



Heritage Impact Assessment

Sion Court,
Twickenham

December 2021 | Project Ref 7615



HCUK Group is a multi-disciplinary environmental practice offering expert advice in archaeology, heritage, landscape, arboriculture, and planning. It began life in 2010 as Heritage Collective LLP, before becoming Heritage Collective UK Limited in 2014. In the coming years diversification saw the addition of Archaeology Collective, Landscape Collective and Planning Collective, before all strands came together to be branded under a single umbrella: HCUK Group, based on the acronym for the original company. A home working company since the beginning, we are pleased to employ a talented workforce of consultants and support staff, who are on hand to advise our clients.



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1. Introduction

- 1.1** This Heritage Impact Assessment has been prepared by Dr Jonathan Edis, Director of HCUK Group, on the instructions of Davies Murch. It relates to the proposed redevelopment of two groups of redundant garages at Sion Court in Twickenham, within Twickenham Riverside Conservation Area. Some of the garages have an upper storey, in residential use, which was probably originally for a concierge or caretaker (Figure 11). For the purposes of the assessment of significance, the group has been regarded as one building. Five new dwellings are proposed, with much improved amenity and landscaping. The scheme has been designed by an experienced architectural firm, Tal Arc, which specialises in developments of the kind proposed.
- 1.2** There are a number of designated heritage assets within the conservation area, in the general vicinity of the application site. These include the terrace known as 3-12 Sion Road, to the south-east of the application site, dating from the early 18th century and listed grade II* on 2 September 1952; this terrace is visually separated from the application site by buildings in Ferry Road, where it joins Sion Road. Another designated heritage asset is York House registered park and garden (RPG), listed grade II on 6 August 2001. This is almost completely visually separated from the proposed development by the 4.5 storey block known as Sion Court. Although the proposed development is within the vicinity of these designated heritage assets, and there could be said to be an intangible or abstract effect on their setting, the main visual effect is on an inner ring of locally listed buildings (i.e. non-designated heritage assets), namely 19 Lebanon Park, 1-7 and 9-19 Ferry Road, and 13 and 14 Sion Road.
- 1.3** The author of this assessment has nearly forty years of continuous employment in the heritage sector, including ten years as a conservation officer advising local planning authorities on applications affecting heritage assets. A large number of those cases have involved redevelopment in conservation areas.
- 1.4** A site visit was undertaken on 25 November 2021.

2. Relevant Planning Policy Framework

- 2.1** The council is required by section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area when exercising planning functions relating to development within that area. The council must give considerable importance and weight to the desirability of preserving the significance of the conservation area, and there is a strong presumption against the grant of permission for development that would harm its heritage significance.¹
- 2.2** There is a broadly similar duty arising from section 66(1) of the Act in respect of planning decisions relating to development affecting the setting of listed buildings. The position with respect to the listed buildings at 3-12 Sion Road has already been explained in Chapter 1.
- 2.3** For the purposes of this statement, preservation equates to an absence of harm.² Harm is defined in paragraph 84 of Historic England’s Conservation Principles as change which erodes the significance of a heritage asset.³
- 2.4** The significance of a heritage asset is defined in the National Planning Policy Framework (NPPF) as being made up of four main constituents: architectural interest, historical interest, archaeological interest and artistic interest. The assessments of heritage significance and impact are normally made with primary reference to the four main elements of significance identified in the NPPF. The setting of a heritage asset can contribute to its significance.
- 2.5** The NPPF requires the impact on the significance of the designated heritage asset (i.e. Twickenham Riverside Conservation Area) to be considered in terms of either “substantial harm” or “less than substantial harm” as described within paragraphs 201 and 202 of that document. National Planning Practice Guidance (NPPG) makes it clear that substantial harm is a high test, and case law describes substantial

¹ Barnwell Manor Wind Energy Limited v East Northamptonshire District Council and others [2014] EWCA Civ 137. This principle has recently been confirmed, albeit in a lower court, in R (Wyeth-Price) v Guildford Borough Council.

² South Lakeland v SSE [1992] 2 AC 141.

³ Conservation Principles, 2008, paragraph 84.

harm in terms of an effect that would vitiate or drain away much of the significance of a heritage asset.⁴ The Scale of Harm is tabulated at Appendix 1.

2.6 Paragraphs 201 and 202 of the NPPF refer to two different balancing exercises in which harm to significance, if any, is to be balanced with public benefit. Paragraph 18a-020-20190723 of National Planning Practice Guidance (NPPG) online makes it clear that some heritage-specific benefits can be public benefits. Paragraph 18a-018-20190723 of the same NPPG makes it clear that it is important to be explicit about the category of harm (that is, whether paragraph 201 or 202 of the NPPF applies, if at all), and the extent of harm, when dealing with decisions affecting designated heritage assets, as follows:

"Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated."

2.7 Paragraph 199 of the NPPF states that great weight should be given to the conservation of a designated heritage asset when considering applications that affect its significance, irrespective of how substantial or otherwise that harm might be.

2.8 Paragraph 203 of the NPPF refers to the approach to be taken towards non-designated heritage assets as follows:

"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."

2.9 Paragraph 203 of the NPPF is relevant to the locally listed buildings at 19 Lebanon Park, 1-7 and 9-19 Ferry Road, and 13 and 14 Sion Road.

2.10 Local heritage policy has been taken into account in the preparation of this assessment.

⁴ Bedford Borough Council v SCLG and Nuon UK Limited [2013] EWHC 4344 (Admin).

3. Statement of Significance

Introduction

3.1 This chapter of the report establishes the significance of the relevant heritage assets in the terms set out in the NPPF, and it comments on the contribution of setting to significance. The identification of the heritage assets equates in part to Step 1 of GPA3, and the assessment of significance equates to Step 2 of GPA3. Steps 2 and 3 of GPA3 are closely connected, so this chapter should be read in conjunction with Chapter 4 (Heritage Impact Assessment) and with the tabular methodology at Appendix 2.

Twickenham Riverside Conservation Area

3.2 The character of Twickenham Riverside Conservation Area is described by the council as follows:

"The area was originally designated in recognition of the historic and architectural value of the original village core and river frontage. It was extended to include the C18th splendour of Marble Hill Park and the setting of important surrounding buildings, particularly Montpelier Row. It was further extended westwards to include Radnor Gardens, which now forms a secluded and individual area of public open space alongside the Thames with a surviving summerhouse that is a listed building. The gardens are adjacent to St. Catherine's Convent, once the site of Alexander Pope's house and still host to the original grotto of his own design. Ryan House, a listed building, is also important in its contribution to the setting of the gardens. The area was further extended to include part of an early isolated development along Richmond Road that shares many of the Georgian and Victorian/Edwardian design characteristics as the surrounding properties that are within the conservation area.

Sandwiched between the river and the principal road to Richmond, both landscape and townscape have been determined by the proximity of the River Thames. A double curve of the river gives continuing unfolding views of both banks framed by mature trees and foliage. The Conservation Area is classed as being of significant archaeological interest and the 17th century York House, and its grounds are listed.

The Village core, on the raised river terrace including Church Street and its associated alleyways, forms a focal point when viewed from the Thames and is closely linked to it. The medieval settlement is clearly visible from as far away as Radnor Gardens, Ham House and Richmond Hill. Physical and visual links between the original village street, Church Street, and the Thames are very important as evidence of the village's historical development and present day character.

The topography is one of narrow streets and alleyways lined with two and some three storey buildings. Many of these are listed and date from at least the 18th century, although burgage plots have survived since their medieval foundation. New development has respected this scale and the listed St. Mary's Church has remained the village's focal point."

- 3.3** It is self-evident that Twickenham Riverside Conservation Area is of special architectural and historic interest, and that it is of at least regional significance.

Locally listed buildings

- 3.4** Locally listed buildings are identified on Figure 2, and are illustrated in Figures 7 to 9 and 14 and 15. They are non-designated heritage assets forming a loose group. Their shared setting can generally be described as suburban.

The application site

- 3.5** The application site is on the eastern corner of the T-junction where Lebanon Park meets Sion Road (Figures 1, 2, 3 to 6 and 13). Two multi-storey flatted developments were constructed on this junction in the mid-1930s, called Lebanon Court and Sion Court. They were described as a "Magnificent modern building" in an advertisement in the West London Observer of 12 June 1936, at which time annual rents started at £95. Map evidence suggests that there had formerly been a commercial nursery on the site, containing glasshouses. It seems that Lebanon Court was finished first, perhaps by 1934-1935, and that Sion Court was probably completed about 1935-1936 (Figure 1). Sion Court is not exactly L-shaped on plan, but instead is cranked slightly to follow a slight curve in Sion Road.
- 3.6** The O.S. map of 1936 (Figure 1) shows four garages at the back (east) of Sion Court, and what seems to be the two-storey flat-roofed building currently on the

site, that projects forward slightly and that has three garage doors in the ground floor (Figures 10 and 11). It is clear that the full run of c.14 garages on the eastern boundary of the site, that we see today, was added after 1936. A further detached run of six garages was also added, at right angles, after 1936 (Figure 12). These later garages are thought to be of post-war construction.

3.7 It is necessary, when considering the demolition of unlisted buildings in conservation areas, to establish whether they make a positive contribution to the character and appearance of the area. This exercise is undertaken in Appendix 3. The conclusion is that the structures in question do not make a positive contribution.

Summary of significance

3.8 Twickenham Riverside Conservation Area is of special architectural and historic interest and of at least regional significance. It contains a number of designated heritage assets which are of special interest in their own right, including 3-12 Sion Road (grade II*) and York House RPG (grade II). Numbers 19 Lebanon Park, 1-7 and 9-19 Ferry Road, and 13 and 14 Sion Road, are locally listed, and are regarded as non-designated heritage assets). The locally listed buildings form a loose-knit group, which has a shared setting within the wider context of the designated heritage assets.

4. Heritage Impact Assessment

Introduction

- 4.1** This chapter of the assessment describes how the proposed development will affect the setting and significance of the heritage assets identified in the preceding chapter. It equates in part to Step 3 of GPA3. Steps 2 and 3 of GPA3 are closely connected, so this chapter should be read in conjunction with Chapter 3 (Statement of Significance) and with the tabular methodology at Appendix 2.
- 4.2** The proposed development involves the complete removal of the garages and the first floor flat-roofed residential building, and the construction of five new dwellings with much improved landscaping and amenity.

Effect on listed and locally listed buildings

- 4.3** The proposed demolition of the buildings on the application site will have no effect on the setting or significance of any designated or non-designated heritage assets in the vicinity, including the closest locally listed buildings known as 19 Lebanon Park, 1-7 and 9-19 Ferry Road, and 13 and 14 Sion Road. The GPA3 exercise in Appendix 2 confirms that the proposed new development will, similarly, have no effect on the significance of any nearby heritage assets. There may be an abstract change within their wider surroundings, but this will be beneficial in that it will improve the surroundings of those assets.

Effect on Twickenham Riverside Conservation Area

- 4.4** The checklist in Appendix 3 confirms that the building subject to the present proposal does not make a sufficient contribution to the character or appearance of Twickenham Riverside Conservation Area for there to be a presumption in favour of its preservation. Given that there is an architect-designed replacement of quality, as explained in the Design and Access Statement and in other documents supporting this planning application, there is no heritage objection to the redevelopment.

Summary of effects

- 4.5** The proposal will enhance the character and appearance of Twickenham Riverside Conservation Area, and it will preserve the setting and significance of all nearby heritage assets. There is no heritage objection, and there is enhancement for the purposes of the council's duty under section 72(1) of the Act.

5. Conclusions

- 5.1** Twickenham Riverside Conservation Area is of special architectural and historic interest and of at least regional significance. It contains a number of designated heritage assets which are of special interest in their own right, including 3-12 Sion Road (grade II*) and York House RPG (grade II). Numbers 19 Lebanon Park, 1-7 and 9-19 Ferry Road, and 13 and 14 Sion Road, are locally listed, and are regarded as non-designated heritage assets). The locally listed buildings form a loose-knit group, which has a shared setting within the wider context of the designated heritage assets.
- 5.2** The proposed development involves the complete removal of a group of redundant garages (and a first floor flat-roofed residential building), dating partly to c.1935 and partly after the Second World War. In their place will be constructed five new dwellings with much improved landscaping and amenity.
- 5.3** The proposal will enhance the character and appearance of Twickenham Riverside Conservation Area, and it will preserve the setting and significance of all nearby heritage assets. There is no heritage objection, and there is enhancement for the purposes of the council's duty under section 72(1) of the Act.

Appendix 1

Scale of Harm

Scale of Harm	
Total Loss	Total removal of the significance of the designated heritage asset.
Substantial Harm	Serious harm that would drain away or vitiate the significance of the designated heritage asset
Less than Substantial Harm	High level harm that could be serious, but not so serious as to vitiate or drain away the significance of the designated heritage asset.
	Medium level harm, not necessarily serious to the significance of the designated heritage asset, but enough to be described as significant, noticeable, or material.
	Low level harm that does not seriously affect the significance of the designated heritage asset.

HCUK, 2019

Appendix 2

GPA3 Assessment

In assessing the effect of the proposed development on the setting and significance of designated heritage assets (3-12 Sion Road, and York House RPG) and non-designated heritage assets (19 Lebanon Park, 1-7 and 9-19 Ferry Road, and 13 and 14 Sion Road), it is relevant to consider how the following factors may or may not take effect, with particular reference to the considerations in Steps 2 and 3 of GPA3. The following analysis seeks to highlight the main relevant considerations. It should also be noted that a large number of other buildings in Lebanon Park are locally listed. These houses back onto the application site, which is largely surrounded by their gardens on the north-eastern side, and are not materially affected by the proposal.

Relevant Considerations

<i>Proximity of the development to the asset</i>	The proposed development is closest to the locally listed buildings at 13 and 14 Sion Road, and 19 Lebanon Park, but it is completely outside the visual envelope of the designated heritage assets.
<i>Proximity in relation to topography and watercourses</i>	There are no particular topographical features or watercourses to consider.
<i>Position of development in relation to key views</i>	No key views of any heritage assets are affected. Insofar as there will be a partial effect on the view of 19 Lebanon Park, the new building will be set back, and it will improve on the currently drab and uninviting side view of the garages (see Figures 14 and 15).
<i>Orientation of the development</i>	The proposed development is oriented orthogonally, in relation to Sion House.
<i>Prominence, dominance and conspicuousness</i>	The development will not be prominent, dominant or conspicuous.
<i>Competition with or distraction from the asset</i>	There will be no competition with, or distraction from, any heritage asset.
<i>Dimensions, scale, massing, proportions</i>	No aspect of the dimensions, scale, massing or proportions of the proposed development will affect any heritage asset.

<i>Visual permeability</i>	The proposed development will not be visually permeable, in itself, but views within and around Sion Court will remain much the same as at present.
<i>Materials and design</i>	Materials and design can be the subject of later approval by way of condition.
<i>Diurnal or seasonal change</i>	No issues are anticipated in respect of diurnal or seasonal change.
<i>Change to built surroundings and spaces</i>	The built surroundings of the heritage assets will be very little changed, even at an abstract level.
<i>Change to skyline, silhouette</i>	No heritage asset will be affected in terms of change to skyline or silhouette.
<i>Change to general character</i>	The change to the general character of the heritage assets will be beneficial, in that the quality of their surroundings will be improved.

Appendix 3

Checklist - Demolition

Guidance issued by Historic England on the identification of important buildings in conservation areas has been available in various forms for many years. It was originally expressed in terms of ten questions and is currently contained in a checklist of twelve questions in Table 1 of Conservation Area Designation, Appraisal and Management dated 2019.

It is generally accepted that the questions are not criteria to be met or otherwise, and that a balanced overall assessment is required with reference to the “checklist”. Historic England’s position, set out in paragraph 61 of the guidance, is that “A positive response to one or more of the following may indicate that a particular element within a conservation area makes a positive contribution, provided that its historic form and value have not been eroded”.

The twelve questions in the checklist have been answered in the table below. Although a “yes” has inevitably been recorded against some standard answers (a “no” would be difficult to record to some of the questions in any circumstances) a balanced interpretation of the result would be that there is no reason to suppose that the structures in question make a contribution to the character or appearance of the conservation area such as for there to be a presumption in favour of their preservation.

Question	Answer
<i>Is it the work of a particular architect or designer of regional or local note?</i>	No
<i>Does it have landmark quality?</i>	No
<i>Does it reflect a substantial number of other elements in the conservation area in age, style, materials, form or other characteristics?</i>	No
<i>Does it relate to adjacent designated heritage assets in age, materials or in any other historically significant way?</i>	No
<i>Does it contribute positively to the setting of adjacent designated heritage assets?</i>	No

<i>Does it contribute to the quality of recognisable spaces including exteriors or open spaces within a complex of public buildings?</i>	No
<i>Is it associated with a designed landscape, e.g. a significant wall, terracing or a garden building?</i>	No
<i>Does it individually, or as part of a group, illustrate the development of the settlement in which it stands?</i>	Yes, but any building will do this.
<i>Does it have significant historic associations with features such as the historic road layout, burgage plots, a town park or a landscape feature?</i>	No
<i>Does it have historic associations with local people or past events?</i>	No
<i>Does it reflect the traditional functional character or former uses in the area?</i>	Yes, but any building will do this.
<i>Does its use contribute to the character or appearance of the area?</i>	No

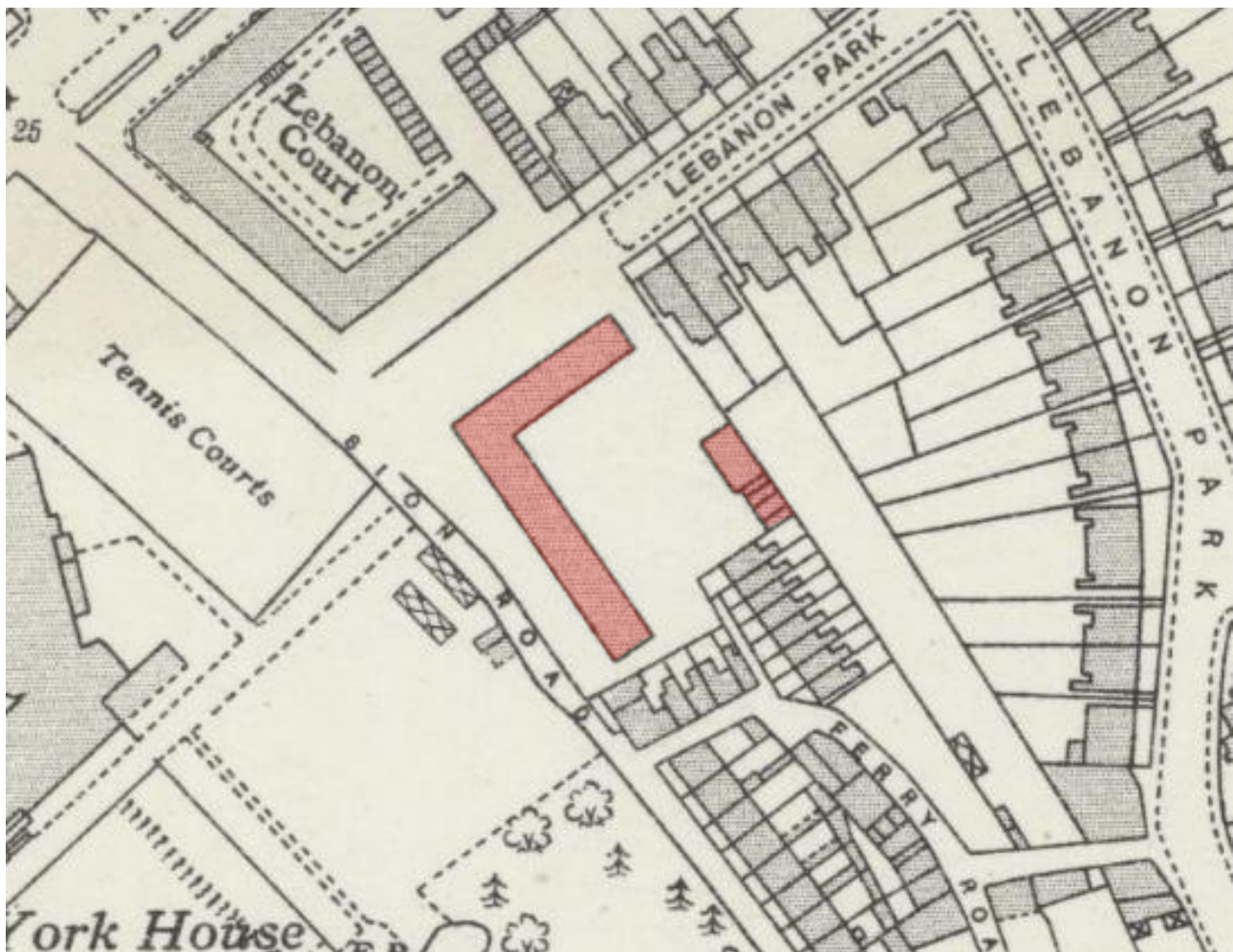


Figure 1 - Extract from the O.S. map of 1936 showing Sion Court and some buildings (possibly garages) on part of the site of the current garages, all shaded with a red wash for ease of identification. Note that the footprint of Sion Court is shown as an L-shaped block exactly at 90°, whereas the actual layout, as built, is less regular. The map edition was revised 1934-1935, so it is possible that the general outline of an emerging building, under construction at that time, was depicted. Lebanon Court was named on the map, and seems to have been more fully developed.



Figure 2 - Locations of locally listed buildings in relation to Sion Court (19 and 21 Lebanon Park, 1 to 7 and 9 to 19 Ferry Road, and 13 and 14 Sion Road).



Figure 3 - Sion Court from Sion Road.



Figure 4 - Lebanon Court (left) and Sion Court (right) looking from Sion Road into Lebanon Park.



Figure 5 - Sion Court seen from Sion Road.



Figure 6 - Looking south-east in Sion Road with Sion Court to the left and the gable wall of 14 Sion Road (locally listed) beyond.



Figure 7 - Looking south-east into Sion Road, with the gable wall of 14 Sion Road on the left. Numbers 13 and 14 are locally listed, and numbers 3-12 (further down) are listed grade II*.



Figure 8 - Looking into the site from Sion Road. Sion Court is to the left and 14 Sion Road (locally listed) is to the right.



Figure 9 - Looking into the application site from the Sion Road entrance. To the right are the locally listed buildings known as 9 and 11 Ferry Road. The garages and flat roofed first floor accommodation can be seen in the centre-left, beyond the metal staircase.



Figure 10 - Looking into the site from the Sion Road entrance. The garages and residential first floor accommodation appear on the O.S. map of 1936.



Figure 11 - The first floor residential accommodation over some of the garages. This, and the garages to the right, appears on the O.S. map of 1936.



Figure 12 - The detached group of six garages, probably dating after the Second World War.



Figure 13 - The back of Sion Court, looking towards Lebanon Park, with the two groups of garages in the foreground and to the right.



Figure 14 - Looking into the application site between 19 Lebanon Park (locally listed) and Sion Court. This is not a key view of the locally listed building, and the appearance of the garage and first floor structure within the application site is poor.



Figure 15 - A key view of 19 Lebanon Park (arrowed) in the context of other locally listed buildings of similar date to its left, and the streetscene in general. Sion Court is to the right of number 19.