completely out of keeping. These block large parts of the existing buildings from view and greatly detract from the surrounding heritage, in addition to being excessively prominent. Additionally, the roof extension will block a significant amount of light from entering the pumphouse windows that immediately face it, in addition to blocking the light from the Victorian skylights themselves by destroying them.
- c) The rear extensions to the Karlake building would be prominent when viewed from Lower Sunbury Road (arguably the best view of the buildings and indeed the one chosen by Historic England to represent the building in its listing) and interrupts both the symmetry of the Karlake building itself, and the way in which it mirrors the Ruston & Ward building. A symmetry that is important to the heritage value as both buildings were designed and built by the same engineer, but for separate water companies.
- d) The introduction of private gardens and trees (and presumably associated fencing) blocks large swathes of the heritage building from view, greatly reducing the public's ability to view and appreciate the listed buildings.
- e) The view of the Ruston & Ward building, a designated View/Landmark location, will also be greatly damaged. Not only is the roof extension at least partially visible from 360 degrees, the addition of car parking to the North of the building will damage its appearance, block the view of the building and separate the listed railings from the listed building which share very strong group value. These issues will be exacerbated by the fact that the building and car parking are both at a higher elevation than the pavement on Upper Sunbury Road.

- f) The setting of numerous heritage assets that surround the site will be damaged. In particular, Hampton Library (Rose Hill), its gardens and the public footpath leading from it to Upper Sunbury Road. Although not part of the waterworks, Hampton Library has shared multiple links to the waterworks buildings throughout the years, particularly in the period surrounding Hampton Library's purchase by the council. The prominence of the proposed Karlake roof extension is excessive, being at eye level or slightly below and directly opposite. This would lead to the North-facing units of the proposed Karlake roof extension to suffer from serious overlooking, in addition, to destroying the current fantastic view of the heritage building and its Victorian roof (which it is proposed be destroyed). Rose Hill also has visual amenity over the Victorian filter beds and to the Thames beyond, over the Karlake building. This would be negatively impacted or lost by being blocked by the Karlake roof extension.

- g) The setting of the Morelands building, the Riverdale building and the Waterworks Gatehouse will also be damaged. These buildings were later 19th century additions to the waterworks at Hampton and obviously have incredible group value with and strong links to the Karlake and Ruston & Ward buildings. These would be very negatively affected by the proposal as not only would the views of the building be negatively affected; the change of use would separate the buildings. The waterworks site as a whole has had exclusive employment/industrial use for over 160 years. This aspect of its heritage has been embraced and continued by the owners of the Morelands and Riverdale buildings, who successfully applied to conservatively repair and convert the buildings to office and laboratory use; as such those buildings contributing positively to the local economy.

- h) The change of use proposed not only causes a planning issue in the loss of employment space, and seriously negatively affects the heritage value of the buildings which have seen constant employment use for 165 years; but residential use is one of the most restrictive in terms of public access. Any of the important internal heritage items that have not been removed and lost will be hidden away for the benefit of a single unit. These are buildings that deserve to have their incredible and beautiful heritage celebrated and displayed for all to see, not hidden away for the private benefit of a single person.

Many of the heritage compromises are simultaneously planning compromises. To claim that preservation of the heritage is a reason why planning policy and laws cannot be adhered to, when the buildings themselves are being damaged by the proposal, is disingenuous. In fact, we believe the damage proposed amounts to substantial harm being done to the significance of two Grade II Listed buildings, a building of townscape merit and Hampton Village Conservation Area; and substantial harm being done to the surrounding Listed buildings because of the damage to their setting (historic England consultations). Indeed, Historic England agreed that there was substantial harm in both their consultations and the fundamental reasons for that harm have not been addressed in this updated proposal. Considering the number of heritage assets, and particularly the number of Grade II listed heritage assets that have their significance harmed or diminished by the proposal, **Section 194 of the National Planning Policy Framework** requires that, the clear and convincing justification for this harm should be very exceptional. Quite simply, it is not. There is no justification other than private profit, let alone an exceptional, clear and convincing one. **Section 195 of the National Planning Policy Framework** restates that planning should be refused for proposals that will lead to substantial harm unless it can be demonstrated that the substantial harm is necessary to achieve substantial public benefits that outweigh that harm or loss. There is no public benefit; instead the proposal

compromises on almost every aspect where there could be benefit; from heritage loss, to accommodation standards, to a lack of affordable housing, to loss of employment floorspace, to change in class use; everything is compromised except for potential profit for the developers and owners. Logic would dictate that actually working within the existing structure, dividing the space into fewer, larger spaces which would meet residential planning requirements and which are more in keeping with the buildings and their heritage value would be more affordable as far less would have to be done to the buildings.

It is frankly ridiculous to argue that due to the buildings' high heritage value, in order to restore the buildings to a level that value merits, large swathes of said heritage value must be lost in order to fund the restoration. This proposal severely harms the heritage value of the Grade II Listed buildings it is purporting to safeguard, while simultaneously causing a huge loss of employment/industrial floorspace, failing to provide a suitable percentage of affordable homes, failing to provide enough parking, and not even meeting basic residential requirements. I therefore strongly object to the proposal.