

Built Heritage Statement

New Pavilion, Hampton Wick Royal Cricket
Club, Bushy Park

May 2024

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Our reference
AROH3001

Date
May 2024

1. Introduction

Purpose of this Report

- 1.1 This further Built Heritage Statement has been prepared by Turley Heritage on behalf of the Hampton Wick Royal Cricket Club ('the Client' and 'the Applicant'), to provide relevant and proportionate information to the local planning authority the London Borough of Richmond upon Thames (LBRuT) with regard to impacts on the significance of built heritage assets associated with the erection of a new sports pavilion ('the Proposed Development') for the Hampton Wick Royal Cricket Club, Bushy Park, Hampton Hill, Hampton, TW11 0EA ('the Site').
- 1.2 This new report follows an earlier iteration associated with a preliminary application for temporary planning permission on Site for the location of temporary changing facilities, WC's and club facilities on site following the recent fire that destroyed the pre-existing pavilion (LBRuT reference number: 24/0378/FUL). This application is currently awaiting determination by the local planning authority.
- 1.3 It is also to be noted that both these applications have been subject to a constructive process of pre-application engagement with LBRuT. Written feedback has been provided by officers (LBRuT reference number: 23/P0311/PREAPP and dated 14 February 2024), which has been used to further inform and refine the final scheme design and full application now at submission.
- 1.4 We originally identified that the Site is located within the boundary of the Bushy Park Conservation Area and also the Registered Park and Garden of the same name, which are both designated heritage assets. The Site also bounds the tall brick wall to the allotments immediately to the east that has been considered by LBRuT to form part of a statutory listed building designation (Brick Boundary Walls at Grade II). There are other designated and non-designated heritage assets within the wider surrounding area of the Site, however these other assets have again been scoped out of our assessment for the purposes of this application and proposed development on the basis of our own site survey and professional analysis.
- 1.5 This latest iteration of our Heritage Statement should be read in conjunction with the Design & Access Statement (DAS) and architectural drawings / illustrative images prepared by AROS architects, which form part of this full application submission.

Legislative and Planning Policy Context

- 1.6 The requirement for this report, derives from the Planning (Listed Buildings and Conservation Areas) Act 1990 that places a duty upon the local planning authority in determining applications for development affecting conservation areas to pay special attention to the desirability of preserving or enhancing the character or appearance of that area.¹ It is also a statutory duty to pay special regard to the desirability of the preservation of the special interest and setting of a listed building.

¹ HMSO, Planning (Listed Buildings and Conservation Areas) Act 1990.

- 1.7 The National Planning Policy Framework (NPPF) 2023 also provides the Government’s national planning policy on the conservation of the historic environment. In respect of information requirements for applications, it sets out that:

“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 ...”²

- 1.8 Paragraph 201 then sets out that local planning authorities should also identify and assess the particular significance of heritage assets that may be affected by proposals. They should take this assessment into account when considering the impact of proposals in order to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal.

Contents of this Report

- 1.9 In accordance with these above legislative and policy requirements, **Section 2** of this report firstly identifies the relevant built heritage assets that would likely be affected by the development proposals on Site. To establish a shared understanding of the historic context of the Site, **Section 3** then provides a description of the special interest of the Bushy Park Conservation Area, in terms of its historical development and also character and appearance, consistent with relevant best practice advice / guidance³, including the contribution made by the Site to its overall heritage significance in these terms. A proportionate statement of heritage significance (and setting) is also provided for the Registered Park and Garden (Bushy Park) and the nearby listed Brick Boundary Walls in relation to the Site and also the nature and extent of the proposed development.
- 1.10 **Section 4** describes the application proposals for the new replacement pavilion for the club following the catastrophic fire, and assesses the heritage impacts of this final scheme design and approach. This is undertaken in light of our assessment of the significance of the identified designated heritage assets, as well in compliance with the relevant heritage legislation and national and local planning policy context regarding use and development within the historic environment.
- 1.11 **Section 5** provides a short summary and also the conclusions of the findings of this report in terms of heritage impact assessment.
- 1.12 For completeness and ease of reference, a map of the Bushy Park Conservation Area boundary (provided by the LBRuT) is included at **Appendix 1**. The published List / Register Entry for the registered landscape at Bushy Park (from Historic England) is also included for reference and in full; at **Appendix 2**.

² MHCLG, National Planning Policy Framework (NPPF) 2023 – paragraph 200

³ Historic England: Advice Note 12: Statements of Heritage Significance 2019

- 1.13 **Appendix 3** also provides a full review of relevant legislative and planning policy and guidance context for this application scheme, again for completeness.
- 1.14 It is to be noted that assessment of the archaeological resource or below ground heritage assets falls outside the remit of this report.

2. Heritage Assets

Introduction

2.1 The NPPF 2023 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.”⁴

2.2 The following heritage assets have been scoped in as relevant to our contextual analysis in this section and for the purpose of impact assessment. This has been based on an initial review of existing published information, focussed desktop and archival research by our team, and also site survey work. In addition, the relevant Historic Environment Record (HER) for this local planning authority area has been consulted.

Designated Heritage Assets

2.3 Designated heritage assets are those which possess a level of heritage interest that justifies designation and are then subject to particular procedures in planning decisions that involve them. The NPPF further defines designated heritage assets as:

“A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.”⁵

Conservation Area

2.4 The Site falls within the boundary of the **Bushy Park Conservation Area**. This conservation area was first designated on 29 January 1991 by the LBRuT. A map of the current conservation area boundary is included at **Appendix 1**. The LBRuT has published the Bushy Park Conservation Area 61 Statement (undated), but no other more detailed Character Appraisal or Management Plan documents. The proposed development would have a direct impact on the significance of this heritage asset through change to a part of its character and appearance, including views within the surrounding historic landscape.

Registered Park and Garden

2.5 The Site also falls within the boundary of the **Bushy Park Registered Park and Garden**, which was first included on the register of parks and gardens of special historic interest at the highest Grade I on 30 September October 1987. The HE published List / Register Entry is included in full at **Appendix 2**. The proposed development would have a direct impact on the significance of this heritage asset through change to a part of its character and appearance.

Listed Buildings

2.6 There are a number of statutory listed buildings (or structures) of special architectural or historic interest within the local and wider surrounding area of the Site. These are

⁴ MHCLG, National Planning Policy Framework (NPPF) 2023 - Annex 2: Glossary

⁵ MHCLG, National Planning Policy Framework (NPPF) 2023 - Annex 2: Glossary

identified on the Historic England (HE) National Heritage List for England, and include a number of list entries relating the **Brick Boundary Walls** enclosing the parkland of Bushy Park (at Grade II and for group value). Principally these boundary walls follow the perimeter of the park and surrounding roads, however the LBRuT Local Plan 2018 Proposals Map (Figure 2.1) specifically identifies that the continuous wall that divides the Site from the allotments (Church Grove) to the east and also King's Field to the south within the park forms part of that listing designation. This section of wall likely forms part of the designation (by virtue of attachment and or curtilage) of two listed buildings dating from 24 June 1983 (along Hampton Court Road to the south and Church Grove / Sandy Lane to the east / north). Accordingly, the proposed development has the potential to indirect effect the significance of this heritage asset through change to a part of its setting, and is scoped in for assessment.

- 2.7 Other listed buildings within the wider area have also been identified, which include the Monument to Timothy Bennet at corner of Sandy Lane with Park Road (at Grade II) and also the nearby The Thatched Lodge (also Grade II) which are both located to the north of the Site and outside (not inside) the brick boundary wall of Bushy Park. Other listed buildings are located further to the east within the settlement of Hampton Wick, and beyond the allotments, parkland boundary wall and Church Grove. It is our assessment that due to the nature and extent of the proposed use and development, local topography, distance from the Site and the screening or otherwise filtering effects of the parkland boundary wall, other built elements and or mature vegetation on intervisibility, that the significance of these other designated heritage assets would not be affected by the application scheme. As such, all other listed buildings are not considered further within this report.

Non-Designated Heritage Assets

- 2.8 The NPPF⁶ identifies that heritage assets include both designated heritage assets and assets identified by the local planning authority (including local listing). The LBRuT maintains its own register of unlisted buildings of local architectural or historic interest or "Local List", which is in addition to the identification of "Buildings of Townscape Merit" (BTM)⁷. Both these local identifications are to be is considered to be non-designated heritage assets for the purposes of planning policy.

Local List and or BTM

- 2.9 The LBRuT Local Plan 2018 Proposals Map identifies a number of locally listed buildings within the wider surrounding area of the Site, which include Rose Cottage to the south and beyond King's Field and then further to the north Nos.5-11 Sandy Lane to the edge of the park. Other locally listed buildings are located further to the east within Hampton Wick. However, it is our assessment that due to the nature and extent of the proposed use and development, local topography, distance from the Site and the screening or otherwise filtering effects of the parkland boundary wall, other built elements and or mature vegetation on intervisibility, that the local significance of these other non-designated heritage assets would not be affected by the application scheme, and so scoped out.

⁶ DCLG, National Planning Policy Framework (NPPF) 2019 - Annex 2: Glossary

⁷ https://www.richmond.gov.uk/locally_listed_buildings

Heritage Assets Plan

2.10 The following plan at **Figure 2.1** identifies the relevant designated and non-designated heritage assets within the Site and or its local / wider surrounding area. This is an extract from the LBRuT Local Plan 2018 Proposals Map. Principally these heritage assets including the Bushy Park Conservation Area (purple boundary line) and Registered Park and Garden (crenelated green boundary line). Listed buildings and structures are indicated by a pink line or outline and hatch, whereas locally listed building have a red outline with checkerboard pattern.



Figure 2.1: Extract from LBRuT Local Plan 2018 Proposals Map – approximate area of the Site identified by red line

3. Heritage Significance and Setting

Introduction

3.1 The NPPF defines the significance of a heritage asset as:

“The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.”⁸

3.2 Historic England has published general guidance with regard to the preparation of statements of heritage significance, and how the proper analysis of the significance of heritage assets should be used to inform an assessment of impacts on that significance as a result of proposed change / applications.⁹

3.3 The NPPF also defines the setting of a heritage asset 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. 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.”¹⁰

3.4 Historic England has published good practice advice in respect of the setting of heritage assets¹¹, providing detail on understanding and experiencing setting and the associated assessment of the impact of any changes within it. Historic England has also provided further guidance in the past for their staff (and others) on their approach to making decisions and offering guidance about all aspects of England’s historic environment.¹² This provides advice on how to assess the contribution of elements of a heritage asset, or within its setting, to its significance in terms of its “heritage values”. These include: evidential, historical, aesthetic and communal. This supplements the established definitions of heritage significance and special interest set out in founding legislation and more recent national planning policy and guidance / advice.

Conservation Areas

3.5 Conservation areas are designated if they are of special architectural or historic interest, the character and appearance of which it is desirable to preserve or enhance.¹³ Historic England has published guidance in respect of conservation areas. This document provides a framework for the appraisal and assessment of the special interest and significance of a conservation area. It also provides advice on how to identify elements of the conservation area that make a contribution to the character and appearance.¹⁴

⁸ MHCLG, National Planning Policy Framework (NPPF) 2023 – Annex 2: Glossary

⁹ Historic England: Advice Note 12: Statements of Heritage Significance 2019

¹⁰ MHCLG, National Planning Policy Framework (NPPF) 2023 – Annex 2: Glossary

¹¹ Historic England, Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets 2019 (2nd Edition)

¹² English Heritage (now Historic England) Conservation Principles: Policies and Guidance 2008

¹³ HMSO, Planning (Listed Buildings and Conservation Areas) Act, 1990 – Section 69(1) (a).

¹⁴ Historic England, Advice Note 1: Conservation Area Appraisal, Designation and Management, 2019 (2nd Edition).

Registered Park and Gardens

3.6 Inclusion on the register of parks and gardens of historic interest does not confer any additional statutory protection. It is however, a material consideration in the determination of applications for development. The register identifies designed landscapes which are considered to meet published criteria and possess special historic interest, which is supported by Historic England's Registered Parks and Gardens Selection Guides for each specific landscape type.¹⁵

Listed Buildings

3.7 Listed buildings are defined as designated heritage assets that hold special architectural or historic interest. The principles of selection for listed buildings are published by the Department of Culture Media and Sport¹⁶ and supported by Historic England's Listing Selection Guides for each building type¹⁷.

Assessment

3.8 The following section provides a proportionate statement of heritage significance for each of the identified built heritage assets relating to the Site; the significance of which would likely be affected by the proposed development. This includes an assessment of the Site's contribution (if any) to that significance as an element within a designated area and or the setting of an asset. Assessment is undertaken on the basis of published information, targeted historical research and on-site visual survey and analysis. This assessment is proportionate to the importance of the identified heritage asset, nature and extent of the proposals, and therefore sufficient to inform the decision-making process.

Bushy Park Conservation Area

Introduction

3.9 The Bushy Park Conservation Area comprises the historic enclosed parkland of this Royal Park, which is a defined landscape area situated to the north of the riverside Hampton Court Palace and its Home Park and green, to the west of the settlement of Hampton Wick (and Kingston across the River Thames), to the south of Teddington and to the east of Hampton / Hampton Hill. It adjoins a number of other conservation areas to the west, east and south within the local authority area of the LBRuT. There is no published Character Appraisal for this conservation area, although the short Bushy Park Conservation Area 61 Statement (and Boundary Map) has been prepared by LBRuT, and also a much more comprehensive Management Plan (BPMP) published by The Royal Parks in draft in March 2014 that includes much on the history of the park, the character and appearance of the landscape and its buildings and structures as relevant.

Historical Development

3.10 Bushy Park was enclosed by Henry VIII in 1537 for the purposes of deer coursing. It was partly remodelled in the late 17th and early 18th centuries as enclosed parkland and designed gardens relating to the key buildings of Upper Lodge and Bushy House. It was only in the early 20th century that the park gained full public access and diversified /

¹⁵ Historic England, Registered Parks and Gardens Selection Guides (suite of documents) 2012 (updated)

¹⁶ DCMS, Principles of Selection for Listing Buildings 2018

¹⁷ Historic England, Listing Designation Selection Guides (All Building Types) 2018 (updated)

fragmented to some degree with the introduction of new visitor amenities and sporting / recreational facilities. The Site itself forms part of that later history. The historical development of the park is extensively described in the 2014 Bushy Park Management Plan that is not repeated here.

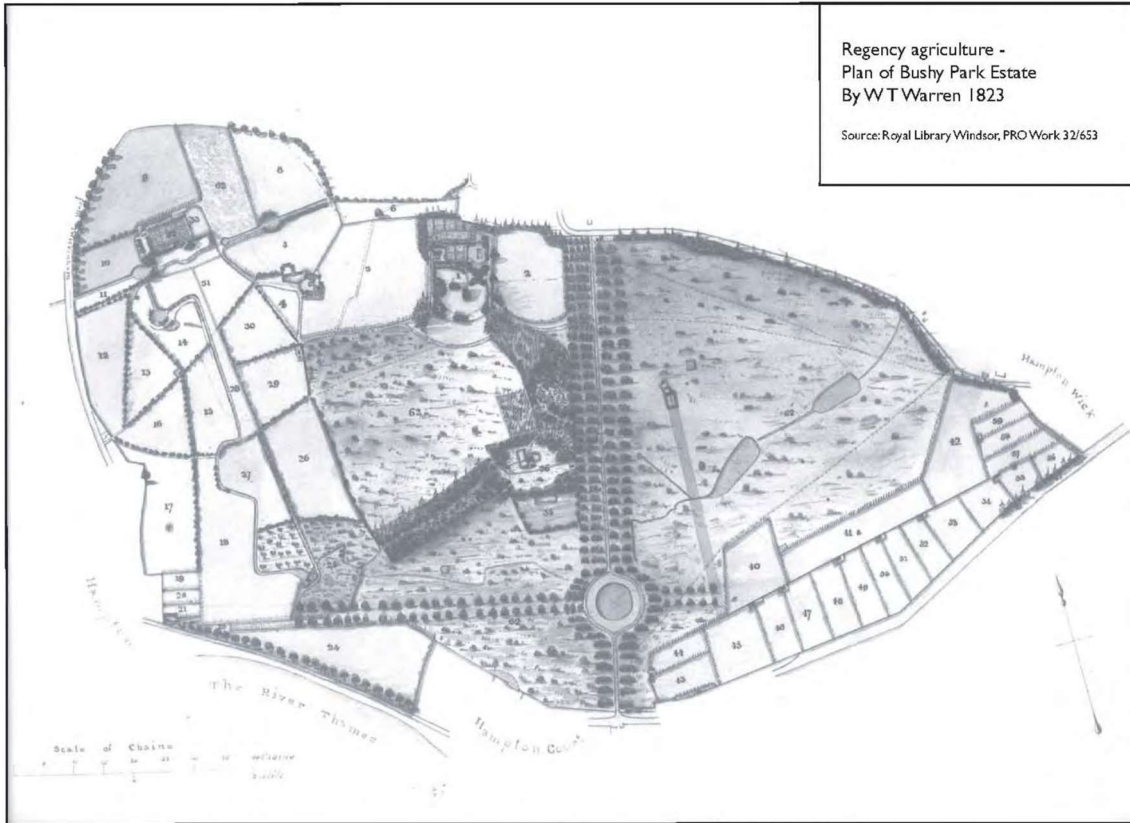


Figure 3.1: Plan of Bushy Park Estate, Warren 1823 (BPMP 2014)

Character and Appearance

3.11 The Bushy Park Conservation Area 61 Statement (undated) summarises the key features that define the character of this historic landscape. This states:

“The conservation area consists of 44 hectares of well cared for historic parkland. It is listed as Grade I on English Heritage’s Register of Historic Parks and Gardens, and contains an ancient monument (the Brew House c1710) the Longford River is of recognised archaeological importance. The park contains the Royal Paddocks. One of the main landscape features is Chestnut Avenue created by George London in 1698 under William III. The Diana Fountain was moved there by Queen Anne in 1701.

Its topography and historical importance combine to create its unique character. The grandeur of its open scale and formal avenues of mature trees reflect the park’s other function in forming the setting and approach to Hampton Court Palace. Otherwise open parkland is interspersed with interesting water features, such as the Diana Basin and Longford River, planned minor avenues of trees and woodland enclosures.

Views are an integral part of this landscape, often terminating in important buildings both inside and outside Bushy Park. The north/south and east/west vistas are identified

in the UDP but other views are also important in terms of the setting of listed buildings in the park. The existence of trees beyond the boundary of the Park is important in contributing to a sense of the landscape continuing beyond its well-defined and historic boundaries. Trees are also important in screening wartime Ministry of Defence buildings.

The listed buildings in the Park belong to the 18th century and play an important role in contributing to its character as an historic park. Bushy House, built in the reign of George II, and Upper Lodge both retain vestiges of their former settings while the 18th century buildings along the southern boundary reflect historical development and provide a sense of enclosure, reinforced by the listed 16th century walls which provide a clear definition to the conservation area itself.



Figure 3.2: Photograph of Hare Warren from the local area of the Site looking west into and across Bushy Park

- 3.12 The Bushy Park Management Plan describes that the flat topography of the park is exploited in the dramatic long views along the Chestnut and Lime Avenues and also forms the basis of the fundamental character of the park as expansive, level or subtly undulating open grassland. However, the flat landform also means that unshielded views of buildings even of modest height outside the walls can be intrusive and the boundary tree planting is crucial in maintaining a sense of enclosure. The Management Plan also describes in further detail the landscape character of the park, and also its relationship with views into, out from and also within the park. Views are described in general terms as “structural views” that are formed by the main avenues, open parkland views to specific reference points (such as Bushy House and Hampton Court

House), and then general and typical views across open parkland (including identified Representative Views / Viewpoints) (Figure 3.2).

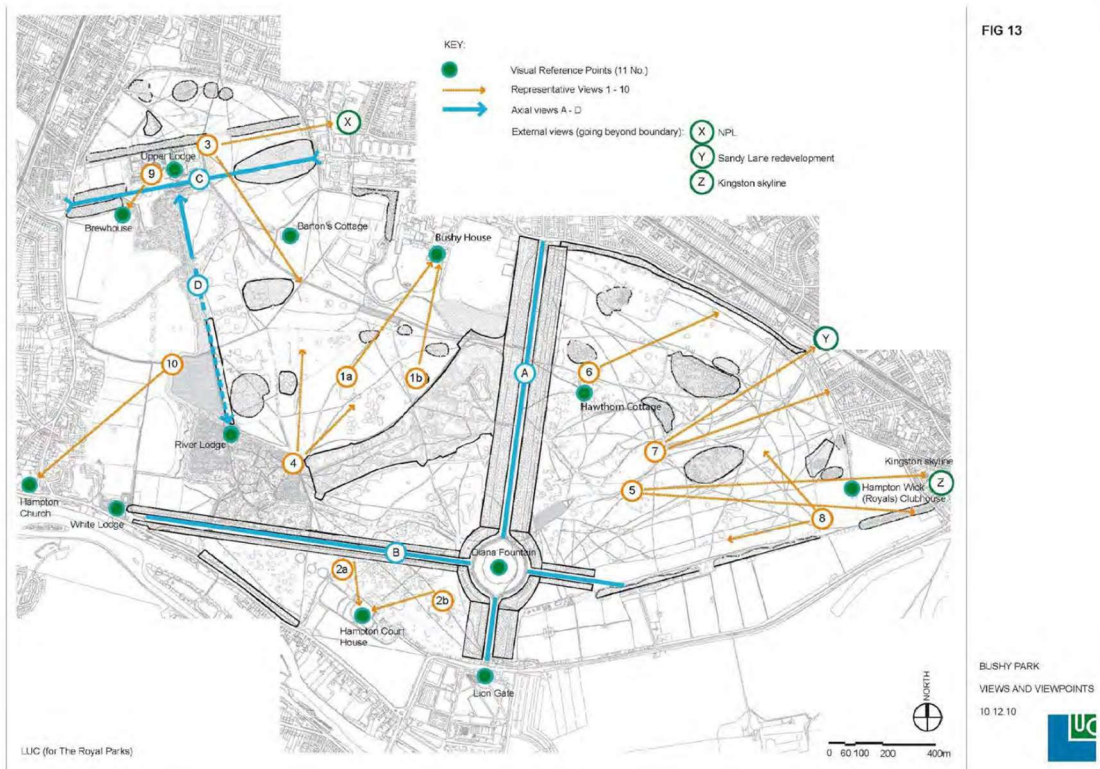


Figure 3.3: Views (BPMP 2014)

3.13 The Management Plan also describes the character of the landscape through the definition of character areas. The Site itself is included within “Area 2 Hare Warren” that is described as the area of most of the easterly of the three original Tudor Parks. This sub-area is bounded by Chestnut Avenue to the west, the Royal Paddocks to the south and the brick boundary walls to the north and east. It is also described that:

“Although still largely retaining its open, parkland character, Hare Warren has been modified by additions ranging from the 17th century Heron and Leg of Mutton Ponds, to major 19th century plantations (Warren, Oval, Half Moon) and smaller 20th century ones, to the site of the World War II SHAEF camp and the visitor facilities of playground, boating pond and Diana Car park.

The largest open parkland area in Bushy, Hare Warren is a flat landscape of acid grass land and bracken (with the latter relatively dominant) punctuated by mature parkland trees and clumps, giving long views towards boundaries. The mature oak plantations are important landmarks contrasting with the bracken and grassland form, colour and texture. Individual and small groups of thorn trees are also prominent but have been much weakened by age and losses, and more recently supplemented by planting within the HLF project. It is also significant for ground nesting birds.”



Figure 3.4: Photograph of Representative View 5 (see Figure 3.3) looking east towards the Site and Kingston skyline in the distance beyond from a vantage point at the southern edge of Heron Pond

- 3.14 At the eastern extremity of Hare Warren is the separately enclosed Hampton Wick Allotment Association that is operated under Royal Warrant and also forms the east boundary (brick wall) of the Site. To the north of the Site (Hampton Wick Royal Cricket Club cricket ground) is the more recently planted Millenium Wood that provided a high degree of screening within the park, to the west the extensive open grassland and skylark nesting area, and to the south / south east the route of Church Grove Passage as a key access from Hampton Wick, and then the recreation area of the King's Field further to the south within its boundary wall. Where mature trees and other vegetation allows there is the opportunity for some longer and wider views looking outwards and east of the built form of Hampton Wick settlement and also the skyline of Kingston town centre beyond the wall.

Contribution of the Site to Significance

- 3.15 The Site and the Hampton Wick Royal Cricket and Hockey Club ground is situated adjacent to the allotments at the eastern side of Bushy Park close to Hampton Wick and the gate from Church Grove. It is the oldest of the sports clubs within the park; having been founded in 1863 by Rev. Frederick de Crespigny the local vicar on this site and after agreement to its use by the Crown Commissioners¹⁸. **Figure 3.5** is an image of the then new Pavilion that was opened on Site in 1902. This structure no longer exists; having burnt down in 1988 and then replaced by a new pavilion in 1990 after

¹⁸ <https://www.fhw1.org.uk/friends/images-in-album.php?s=the-history-of-hampton-wick-royal-cricket-club>

successful fundraising and the use of temporary accommodation here. As found today, the pavilion has again been lost following destruction caused by an arson attack on 7 September 2023. The Site is now temporarily fenced off for safety reasons.



Figure 3.5: Photograph of the Opening of the New Pavilion for the Hampton Wick Royal Cricket Club on 26 April 1902¹⁹

3.16 The extract of the 1894 Ordnance Survey (OS) map of this part of Bushy Park at **Figure 3.6** shows the cricket club – both pavilion and recreation / sports ground – at this time. A later aerial photograph of the Site and local area of the park and riverside settlement dating from 1927 provides further detail on location and appearance of the club’s grounds historically (**Figure 3.7**).



Figure 3.6: Extract from Ordnance Survey (OS) map published 1894

¹⁹ Friends of Hampton Wick Library



Figure 3.7: Aerial photograph towards the Site, over Kingston Bridge towards Bushy Park dated 1927²⁰



Figure 3.8: Photograph of the Site and Hampton Wick Royal Cricket Club looking east from within Bushy Park towards Hampton Wick and Kingston to the background / skyline (as found today)

²⁰ Historic England Aerofilms Collection

- 3.17 The site and use of the cricket ground contributes positively to the heritage significance - character and appearance - of the Bushy Park Conservation Area through its local historic interest associated with the provision of sports and recreation since the late 19th and into the 20th century within the park. This contribution also derives from activity and animation that the use of these facilities makes to the positive and wider enjoyment and appreciation of this historic landscape as found today. The open green character of the ground itself relates to the wider character of the landscape, in particular the sports grounds and play space of King's Fields to the south and the allotments over the wall immediately to the east, albeit much more formalised in its layout, use and maintenance compared to the wider surrounding parkland and woodland areas to the west.
- 3.18 Prior to the arson attack the modern pavilion building would have been relatively prominent in views from within this part of the park, and adopted a relatively traditional architectural style and use of materials typical of the sports pavilion building type. At that time this building would have been seen addressing the grounds when looking east and against the adjoining allotment brick boundary wall and also the wider backdrop and skyline of the built development of Hampton Wick and Kingston over the river beyond the enclosed area of Bushy Park. Any contribution to the character of the park and these views has been lost since its destruction. The associated hardstanding areas (including car parking accessed from the north entrance route from Sandy Lane) and other structures such as storage shed and low fencing to the grounds (which survive) are also modern and make no particular contribution to the character or appearance of this area. The existing temporarily fenced-off ruin of the pavilion and damage to the grounds following the fire is a detracting feature as found today.

Bushy Park Registered Park and Garden (Grade I)

Introduction

- 3.19 The designated area of Bushy Park Registered Park and Garden of Historic Interest effectively follows the boundaries of that of the Bushy Park Conservation Area. Again this other heritage asset is defined by the clearly defined historic enclosed parkland of this Royal Park (now public park and recreation area).

Historic Interest

- 3.20 The Register Entry²¹ for Bushy Park was first issued in 1987 and provides a detailed description of the historical development, location, area, boundaries, landform, setting, entrances and approaches, views, park and structures of this landscape, which is appended but not repeated here. The Grade I designation indicates an historic landscape of particular or exceptional importance in the national context. The Register Entry identifies this landscape as:

“A royal deer park with C15 origins enlarged by subsequent monarchs and improved by, among others, George London and Henry Wise.”

²¹ Historic England, The National Heritage List for England – included at Appendix 2



Figure 3.9: Photograph of Heron Pond within the character area of Hare Warren and Bushy Park

- 3.21 Helpfully the 2014 Management Plan provides a Statement of Significance for this historic landscape, which in terms of history and heritage describes that:

“The tradition of the enclosed deer park is unique to Britain. Bushy Park is a remarkable example of this form of land management, providing also an extensive tract of relict rural landscape containing visible evidence of human activity over some 6000 years, encapsulated within greater London. The national significance of this landscape is evident in its designation as a Grade I historic landscape on English Heritage’s Register of Parks and Gardens of Special Historic Interest. In addition, the Park contains a number of listed buildings and artefacts, and a Scheduled Ancient Monument. The scale, extent and range of features in its surface archaeology are remarkable and of great significance (to date 13 features are included on the Heritage List- see appendix 2).”

Contribution of Site to Significance

- 3.22 The history and character of the Site within the context of Bushy Park and the nearby settlement of Hampton Wick has already been described in relation to the overlapping heritage designation of the Bushy Park Conservation Area in this Section of the report.
- 3.23 Again, it is our assessment that the Site contributes positively to the heritage significance (i.e. historic interest) of this registered landscape principally through its local historic association with a cricket club founded in the later 19th century in this very site, which has remained in this use since that time. The open green character of the ground itself again relates positively to the wider character of the landscape of the

park; including both historic elements of former parkland and also more modern sports and recreation additions from the earlier 20th century onwards.

- 3.24 The existing temporarily fenced-off ruin of the now burnt-out modern pavilion building to the eastern edge of the playing grounds is a detracting feature in local views within the park as found today. The associated hardstanding areas and other ancillary structures belonging to the club are all modern and make no particular contribution to the interest of the historic landscape.

Listed Building: Brick Boundary Walls (Grade II GV)

Introduction

- 3.25 There are five separate List Entries²² identified on HE's National Heritage List for England since 1983 relating to the brick boundary walls that enclose the parkland of Bushy Park, and which area all included at Grade II and for group value. It is the LBRuT Local Plan 2018 Proposals Map that specifically identifies that that stretch of wall between the Site and Church Grove Allotments for part of that listing designation (presumably by virtue of attachment and or curtilage). The Site forms part of the local setting of this listed structure.

Special Architectural and Historic Interest

- 3.26 The 2014 Management Plan for Bushy Park provides a description of the history and character of the boundary wall and also other associated structures. This sets out that:

"The Historical Survey (Travers Morgan 1981) shows that the wall is of mixed age spanning a period of some 460 years. Henry VIII had several miles of less elaborate wall built from the north west corner of Hampton Court Green along the north side of Hampton Court Road to Hampton Wick and much of this section remains today. Surviving lengths of wall also remain from Stuart and Georgian times. The Park's enclosure by a wall was completed in Victorian times. Throughout this time the wall has been progressively renewed and replaced. Consequently, the appearance of the wall varies greatly along its length ..."

- 3.27 These brick boundary walls are of both architectural and historic interest through their close association with the founding and later evolution of Bushy Park from an enclosed hunting ground and Royal parkland to a landscape for public leisure and recreation in the more modern period, and also through their physical presence, form and materiality providing that clear definition and enclosure to this historic landscape area.

Contribution of Site to Setting

- 3.28 That part of the listed brick boundary walls between the Site (HWRCC) and the allotments does not form part of the perimeter enclosure to the park, but has a more secondary role dividing these existing more modern uses within the eastern area of this landscape. The boundary which this wall defines does not appear in full on the early (1823) Warren Plan of Bushy Park Estate, and does not appear to form part of the Earl of Halifax's wall built in the mid 18th century to this edge of the park. Although it maintains the consistent c.7 feet height and mix of brown and stock brick and traditional bonding pattern of other stretches of the perimeter wall, this section is

²² <https://historicengland.org.uk/listing/the-list/map-search?clearresults=True>

likely to date from in part the later 19th century; alongside substantial later 20th century rebuilding.

- 3.29 As found today, the use and character of the Site itself as a cricket ground contributes little, if anything, to our understanding or appreciation of the heritage significance of the listed brick boundary wall, other than in defining this use from the allotments immediately to the east.



Figure 3.10: Photograph of the Site and burnt-out pavilion building as seen from the south (Church Grove path) and with the high brick boundary wall to the neighbouring allotments visible to the right

4. Application Proposals and Heritage Impact Assessment

Introduction

- 4.1 In accordance with the requirements of the NPPF 2023, the significance of the identified relevant designated heritage assets have been proportionately described in **Sections 2-3** of this report. Which has been based on a review of published sources, desktop archival research and also site visit and analysis by our team.
- 4.2 The relevant heritage legislative, planning policy and guidance context is also set out in full at **Appendix 3**, which includes the statutory duties of the Planning (Listed Buildings and Conservation Areas) Act 1990, national policy set out in the NPPF and supported by the NPPG, and the Local Development as relates to change within the historic environment.
- 4.3 Together, these sections and appendices provide the appropriate context for consideration of the application proposals, and heritage impacts, by the local planning authority.

Relevant Planning History and Pre-Application Engagement

- 4.4 A preliminary application for temporary planning permission on Site for the location of temporary changing facilities, WC's and club facilities on site following the recent fire that destroyed the pre-existing pavilion has been submitted, and also now validated (LBRuT reference number: 24/0378/FUL). This application is currently awaiting determination by the local planning authority.
- 4.5 Importantly, this scheme has been subject to a constructive process of pre-application engagement with LBRuT. Written feedback has been provided by officers (LBRuT reference number: 23/P0311/PREAPP and dated 14 February 2024), which has been used to further inform and refine the final scheme design and full application now at submission stage.
- 4.6 With regard to matters of design, local character and impact on heritage assets (page 7), written feedback advice set out that:

“The proposed pavilion would not replicate the previous pavilion, but alter the massing and form, with a set of four gables resting on the base with an inset porch at the front. The overall scale of the pavilion would not be significantly greater than the previous. The proposed design is a blend of traditional and contemporary influences which is thought to be an acceptable approach. For instance, the gables at first floor reference historical cricket pavilions cited in the submission. It is noted that none of these are site specific design references. However, in massing, fenestration and materials the pavilion would be contemporary. Teddington Cricket Club Pavilion, also in Bushy Park, has been cited which is an asymmetrical modern design with timber cladding and larger areas of glazing ...”

- 4.7 This feedback acknowledges that the overall scale of the new pavilion would not be substantially greater than that pre-existing, and also that the architectural approach would be acceptable for this building type and location. The letter further set out that:

“The proposed gables lined up in a row would make for an eye-catching feature but would also make the pavilion quite prominent. Given the sensitive setting in Bushy Park, it is worth considering whether other roof forms may sit more quietly in the landscape. It is also worth considering whether the historical form of the pavilion with gable and scoreboard could be incorporated into the design ...”

- 4.8 In response, the DAS describes how the architectural approach for the new pavilion has been further considered and also refined prior to application. It is considered that the gabled roof form remains the best approach in terms of creating a new building of quality, visual interest and also distinctiveness for the club, and which also accords with the character of other established examples of this particular building type. It would also sit comfortably within the envelope of the modern building which it would replace; both lower in maximum height and reduced in bulk and massing at upper level, and not appear overly prominent within local views. The opportunity has also been taken to incorporate the scoreboard within the form of the upper terrace. The letter further set out that:

“In terms of materials, it is thought that natural timber cladding to the exterior would be suitable for the context and similar to the Teddington Cricket Club Pavilion. An option shown in the submission with black and white external walls to the pavilion would not be supported on account of the visual incongruity with the context. It is thought that the different sections of timber cladding, such as vertical stripes and shingles, would be positive features which help give variety and texture to the building. Other materials such as metal roofing would be acceptable, provided they were in muted, natural colours. Consideration should also be given as to how all the materials would weather over time. For instance, the perimeter of the proposed upper terrace appears to have glass railings. It is thought that these may not weather well in the long term. The choice of railings would have a significant impact on the overall appearance of the building from ground level in both short and longer views ...”

- 4.9 In response, the application DAS and other supporting design information provides further detail on the materiality of the scheme; following these recommendations, such as the use of vertical timber boarding, seemed metal cladding to the roof and a calmer colour palette. A key revision is to now adopt a simpler metal railing balustrade to the first floor terrace rather than glass. The letter also sets out that:

“Finally, as noted above, any landscaping proposals would be an important part of the setting of the building and should be considered simultaneously with the built form.”

- 4.10 Again, the full application design material now provides further information on the integrated hard and soft landscaping proposed as part of this scheme.

Application Scheme

- 4.11 The Proposed Development for the purposes of this application for planning permission on Site is described as:

“The construction of a new pavilion for Hampton Wick Royal CC following a catastrophic fire which destroyed the previous building.”

- 4.12 The full application submission material should be read in conjunction with this latest Built Heritage Statement report. This includes the Design & Access Statement (DAS) and architectural drawings / illustrative images prepared by AROS architects (including a selection of computer generated images (CGI) including for example **Figure 4.1** below).



Figure 4.1: CGI of Main Entrance view (AROS)

Assessment of Impacts

Bushy Park Conservation Area

- 4.13 We have established that the use of the Site (and also its long history) for sports and recreation contributes positively to the heritage significance of the Bushy Park Conservation Area. These development proposals are intended to provide permanent replacement facilities for this sports club following the arson attack that destroyed their pre-existing pavilion in 2023; in order to sustain this historic use and its contribution to the character and appearance of the conservation area. In this way these proposals would both sustain and also enhance the significance of the conservation area in supporting the continuation of that historic use for this site associated with the Royal Hampton Wick Cricket Club (established 1863).
- 4.14 The open green character of the formal sports ground itself is also a positive feature of this part of the conservation area, which relates to the wider character of the historic landscape, and which would be maintained in that use and unchanged by these proposals. The replacement pavilion would again face out onto the playing ground to

benefit both users and spectators. The existing temporarily fenced-off ruin of the modern pavilion is now a detracting feature in local views, but which would be cleared away as part of this scheme for its replacement. The associated hardstanding areas and other ancillary structures related to the sports use of the Site are also modern, but neutral contributors. These elements would either be removed or retained and reused as part of a new landscape scheme design for the immediate setting of the new pavilion.

- 4.15 The proposed new pavilion will include improved facilities for the sports club, including four changing rooms (with separate facilities for female players and guests), a club room / social space at its heart, with a bar and other catering facilities, secure storage areas (located to the more discreet rear area), and facilities for officials. Overall the scale, form and design of this new replacement building has been determined not only by the pre-existing pavilion and current English Cricket Board (ECB) guidelines for these sports, but also by the current aspirations of the club to continue to evolve and improve, including creating a more accessible, inclusive and sustainable building at a high quality of architecture.
- 4.16 The replacement pavilion would occupy the same location and also a similar footprint to the pre-existing building between the eastern edge of the playing ground and the boundary wall to the allotments nearby. This would be a two storey structure that would present a new shape and form relative to that which came before, but which would in overall terms represent a similar height, scale and massing. In this way the new building would have no new or further impacts on the adjoining boundary wall, nearby trees or the extent of surrounding open space. The new design of this pavilion would take the opportunity to improve on the architectural quality of that pre-existing in a contemporary manner, albeit still clearly reflective of the traditional characteristic features of the sports buildings of this type and location.
- 4.17 This appropriate approach is reflected in the openness of its western elevation to the playing area, the new incorporation of a first floor viewing terrace to this side, traditional pitched roof forms with deep sheltering eaves, and use of robust timber cladding (albeit in various ways to provide added interest). Existing access and arrival from the north for both pedestrians and vehicles from the north would be improved, and also its key outlook over the ground (and further out across Bushy Park) to the west optimised for both floor levels.
- 4.18 The replacement pavilion would be visible within the park in both local and some longer distance views from the west, albeit this Site is much more visually contained within the larger extent of Bushy Park by the existing mature vegetation / woodland to the north of the Site, the allotment boundary wall immediately to its east, and the boundary treatment and vegetation to the south along the edge of nearby King's Fields. The proposed new building would (and as was for that pre-existing pavilion) relate appropriately to the established sports use of the Site and also the key characteristics of other historic and or modern recreational buildings / structures within comparable public parks or other such open spaces.
- 4.19 The proposals are comparable in overall scale to that pre-existing, albeit lower in maximum height, and also would adopt a more refined and attractive form and quality

detailed design / materiality. Within surrounding views the replacement building would not have any significantly greater visual impact, would again sit comfortably within its wider landscape setting, and would also take opportunities to add further positive interest and variety to these views through its architectural quality. The integration of new building and its proposed immediate hard and soft landscape design forms a further positive aspect of these proposals.

- 4.20 The replacement pavilion would have no greater or significant effects on the quality or character of longer distance views looking east from within Bushy Park towards Hampton Wick relative to that pre-existing on Site. This would include Representative View 5 identified in the Bushy Park Management Plan (BPMP) 2014. The visual prominence of the roofscape and bell turret of St John's Church on Church Grove as part of the wider built backdrop to these views would not be diminished, and the visual presence and variety of the townscape of both this nearby settlement and the skyline of Kingston town across the river would remain appreciable beyond the boundary walls of this part of Bushy Park.
- 4.21 Overall these proposals would not detract in any way from the current appreciation of the defining characteristics of the historic landscape of this much more expansive parkland or the character and appearance of the conservation area. The significance of this designated heritage asset would be sustained, and to a degree enhanced, by these proposals.

Bushy Park Registered Park and Garden

- 4.22 Again, these proposals for a new pavilion would sustain this historic use and its positive contribution to the heritage interest of the registered park and garden as a benefit. The replacement positioning of the replacement building to the edge of the playing ground and along the allotment wall, its comparable footprint and overall scale and massing, and also improved architectural and landscape design quality, would ensure that these proposals would not detract from the current appreciation of the history or character of this landscape. Overall, the significance of this other heritage asset would be sustained, and also to a degree enhanced, by these proposals.

Listed Building: Brick Boundary Walls

- 4.23 The proposed replacement building on Site would have no new or further physical impact on the fabric of the nearby listed brick boundary wall within this part of Bushy Park relative to that pre-existing. The well-considered scale, form and design of the new pavilion would avoid any detracting effects on the current role and visual appreciation of the wall as an historic boundary between the allotments and the more expansive parkland to the west. The significance of this heritage asset would therefore be sustained.

Compliance with Heritage Legislation and Planning Policy

The Planning (Listed Buildings and Conservation Area) Act 1990

- 4.24 It is our assessment that the application proposals for a new replacement sports pavilion to sustain this historic use on Site would comply with the relevant statutory duty of the 1990 Act that requires special attention to be paid to the desirability of preserving or enhancing the character or appearance of a conservation area (i.e. Bushy Park). These proposals would also comply with the relevant statutory duty of the Act in

relation to listed buildings; where the special interest and setting of the nearby brick boundary walls would not be harmed but preserved.

NPPF 2023 (and NPPG)

- 4.25 In accordance with the requirements of paragraphs 200-201 of the NPPF, the significance of the identified relevant heritage assets have been described proportionately in **Sections 2-3** of this report and for the purposes of this application.
- 4.26 In assessing these proposals, we have taken account of the key principles set out in paragraph 203, which encourages the desirability of sustaining and also enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation. It is demonstrated that these proposals are required to sustain the historic sports use of this part of the park and the associated replacement structures have also have been well situated and designed to a high quality in order to avoid any adverse effects on the understanding and appreciation of the significance of the surrounding conservation area, registered landscape and nearby listed boundary walls.
- 4.27 Paragraph 205 requires that great weight should be given to conservation of designated heritage assets, where conservation is defined in Annex 2 of the NPPF as the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance. Again, it is our assessment that these proposals for a new replacement sports pavilion on Site would conserve each of the identified designated heritage assets, and also sustain and or enhance their significance (and setting).

London Plan 2021

- 4.28 In accordance with Policy HC1 of the London Plan, this report and the full application material demonstrate that the proposed scheme has sought to appropriately value and conserve the affected heritage assets, and would also be sympathetic to the character of its local context.

LBRuT Local Plan 2018

- 4.29 It is demonstrated in this report that these proposals would conserve, and also to a degree enhance, the historic environment of the Borough, in accordance with Policy LP 3 (criterion A). These proposals would conserve each of the identified designated heritage assets, and also sustain and or enhance their significance (and setting) (also criteria C and E).
- 4.30 The proposed development would also ensure that the quality of existing views and vistas, and the skyline, which contribute to the character of the local area would be protected and not adversely effected; in accordance with Policy LP 5. This includes consideration of views identified within the conservation area (and any SPG) and the BPMP 2014, where relevant.
- 4.31 Due consideration has also been given to the draft Local Plan Publication (Regulation 19) Consultation that has now been submitted for examination, and these proposals found to be in accordance with the direction of travel of that new plan.

5. Summary and Conclusions

- 5.1 This Built Heritage Statement report has been prepared by Turley on behalf of our Client and the Applicant to provide relevant and proportionate information to the local planning authority with regard to heritage impacts associated with the erection of a replacement sports pavilion for the RHWCC following the loss through fire of that pre-existing on Site. This is a Site located within the Bushy Park Conservation Area, the Bushy Park Registered Park and Garden (Grade I) and also within the setting of the listed Boundary Walls to the park (Grade II).
- 5.2 In summary, and in accordance with the requirements of the NPPF 2023, the significance (and setting) of the relevant heritage assets have been described in this report in a proportionate manner (**Sections 2 and 3**). Accordingly, the approach to the location and also detailed design of the replacement pavilion for this sports club within the park has been informed by a clear understanding and appreciation of the heritage significance of the conservation area and historic landscape.
- 5.3 The proposed new pavilion will include improved facilities for the sports club, including four changing rooms, a club room / social space, with a bar and other catering facilities, secure storage areas, and facilities for officials. Overall the scale, form and design of this new replacement building has been determined not only by the pre-existing pavilion and current English Cricket Board (ECB) guidelines for these sports, but also by the current aspirations of the club to continue to evolve and improve, including creating a more accessible, inclusive and sustainable building at a high quality of architecture.
- 5.4 As described in **Section 4**, the proposed replacement pavilion building would be comparable in overall scale to that pre-existing, albeit lower in maximum height, and also would adopt a more refined and attractive form and quality detailed design / materiality. Within surrounding views the replacement building would not have any significantly greater visual impact, would again sit comfortably within its wider landscape setting, and would also take opportunities to add further positive interest and variety to these views through its architectural quality.
- 5.5 Overall these proposals would not detract in any way from the current appreciation of the defining characteristics of the historic landscape of this much more expansive parkland or the character and appearance of the conservation area and registered park and garden. The significance of each of these designated heritage assets (also including the setting of the nearby listed boundary walls) would be sustained, and to a degree enhanced, by these proposals.
- 5.6 In conclusion, the application scheme would be in accordance with the principles of the relevant statutory duties of the Planning (Listed Buildings and Conservation Areas) Act 1990 in relation to listed buildings and conservation areas, national policy set out in the NPPF 2023 (paragraphs 200-201, 203 and 205) and supported by NPPG, and local policy and guidance, including the London Plan 2021 (policy HC1) and LBRuT Local Plan 2018 (policies LP 3 and LP 5).

Appendix 1: Conservation Area Boundary Map

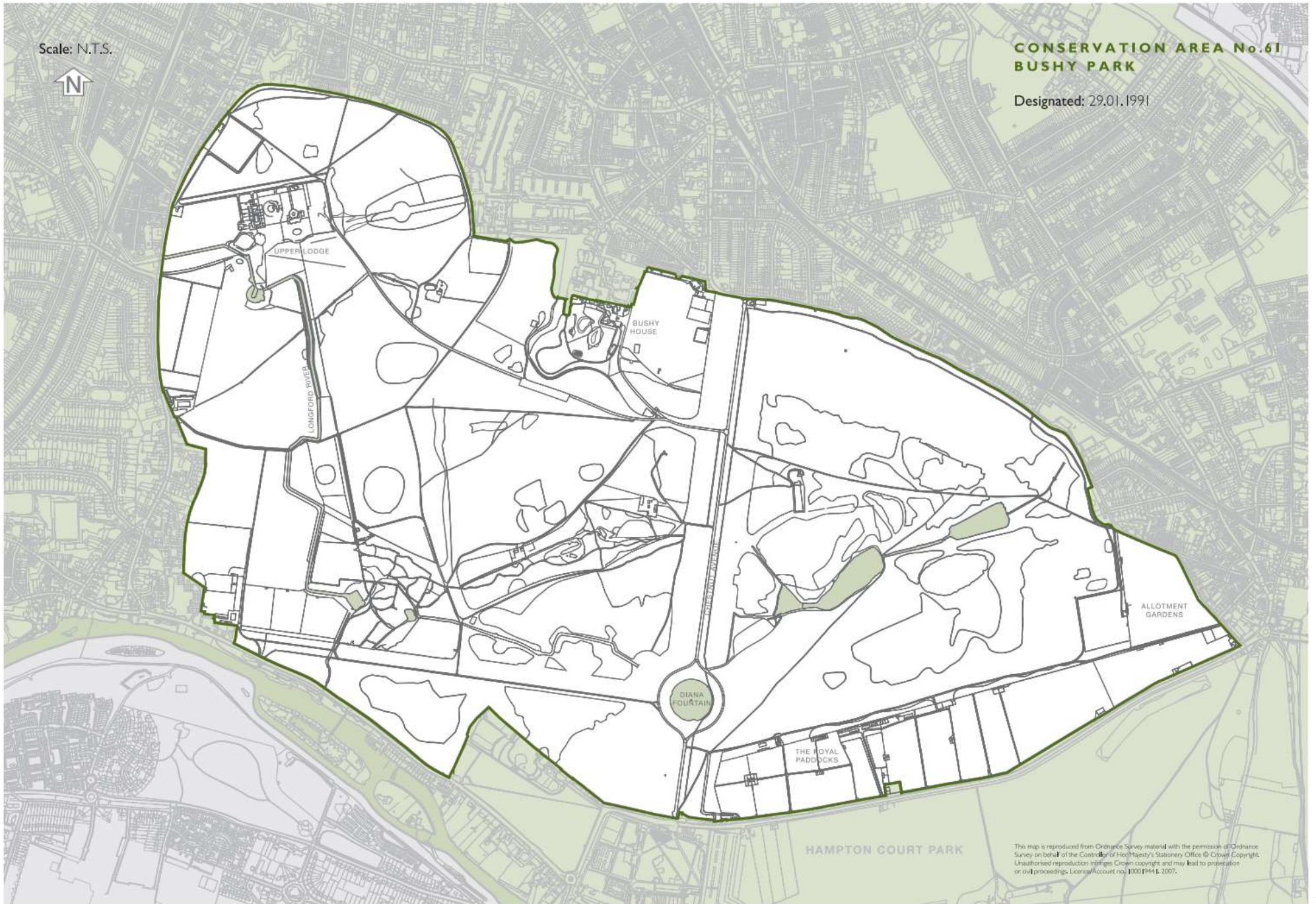
Bushy Park

Scale: N.T.S.



**CONSERVATION AREA No. 61
BUSHY PARK**

Designated: 29.01.1991



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Appendix 2: List / Register Entry

Bushy Park

Official list entry

Heritage Category: Park and Garden

Grade: I

List Entry Number: 1000281

Date first listed: 30-Sep-1987

Location

The building or site itself may lie within the boundary of more than one authority.

County: Greater London Authority

District: Richmond upon Thames (London Borough)

Parish: Non Civil Parish

National Grid Reference: TQ 15837 69642

Details

A royal deer park with C15 origins enlarged by subsequent monarchs and improved by, among others, George London and Henry Wise.

HISTORIC DEVELOPMENT

The history of the site as a deer park began in 1491 when Giles d'Aubrey enclosed 162ha of arable farmland in the area of Middle Park. By 1504 Cardinal Wolsey, while involved at Hampton Court, enclosed as one three separate areas of ploughed farmland: Bushy Park, Middle Park, and Hare Warren. He also enclosed the Home Park of Hampton Court Palace. When Hampton Court became the property of Henry VIII in 1529 the enclosed parkland formed his deer park there. In 1629 James I added a further 68ha (Court Field) into Bushy Park on the Hampton side and enclosed it with a wall. In the mid C17 a tributary of the River Colne was diverted through Bushy Park and new ponds were made.

In 1709 the first Lord Halifax, one of William III's most eminent financiers, became Keeper of Bushy Park and moved into Lower Lodge and in 1713 he added the keepership of Middle Park and Hare Warren. It was at this time that the distinction between the three parks broke down and the whole area north of Hampton Court Road became known as Bushy Park.

In 1771 Prince William, Duke of Clarence lived as the Ranger in Bushy House and in order to supplement his small income he worked on a programme of woodland clearance, the cleared land being let to tenant farmers. During the reign of Queen Victoria Chestnut Sunday celebrations were held every spring; the tradition ceased during the Second World War but was resumed in 1976. In 1900 the National Physical Laboratory was established in the grounds of Bushy House where it has remained.

Bushy Park was used in both world wars: the Canadians used Upper Lodge as the King's Canadian Hospital in the First World War; and troops from the USA used an area mainly to the east of the

Chestnut Avenue as a base camp, Camp Griffith. In 1944 General Eisenhower moved the Supreme Headquarters Allied Expeditionary Forces to Bushy Park.

Bushy Park continues (1997) to be a royal park, managed by the Royal Parks Agency as a public open space with c 4000 free-standing trees, c 40ha of open and enclosed woodland, and a current deer population of c 325.

DESCRIPTION

LOCATION, AREA, BOUNDARIES, LANDFORM, SETTING Bushy Park is located in outer south-west London c 200m north of Hampton Court Palace. It is bounded to the north-east by Sandy Lane (B358), to the south and south-west by Hampton Court Road, and to the west by High Street, Hampton Wick (A311) and residential developments in the vicinity of Garrick's Villa (qv). The northern boundary is provided by numerous residential developments to the south and south-west of Hampton Road.

The 450ha of parkland is situated on flat, low-lying ground forming part of the Thames flood plain. There are eleven royal lodges in the park, including those associated with Upper Lodge (listed grade II) and Bushy House (listed grade II). The boundary walls (parts listed grade II) are dated variously to the C16, C17, and C19. Ancient oaks from the C16 survive along the perimeter at Hampton Hill to the north-west.

ENTRANCES AND APPROACHES The main entrance is from Hampton Court Road to the south, through Hampton Court Gate and past Hampton Court Gate Lodge (listed grade II). The public road leads around a circular basin, in the middle of which stands the Diana Fountain (listed grade II), and continues in a straight line for 1km along the Chestnut Avenue to Teddington Gate (Teddington Lodge designed by Decimus Burton 1827), and Park Road to the north. Made as part of Sir Christopher Wren's uncompleted scheme for a new entrance to Hampton Court, the road runs down the centre of an avenue developed from a lime avenue planted c 1622 by James I. The Chestnut Avenue, now (1997) made up from four outer rows of limes and two inner rows of chestnuts, was replanted under the direction of George London (c 1640-1714) and Henry Wise (1653-1738) between 1689 and 1699. Having been gradually renewed since that time, extensive repairs were necessary after the storms of 1987 and 1990. The Diana Fountain (which represents Arethusa and not Diana) was moved from the Privy Garden at Hampton Court Palace to the C17 circular basin in 1713. Additional gates provide mainly pedestrian access to the park: Hampton Wick Gate, Sandy Lane Gate, and Church Grove Gate from the east, Duke's Head Passage Gate from the west, Coleshill Road Gate to the north, and Hampton Hill New Gate, Gravel Pit Gate, and Blandford Road Gate from the north-west.

PRINCIPAL BUILDING The brick-built Lower Lodge, now called Bushy House (listed grade II*), is situated to the north of the site, to the west of the Chestnut Avenue. The mansion, built in the late C17 for Charles II, was extended for the occupation of William IV before and after his accession. The original house consists of a square centre block with a low square pavilion at each corner linked to the main front by a curved screen wall and passage.

Bushy House stands in its own grounds with a garden building, the early C19 Doric rotunda, to the south-west (listed grade II) and an early C19 Orangery (listed grade II) to the west. Guns Lodge (listed grade II), designed by Decimus Burton in 1827, stands in the entrance.

Since 1900 the National Physical Laboratory has been housed in the grounds; its Director is currently (1997) accommodated in the mansion, with the basement and ground floor used as a laboratory.

PARK The park is divided by the north/south route of the Chestnut Avenue. The land to the east is divided from north-east to south-west by a branch of the Longford River. In 1638-9 Charles I had a tributary of the River Colne diverted through Bushy Park to make the Longford River and during the Commonwealth period water from the southern part of the river was redirected to feed the new Heron and Leg of Mutton Ponds. There are scattered clumps of trees, small plantations, and areas of grassland. Much of the bracken in the park is concentrated in this area and provides cover for the deer. Three main paths cut across the area. A path from south of the Diana Fountain runs east along the north boundary of a children's playground, the C18 Royal Paddocks, and the south boundary of the Cricket Ground before terminating in front of Church Grove Gate. A second path leads north-east, with the Oval Plantation to the east, passing between the Heron and Leg-of-Mutton Ponds before linking up with the third path, Cobbler's Walk, which runs 2.8km west from Hampton Wick Gate, across the Chestnut Avenue, to Duke's Head Passage. Cobbler's Walk got its name after an incident in c 1752 when the second Earl of Halifax closed a public right of way which ran through the park from Hampton Wick to Kingston. When threatened with court action by a local cobbler the Earl reopened the path which has since been known as Cobbler's Walk. The C19 Half Moon Plantation and Hawthorn Cottage (listed grade II) lie to the south of Cobbler's Walk, and the C19 Warren Plantation with the C20 USAAF memorial, to the north.

The larger part of the park which lies to the west of the Chestnut Avenue is divided by a number of features. These include the C17 east/west Lime Avenue which extends west from the Diana Fountain for 1km, terminating at the White Lodge (listed grade II) and, to the north of the Lime Avenue, the 24ha Waterhouse Woodland Garden, created 1948-9 from a c 1925 wooded walk which consisted of two early C19 plantations, the Queens River, and a branch of the Longford River which runs to the north.

In the northern part of the area Cobbler's Walk divides, the southern path leading across open parkland to link with the Duke's Head Passage path across the Longford River via the Iron Bridge, through Brewhouse Fields, before terminating at Duke's Head Passage Gate. The northern spur, Upper Lodge Road, leads past the grounds of Bushy House and continues north-west, with the Round Plantation to the south and Barton's Cottage to the north, before terminating at the C18 Upper Lodge (listed grade II). The second Earl Halifax created elaborate water gardens in the grounds of Upper Lodge. Water was taken from the Longford River through a series of pools and canals to the east, west, and south of the house (Rocque 1746). Only part of this feature survives today (two pools in the grounds of Upper Lodge and the water in Canal Plantation). The water gardens and Upper Lodge were vacated by the Ministry of Defence in the late C20 and are now (1997) managed by a Trust who have plans to restore the water features. Paths from the four gates to the north-west of the site converge, across parkland, on the north-east corner of Upper Lodge

OTHER LAND The 100 acre (c 41ha) farm at the Stockyard to the south-west of Bushy Park was in recent times used as the maintenance depot for the park and is now (1997) the Bushy Park Environment Centre. The Centre, in conjunction with the Holly Lodge Centre at Richmond Park (qv), aims to provide a facility from which open-air activities of all kinds can be enjoyed. The area contains a number of mostly Victorian farm buildings, paddocks, and White Lodge (listed grade II). The Stockyard, part of which was taken into Bushy Park by James I, is bordered to the west by a brick wall and to the east by the Longford River. The remains of Garrick's Mound (qv Garrick's Villa), which were incorporated into Bushy Park in the early C20, survive in a paddock to the north-west of the area. The west end of Duke's Head Passage crosses the northern part of the farm and provides public access to the main part of Bushy Park to the east.

To the north of the Stockyard are the Brewhouse Fields, managed (1997) as a wildlife conservation area; and the Brewhouse (listed grade II), once part of Lord Halifax's estate at Upper Lodge and now used as a store for the holders of the adjacent allotments.

The privately maintained Hampton Swimming Pool is situated on the western boundary, north of Duke's Head Passage.

REFERENCES

B Cherry and N Pevsner, *The Buildings of England: London 2 South* (1983), pp 500, 536 *Bushy Park, A Guide*, (The Royal Parks 1983)

Royal Parks Historical Survey: Hampton Court and Bushy Park, (Travers Morgan Planning 1982) Draft Management Plan, (Land Use Consultants 1995) [Note: the last two items contain extensive bibliographies and copies of historical maps.]

Maps J Rocque, *Plan of the Cities of London and Westminster and Borough of Southwark and the country near ten miles around*, surveyed 1741-5, published 1746

OS 25" to 1 mile: 1st edition published 1864 2nd edition published 1896

Description written: June 1997 Register Inspector: LCH Edited: November 2001

Legacy

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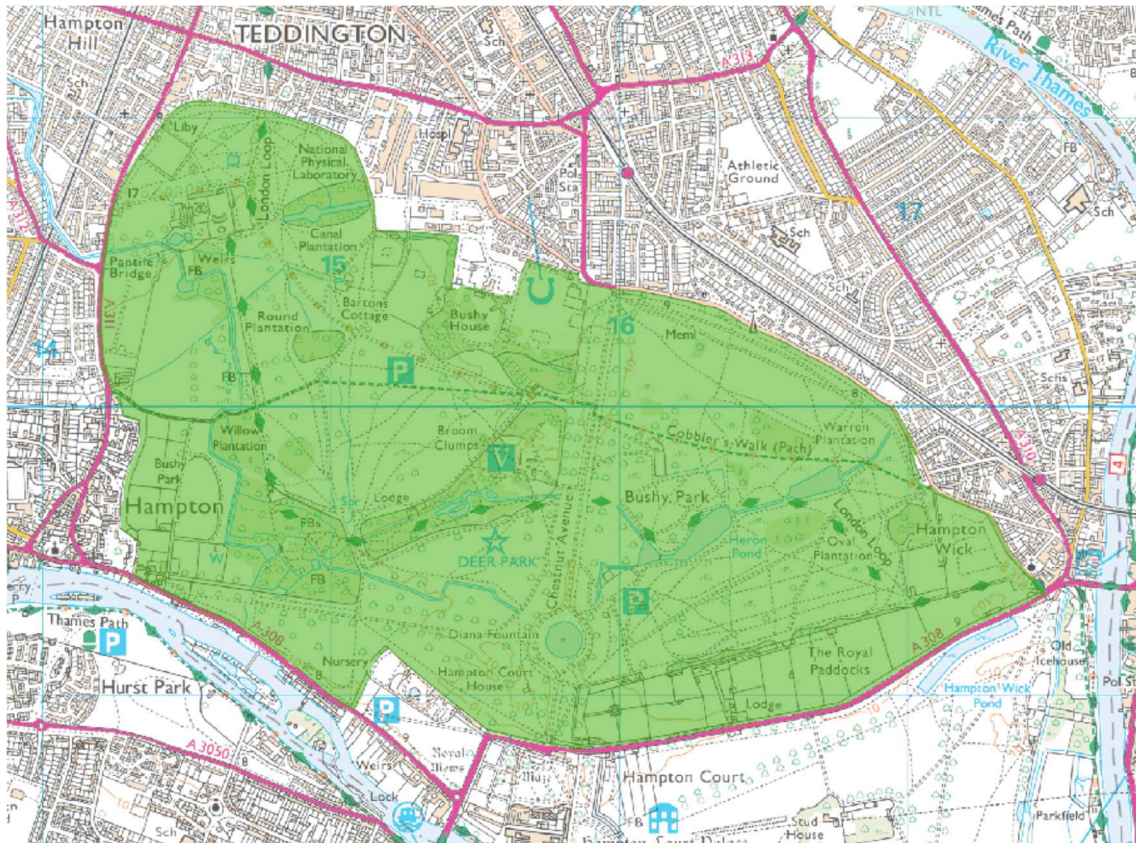
Legacy System number: 1208

Legacy System: Parks and Gardens

Legal

This garden or other land is registered under the Historic Buildings and Ancient Monuments Act 1953 within the Register of Historic Parks and Gardens by Historic England for its special historic interest.

Map



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Appendix 3: Heritage Legislation, Planning Policy and Guidance

Statutory Duties

The Planning (Listed Buildings and Conservation Areas) Act 1990

1. The Planning (Listed Buildings and Conservation Areas) Act 1990 provides that with regard to applications for planning permission affecting the setting of listed buildings:

“s.66(1) In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”

2. With regard to applications for planning permission within conservation areas, it is set out that:

“s.72(1) In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”

3. Case law²³ has confirmed that Parliament’s intention in enacting Section 66(1) was that decision-makers should give “considerable importance and weight” to the desirability of preserving the setting of listed buildings, where “preserve” means to “to do no harm” This duty must be borne in mind when considering any harm that may accrue and the balancing of such harm against public benefits as required by national planning policy.²⁴ It has also been confirmed²⁵ that ‘considerable importance and weight’ is not synonymous with ‘overriding importance and weight’.

National Policy

National Planning Policy Framework (NPPF) 2023

4. The NPPF was first introduced in March 2012 as the full statement of Government planning policies covering all aspects of the planning process. It has subsequently been republished as revised; most recently in December 2023. Chapter 16 Conserving and enhancing the historic environment, sets out the Government’s policies regarding planning and the historic environment. The glossary of the NPPF (Annex 2) defines conservation as the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.
5. Paragraph 200 requires the significance of the heritage assets, which may be affected by the proposals to be described as part of any submission, ideally as part of a Heritage Statement report. The level of detail should be proportionate to the importance of the assets and sufficient to understand the potential impact of the proposals on their significance. Paragraph 201 sets out that local planning authorities should also identify

²³ HMSO (1990) Planning (Listed Buildings and Conservation Areas) Act
Barnwell Manor Wind Energy Limited and (1) East Northamptonshire District Council (2) English Heritage (3) National Trust (4) The Secretary of State for Communities and Local Governments, Case No: C1/2013/0843, 18 February 2014

²⁴ Jones v Mordue [2015] EWCA Civ 1243 at paragraph 28, and *City and Country Bramshill v. Secretary of State* [2021] EWCA Civ 320 at paragraph 72

²⁵ Land at Razor’s Farm, Chineham, Basingstoke RG24 8LS. Appeal Reference: APP/H1705/A/13/2205929, Secretary of State for Communities and Local Government letter 22nd September 2014, paragraph 21

and assess the particular significance of heritage assets that may be affected by proposals. They should take this assessment into account when considering the impact of proposals in order to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

6. Paragraph 203 states that local planning authorities should take account of the desirability of sustaining and enhancing the significance of all heritage assets and putting them into viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.
7. With regard to considering impacts, paragraph 205 outlines that local planning authorities should give great weight to the asset's conservation when considering the impact on a proposed development on the significance of a designated heritage asset. The more important the heritage asset, the greater the weight should be.
8. Paragraph 206 specifies that any harm to, or loss of, significance of a designated heritage asset should require clear and convincing justification. Paragraph 207 outlines that local planning authorities should refuse consent where a proposal will lead to substantial harm or total loss of significance, unless it can be demonstrated that this is necessary to deliver substantial public benefits that outweigh such harm or loss, or a number of other tests can be satisfied. Paragraph 208 concerns proposals which will lead to less than substantial harm to the significance of a designated heritage asset. Here harm should be weighed against the public benefits, including securing the optimum viable use.
9. Paragraph 209 establishes that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
10. Paragraph 212 states that proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of a heritage asset should be treated favourably. It outlines that local planning authorities should also look for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance.
11. Paragraph 213 outlines that not all elements of a conservation area will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the area should be treated either as substantial harm under paragraph 207 or less than substantial harm under paragraph 208, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the conservation area as a whole.

The Development Plan

12. The Development Plan for the London Borough of Richmond upon Thames (LBRuT) comprises the London Plan 2021, and the adopted Local Plan 2018, and also any

adopted (or "made") neighbourhood plans with that local authority area. These documents provide local guidance with regard to development affecting heritage assets, and should accord with the statutory duties and the general principles outlined in the NPPF.

13. LBRuT are currently preparing a new Local Plan for the Borough which will replace the current Local Plan and the Twickenham Area Action Plan, albeit this is still at the plan-making process. Appropriate weight should be given to the draft Local Plan therefore, including the draft Local Plan Publication (Regulation 19) Consultation Version that we submitted for examination in January 2024.

The London Plan 2021

14. The London Plan was adopted in March 2021, and replaces the previous London Plan (2016 with alterations since 2011) and relevant policies. Policy HC1 of the new London Plan relates to heritage conservation and growth and which states that:

- A. *“Boroughs should, in consultation with Historic England and other relevant statutory organisations, develop evidence that demonstrates a clear understanding of London’s historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to the heritage assets, landscapes and archaeology within their area.*
- 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:*
 - 1) *setting out a clear vision that recognises and embeds the role of heritage in place-making*
 - 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 sustain 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 seek to avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.*

- D. *Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.*
- E. *Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use.”*

London Borough of Richmond upon Thames Local Plan 2018

15. The Local Plan for the LBRuT was adopted on 3 July 2018 and then on 3 March 2020 in relation to two legal challenges. It sets out policies and guidance for the development of the borough over the next 15 years. Part of the borough’s strategic vision includes ‘Protecting Local Character’:

“Villages and historic environment

The borough's villages and their special and distinctive characters will have been protected, with each being unique, recognisable and important to the community and to the character of the borough as a whole. They will continue to maintain and enhance their distinctiveness in terms of the community, facilities and local character. Heritage assets including listed buildings and Conservation Areas , historic parks as well as Royal Botanic Gardens, Kew World Heritage Site, which contribute so significantly to the character of this borough, will have been protected and enhanced.”

16. In line with this overarching vision, one of the Local Plan’s Strategic Objectives also relates to protecting local character, and sets out the Council’s intention to:

“1. Maintain and enhance the borough's attractive villages, including the unique, distinctive and recognisable local characters of the different village areas and their sub-areas.

2. Protect and, where possible, enhance the environment including the heritage assets, retain and improve the character and appearance of established residential areas, and ensure new development and public spaces are of high quality design.

3. Protect and improve the borough's parks and open spaces to provide a high quality environment for local communities and provide a balance between areas for quiet enjoyment and wildlife and areas to be used for sports, games and recreation.

4. Protect and enhance the borough's network of green infrastructure that performs a wide range of functions for residents, visitors, biodiversity and the economy.

5. Protect and enhance the borough's biodiversity, including trees and landscape, both within open spaces but also within the built environment and along wildlife corridors.

6. Protect and improve the unique environment of the borough's rivers, especially the River Thames and its tributaries as wildlife corridors, as opportunities for recreation and

river transport where possible, increasing access to and alongside the rivers where appropriate, and gain wider local community benefits when sites are redeveloped.'

17. Policy LP 1 (Local Character and Design Quality) sets out that:

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

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

- 1. compatibility with local character including the relationship to existing townscape, development patterns, views, local grain and frontages as well as scale, height, massing, density, landscaping, proportions, form, materials and detailing;*
- 2. sustainable design and construction, including adaptability, subject to aesthetic considerations;*
- 3. layout, siting and access, including making best use of land;*
- 4. space between buildings, relationship of heights to widths and relationship to the public realm, heritage assets and natural features;*
- 5. inclusive design, connectivity, permeability (as such gated developments will not be permitted), natural surveillance and orientation; and*
- 6. suitability and compatibility of uses, taking account of any potential adverse impacts of the co-location of uses through the layout, design and management of the site.*

All proposals, including extensions, alterations and shop fronts, will be assessed against the advice set out in the relevant Village Planning Guidance and other SPDs relating to character and design ..."

18. Policy LP 3 (Designated Heritage Assets) states that (A) new development will be expected 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.

2. Resist the demolition in whole, or in part, of Listed Buildings. Consent for demolition of Grade II Listed Buildings will only be granted in exceptional circumstances and for Grade II and Grade I Listed Buildings in wholly exceptional circumstances following a thorough assessment of their significance.*

3. Resist the change of use of Listed Buildings where this would materially harm their character and distinctiveness, particularly where the current use contributes to the character of the surrounding area and to its sense of place.

4. Require the retention and preservation of the original structure, layout, architectural features, materials as well as later features of interest within Listed Buildings, and resist the removal or modification of features that are both internally and externally of architectural importance or that contribute to the significance of the asset.

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

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

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

B. Resist substantial demolition in Conservation Areas and any changes that could harm heritage assets, unless it can be demonstrated that:

1. in the case of substantial harm or loss to the significance of the heritage asset, it is necessary to achieve substantial public benefits that outweigh that harm or loss;

2. in the case of less than substantial harm to the significance of the heritage asset, that the public benefits, including securing the optimum viable use, outweigh that harm; or

3. the building or part of the building or structure makes no positive contribution to the character or distinctiveness of the area.

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

D. Where there is evidence of intentional damage or deliberate neglect to a designated heritage asset, its current condition will not be taken into account in the decision-making process.

E. Outline planning applications will not be accepted in Conservation Areas. 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.”

19. Policy LP 4 sets out that 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. There will be a presumption against the demolition of Buildings of Townscape Merit.

20. Policy LP 5 (Views and Vistas) provides that the Council will protect the quality of the views, vistas, gaps and the skyline, all of which contribute significantly to the character, distinctiveness and quality of the local and wider area, by the following means:

“1. protect the quality of the views and vistas as identified on the Proposals Map, and demonstrate such through computer-generated imagery (CGI) and visual impact assessments;

2. resist development which interrupts, disrupts or detracts from strategic and local vistas, views, gaps and the skyline;

3. require developments whose visual impacts extend beyond that of the immediate street to demonstrate how views are protected or enhanced;

4. require development to respect the setting of a landmark, taking care not to create intrusive elements in its foreground, middle ground or background;

5. seek improvements to views, vistas, gaps and the skyline, particularly where views or vistas have been obscured, will be encouraged where appropriate;

6. seek improvements to views within Conservation Areas, which:

1. are identified in Conservation Area Statements and Studies and Village Plans;

2. are within, into, and out of Conservation Areas;

3. affect the setting of and from development on sites adjacent to Conservation Areas and Listed Buildings.”

Other Material Considerations

National Guidance

National Planning Policy Guidance (NPPG)

21. National Planning Practice Guidance was first issued in 2014 by the Government as a web resource, including a category on conserving and enhancing the historic environment. This is intended to provide more detailed guidance and information with regard to the implementation of national policy set out in the NPPF. It has been updated as a living document and web resource, most recently in July 2019.

National Advice

Department of Culture, Media and Sport Circular: Principles of Selection for Listing Buildings 2018

22. The Principles of Selection for listing buildings sets out the general criteria for assessing the special interest of a building in paragraph 16, as below:

“Architectural Interest. To be of special architectural interest a building must be of importance in its architectural design, decoration or craftsmanship; special interest may also apply to nationally important examples of particular building types and techniques (e.g. buildings displaying technological innovation or virtuosity) and significant plan forms;

Historic Interest. To be of special historic interest a building must illustrate important aspects of the nation’s social, economic, cultural, or military history and/or have close historical associations with nationally important people. There should normally be some quality of interest in the physical fabric of the building itself to justify the statutory protection afforded by listing.”

23. When making a listing decision, paragraph 17 sets out that the Secretary of State may also take into account:

“Group value: The extent to which the exterior of the building contributes to the architectural or historic interest of any group of buildings of which it forms part, generally known as group value. The Secretary of State will take this into account particularly where buildings comprise an important architectural or historic unity or a fine example of planning (e.g. squares, terraces or model villages) or where there is a historical functional relationship between the buildings. Sometimes group value will be achieved through a co-location of diverse buildings of different types and dates.

Fixtures and features of a building and curtilage buildings: The desirability of preserving, on the grounds of its architectural or historic interest, any feature of the building consisting of a man-made object or structure fixed to the building or forming part of the land and comprised within the curtilage of the building.

The character or appearance of conservation areas: In accordance with the terms of section 72 of the 1990 Act, when making listing decisions in respect of a building in a conservation area, the Secretary of State will pay special attention to the desirability of preserving or enhancing the character or appearance of that area.”

24. General principles for selection are also set out in this advice, in paragraphs 18-23. These include: Age and rarity; Buildings less than 30 years old; Aesthetic merits; Selectivity; and National interest, although State of repair will not usually be a relevant consideration.
25. In addition to the criteria and general principles set out in the guidance, a number of Selection Guides for different building types have been published by Historic England, first in 2011 and then later updated up to 2018. These selection guides provide further information regarding each building type, and demonstrate what features are considered significant and likely to make a building of special architectural or historic

interest when assessing each building type.

26. Equivalent Selection Guides for registered parks and gardens of historic interest have also been published by Historic England regarding each landscape type.

Historic England Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision Taking in the Historic Environment 2015

27. GPA Note 2 provides information to assist in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the National Planning Practice Guidance (NPPG). These include; assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, and marketing. It provides a suggested staged approach to decision-making where there may be a potential impact on the historic environment:

- 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 Framework;*
- 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 and the need for change;*
- 6. Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.*

28. With particular regard to design and local distinctiveness, advice sets out that both the NPPF (section 7) and NPPG (section ID26) contain detail on why good design is important and how it can be achieved. In terms of the historic environment, some or all of the following factors may influence what will make the scale, height, massing, alignment, materials and proposed use of new development successful in its context:

- *The history of the place*
- *The relationship of the proposal to its specific site*
- *The significance of nearby assets and the contribution of their setting, recognising that this is a dynamic concept*
- *The general character and distinctiveness of the area in its widest sense, including the general character of local buildings, spaces, public realm and the landscape, the grain of the surroundings, which includes, for example the street pattern and plot size*
- *The size and density of the proposal related to that of the existing and neighbouring uses*
- *Landmarks and other built or landscape features which are key to a sense of place*
- *The diversity or uniformity in style, construction, materials, colour, detailing, decoration and period of existing buildings and spaces*
- *The topography*
- *Views into, through and from the site and its surroundings*
- *Landscape design*

- *The current and historic uses in the area and the urban grain*
- *The quality of the materials.*

Historic England: Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets 2017 (2nd Edition)

29. GPA Note 3 provides information to assist in implementing historic environment policy with regard to the managing change within the setting of heritage assets, and also now views analysis. This also provides a toolkit for assessing the implications of development proposals affecting setting and views. A series of stages are recommended for assessment, these are:

- *Step 1: identifying the heritage assets affected and their settings*
- *Step 2: assessing whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s)*
- *Step 3: assessing the effect of the proposed development*
- *Step 4: maximising enhancement and minimising harm*
- *Step 5: making and documenting the decision and monitoring outcomes.*

Historic England: Advice Note 1: Conservation Area Designation, Appraisal and Management 2019 (2nd Edition)

30. This advice note is intended to set out ways to manage change in a way that conserves and enhances historic areas through conservation area designation, appraisal and management. It seeks to offer advice to all those involved in managing conservation areas so that the potential of historic areas worthy of protection is fully realised, the need for community and owner consultation examined, and the benefits of management plans to manage change, and achieve regeneration and enhancement, fully exploited. Advice on appraisal of conservation areas is also given, as assistance in demonstrating special interest and articulating character, guiding investment, and in developing a management plan.

Historic England: Advice Note 2: Making Changes to Heritage Assets 2016

31. This advice note provides general advice according to different categories of intervention in heritage assets, including repair, restoration, addition and alteration, as well as on works for research alone. This covers different types of heritage assets, including buildings and other structures; standing remains including earthworks; buried remains and marine sites; as well as larger heritage assets including conservation areas, registered landscapes, and World Heritage Sites.

Historic England Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets 2019

32. This advice note provides guidance with regard to the NPPF requirement for applicants for heritage and other consents to describe heritage significance, to help local planning authorities make decisions on the impact of proposals for change to heritage assets. It explores the assessment of heritage significance as part of a stage approach to decision-making, in which assessing significance precedes designing the proposals. It also describes the relationship with archaeological desk-based assessments and field evaluations, as well as Design & Access Statements.

English Heritage (now Historic England): Conservation Principles: Policies and Guidance 2008

33. Historic England has also published further guidance on the management of the historic

environment; principally to establish a framework for their own decision making as the Government's adviser. This sets out "conservation principles"; including understanding "heritage values" and also assessing heritage significance. This guidance document is now under revision, and a consultation draft was issued by Historic England at the end of 2017. This is yet to be formally published as a final version. One principal aim of this new draft is greater consistency of approach; and to more closely align heritage values with the statutory and national policy definitions of special interest and significance.

Supplementary Planning Guidance / Other

London Borough of Richmond upon Thames: Planning Information for Conservation Areas 2002

34. This leaflet sets out to explain how the legislation and planning policy concerning Conservation Areas affects people who live, work or own property in them.

London Borough of Richmond upon Thames: Planning Information for Listed Buildings 2002

35. This leaflet sets out to explain how the legislation and planning policy concerning Listed Buildings affects people who live, work or own property in them.

London Borough of Richmond upon Thames: Bushy Park Conservation Area 61 Statement (undated)

36. This document provides a high-level description of the conservation area and explains why and when it was designated, plus a short history and a map showing the boundary.

London Borough of Richmond upon Thames (Consultation Draft): Local Views SPD 2022

37. The purpose of the draft Local Views SPD is to set out those existing protected views that have already been adopted through the Local Plan, as well as additional new locally important views. Consulting on this draft SPD is the first step in developing the Local Views SPD, which has yet to be formally adopted.

The Royal Parks: Bushy Park Management Plan 2014-2024, 2014

38. This management plan provides the structure 'to conserve and enhance the essential and varied character' of the park. It includes policies and guidance, along with the future management of the park and its use and development. It uses the subdivision of character areas as a management tool in 'recognising the relative complexities of historical layering, ecology and significant elements of the park'.

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