

Former Hampton Police Station Hampton

Heritage Statement Addendum

July 2024



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1.0 Introduction

BHC provided a Heritage Statement (Sept 2019) for the extant consented scheme 19/2822/FUL which proposed various alterations to the locally listed building. It is now proposed to amend parts of the consented scheme via a Section 73 Application, and so an assessment of the amended design's heritage impacts is required. This Addendum to the 2019 Heritage Statement has been produced to assess the heritage impacts of the changes now proposed to that consented scheme. It should be read in conjunction with the baseline and assessment set out in the 2019 report.

The scheme's most recent evolution is described in detail in other supporting reports. With regard to the heritage issues, a site visit was carried out with the Council's conservation officer Lauren Way on 13 June 2024, following which she offered written feedback that informed further amendments. Both these comments and the amendments were discussed at the pre-application meeting which took place with the planning officer Simon Graham Smith on 20 June 2024.

2.0 Assessment of Impacts

2.1 Hampton Police Station BTM

2.1.1 Internal changes

After review of the accommodation layouts and buildability, the new proposal includes for the further removal of internal fabric. Given the building's status as a non-designated heritage asset, heritage controls would not apply to these internal works.

2.1.2 Basement

The consented scheme 19/2822/FUL included a basement underneath the rear of the building. This has now been omitted so that the non-designated heritage asset's rear ground floor will visibly stand on the ground itself, rather than above a modern flat roof and basement façade.

This change will significantly improve the appearance of the BTM in comparison to the already-consented scheme. The brick rear elevation of the asset will have a direct placement on the ground rather than the less traditional arrangement that was consented.

As mentioned above, the amended scheme was discussed at pre-application on 20 June 2024, where the planning officer welcomed the omission of the basement beneath the rear wing and confirmed that the conservation officer was happy with this from a structural perspective in relation to the BTM.

2.1.3 Revised rear elevation

The consented scheme 19/2822/FUL included the demolition of the eastern rear wing which included the cells but was of lesser architectural quality than the main frontage. This was to be replaced with a new rear wing, and an open terrace between it and the western rear wing which was partly retained despite being lower quality than the eastern wing.

The conservation officer's feedback welcomed the benefits of omitting the consented rear basement storey but queried the appropriateness of the flat rear façade that was then proposed, and suggested extending the eastern wing slightly to help modulate the facade. As a result of this feedback the design team have revised this part of the building so that the rear elevation is now split into three parts, with a central recess between a wider eastern projection and a narrower western projection. This arrangement mirrors the historic widths of the two rear wings and allows the original character of the BTM to be clearly reflected in the amended design. At the same time, the proposed brick elevations beneath slate roofs would have a much more traditional and interesting character in comparison to the consented scheme which had greater areas of glazing. There are wider benefits of this approach such as the much improved internal layout, and a much more efficient use of this part of the site.

This new amended design maintains the tripartite character of the consented rear elevation, with an improved visual relationship to the historic architecture of the BTM. There would be a reduction in the depth of the consented central recess, but this would be more than balanced

by the beneficial omission of the rear basement storey and the more appropriate architecture of the façade. It is important to note also that the additional southern part of the western rear wing which would be taken into the main body of the building is of lower value than some parts of the BTM which already have consent for removal. Furthermore, under the consented scheme the fabric of the rear of the non-designated heritage asset would be largely modern in any case.

Alongside the revised rear façade, the proposed amended scheme includes a realigned rear façade to the single storey lounge immediately east of the BTM. The new glazed façade would be aligned with the adjacent rear elevation of the BTM, to avoid the latter blocking light to the former's main window.

2.1.4 Roofscape

To enable construction of the scheme it is proposed to remove the roof during the works, prior to reinstatement. This would have benefits such as allowing works to greatly improve the environmental performance of the building which are discussed by others in this application.

The roof with its dormers and chimneystacks would be carefully dismantled and all materials including slates, bricks, etc. set aside in secure storage until they can be reinstated on the building. Where any items cannot be reused due to their condition, like-for-like replacements would be used. The existing form and material character of the roof, including features such as dormer windows and chimneystacks, would be reinstated so as to avoid harm to the established character of the BTM. Any impact would therefore be temporary, only occurring during the construction phase, and there would be no harm to the asset's appearance from these changes once the scheme is complete.

2.1.5 Overall impact on the Building of Townscape Merit

Taking into account both the minor harm and the benefits of the proposed amendments to the rear part of the BTM (which is of lesser significance than its main elevations), and the neutral effect of the like-for-like rebuilding of the roof, the impact of the proposed amendments on the asset's overall significance, compared to the consented scheme, would be positive overall albeit only to a very modest degree.

2.2 Impact on the Hampton Village Conservation Area

Since the Heritage Statement was completed in 2019 a new *Hampton Village Conservation Area Appraisal* has been adopted (20 November 2023). At the same time minor boundary revisions were made to the conservation area, but these do not affect the site nor the potential heritage impacts of the proposed development. The 2023 Appraisal defines the site as lying within Character Area 3: Station Road, which derives its main character from the later 19th century buildings along and around Station Road. The Management Plan contained with the Appraisal notes the dilution of the area's historic character due to modern development in some places, but notes the continuing historic character along most streets. It includes a number of points under the headings Problems and Pressures, and Opportunities for Enhancement. Among the latter is: "Encourage an appropriate, high quality infill development adjoining the former Police Station on Station Road." It also includes a number of recommendations in the Design Guide section.

The ground covered by the Conservation Area Appraisal (2023) is reflected in the analysis that has already been provided in the main Heritage Statement (2019).

The proposed amendments to the consented scheme 19/2822/FUL include the changes to the Building of Townscape Merit noted in 2.1 above, as well as some minor changes to the design of the new build elements on the eastern and rear parts of the site. The changes to the BTM would have a positive overall effect on its heritage value, but would not be appreciable from public parts of the conservation area. Meanwhile the design amendments to the new build would retain their existing character and so would have a neutral effect on the conservation area's character and appearance.

The overall effect of the proposals on the overall significance of the Hampton Village Conservation Area would be positive, albeit given the extensive nature of the asset any effect on its special interest as a whole would be negligible.

2.3 Impact on other heritage assets

There are a number of BTMs and listed buildings within the wider vicinity of the site. The proposed amendments to the consented scheme would have a positive effect on the site overall, but this would give rise to a negligible impact on the significance of these assets.

3.0 Legislation and Policy Assessment

3.1 Legislation

The statutory duties with regard to listed buildings and conservation areas remain as set out in the Heritage Statement (2019). The Council remains able to comply with these duties whilst granting consent to the present application.

3.2 National Policy

The National Planning Policy Framework was last updated in December 2023 and the numbering of the most relevant paragraphs with regard to heritage assets is now 200-209. However despite this change their wording remains reflective of the paragraphs assessed in the 2019 Heritage Statement.

With regard to the Hampton Police Station Building of Townscape Merit the proposed amendments would have a modest positive impact on significance in comparison to the consented scheme. With regard to indirect impacts on the settings of other BTMs nearby there would be a negligible change compared to the consented scheme. Therefore the scheme would be acceptable in terms of paragraph 209.

With regard to the Hampton Village Conservation Area the proposed amendments would have a positive but negligible effect on its significance, compared to the consented scheme. With regard to the settings of listed buildings nearby, there would be a negligible effect. Therefore the scheme would be acceptable in terms of paragraph 208.

It should also be noted that there are non-heritage public benefits of the current proposals, which are covered by other consultants and further contribute to the planning balance.

3.3 Local Policy

The adopted Local Plan (July 2018) still applies and is the one assessed in the 2019 Heritage Statement.

With regard to these local policies the proposed amendments, when compared to the consented scheme, would as noted above have a modestly positive or negligible impact on the various heritage assets nearby.

4.0 Conclusion

The proposed amendments to the less significant rear parts of the Hampton Police Station Building of Townscape Merit would have some effect on its overall significance. The reduction in size of the recessed portion of the rear façade and the loss of small areas of fabric would cause some harm, but this would be more than outweighed by the benefits of the improved elevational design and the omission of the previously consented rear basement. Other amendments would have a neutral heritage impact. At the same time, the amended scheme would also deliver non-heritage public benefits which would weigh in its favour as noted elsewhere by other consultants.

With regard to statutory controls, national planning policy and the London Borough of Richmond-upon-Thames's local policies, the proposed amendments would form a slight improvement on the previously consented scheme.

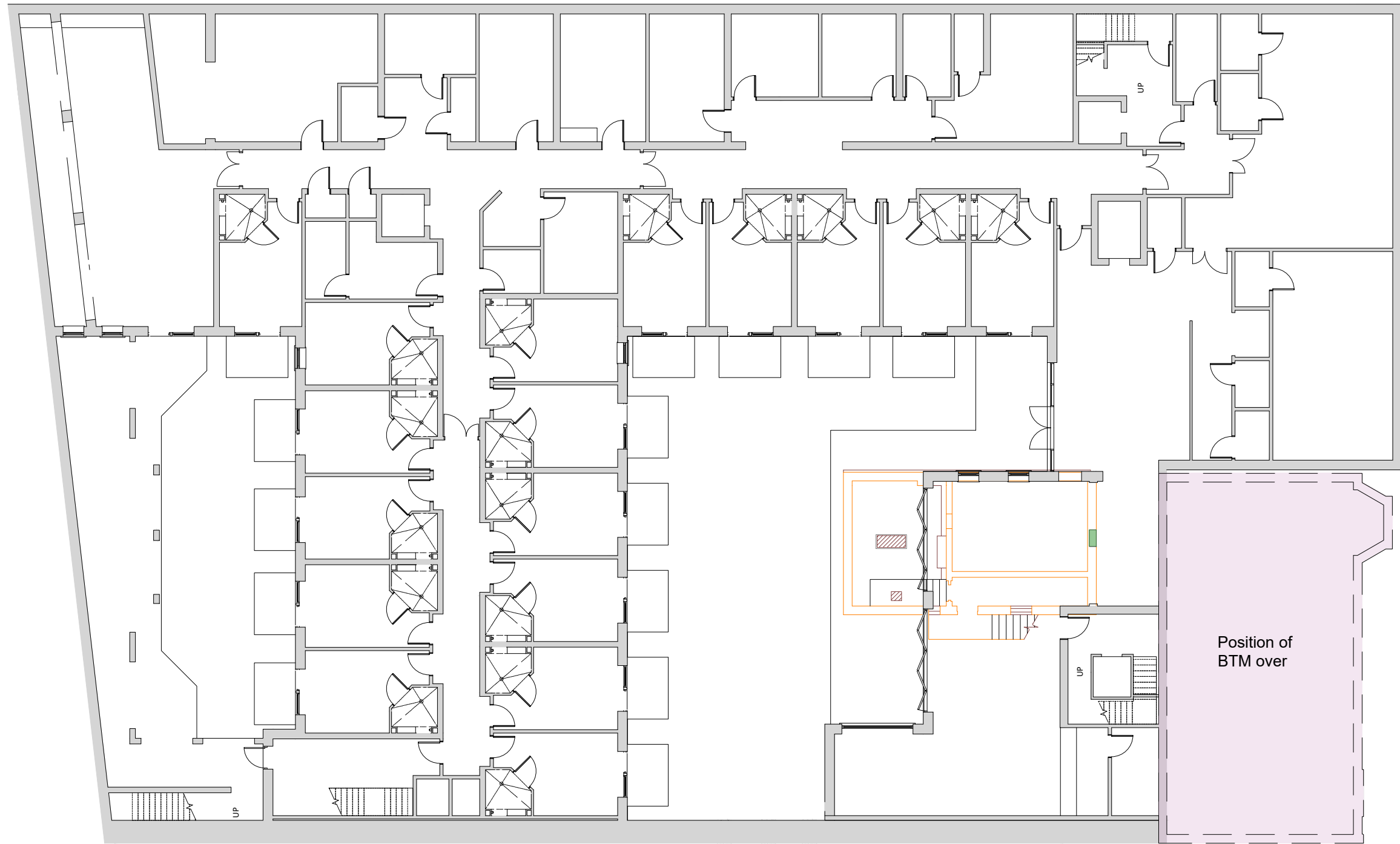
Appendix 1

Consented Scheme

19/2822/FUL – consented scheme:

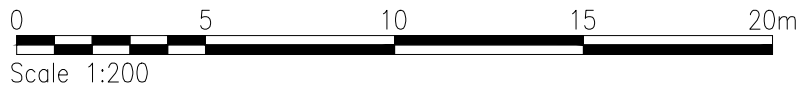
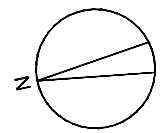
Drawing showing Demolition and Retention of the Locally Listed Building on the lower
ground floor.

(No drawings submitted for other floors)



KEY

- Existing building - walls demolished
- Proposed new walls
- Existing walls retained



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Revisions:
P2 Updates to align with revised scheme
P3 Plan rotated on sheet
P4 Position of BTM over added

Drawn/Chkd: Date:
AM 18.11.19
AM 27.11.19
AM 20.12.19

Client:
 Cinnamon

Project:
 Station Road, Hampton

Drawing Title:
 LLB demolition / retention
 Lower Ground Floor Level

Scale @ A3: 1:200
 Checked by: -
 Date: 24.10.19

Job No: 11045
 Stage: PL
 Drawing No: 901
 Rev: P4

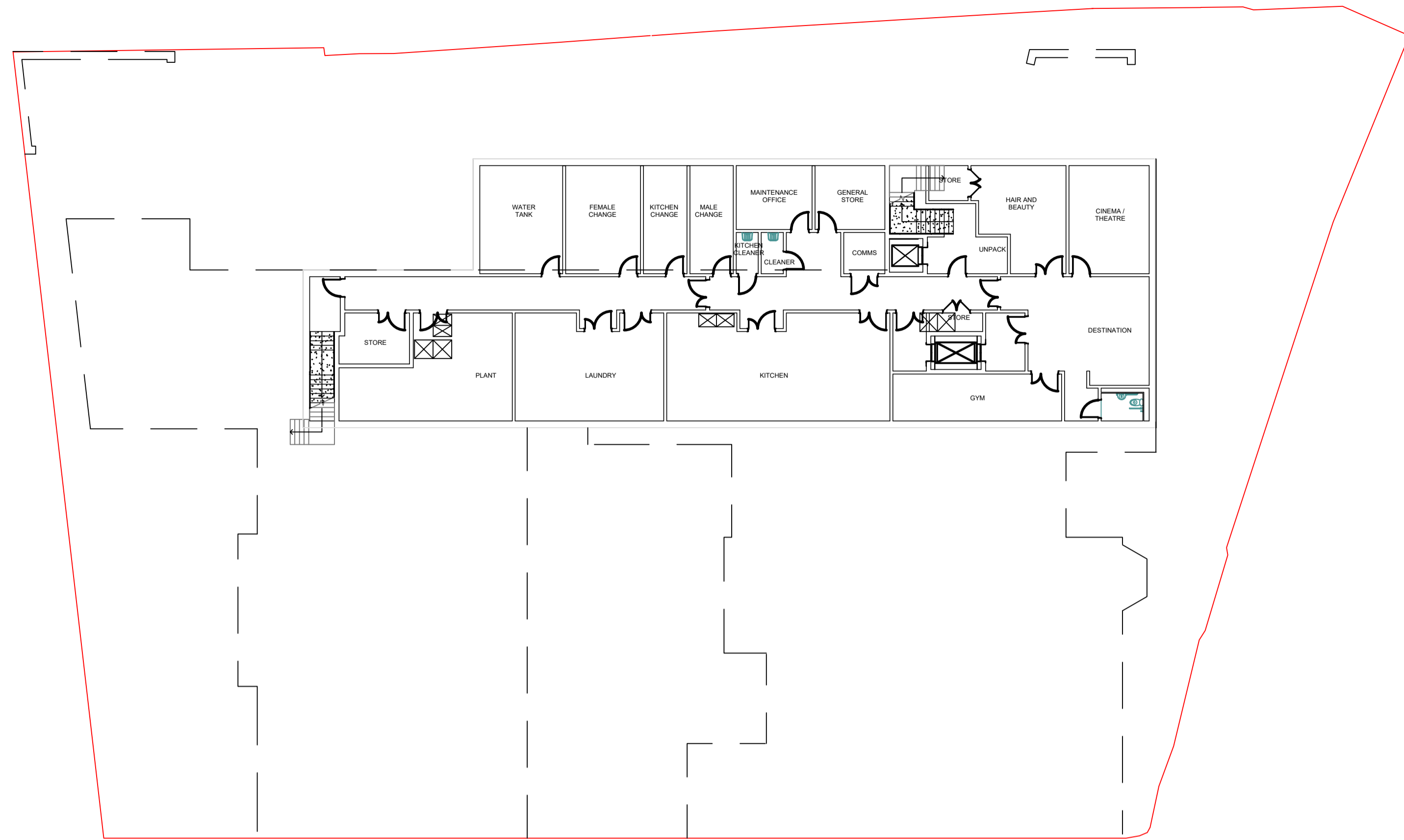
Construction Preliminary Information
 Approval Tender

PRC Architecture & Planning



Appendix 2 Proposed Scheme

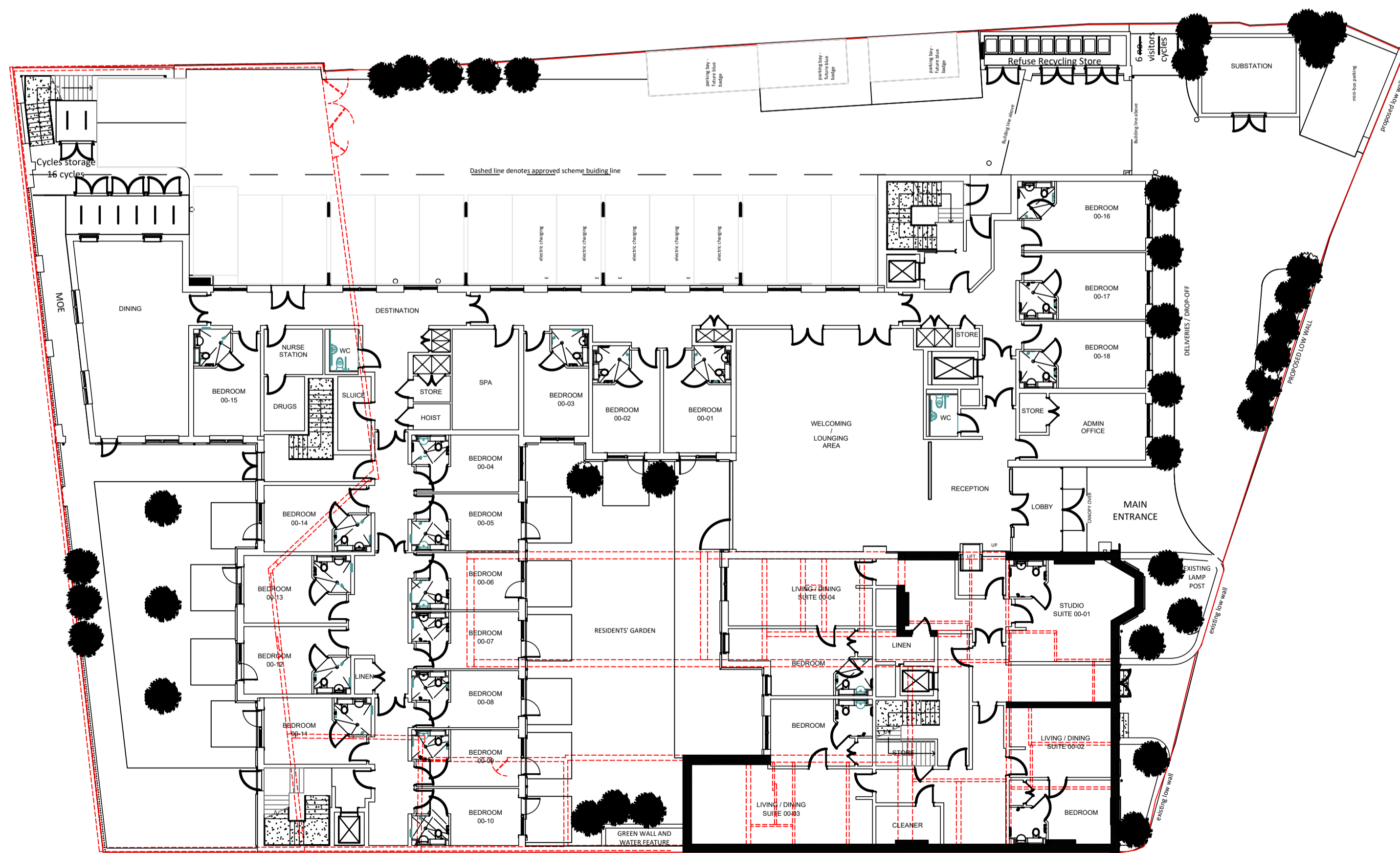
Drawings showing walls to be demolished in the Locally Listed Building (all floors).



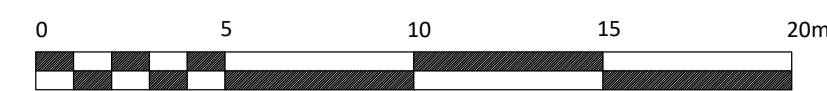
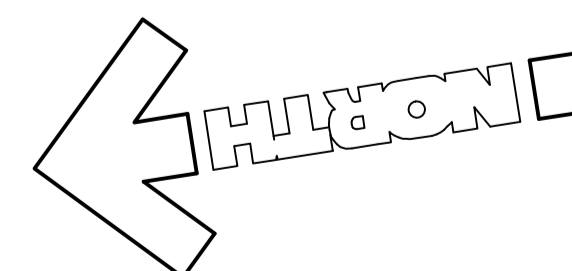
BASEMENT FLOOR PLAN

KEY:

- - - - - EXISTING BUILDING - WALLS DEMOLISHED
- EXISTING BUILDING - WALLS RETAINED



GROUND FLOOR PLAN



P5	ISSUED FOR SECTION 73 APPLICATION	PK	GP	16.07.24
Rev.	Description	Author	Checked	Date

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Client
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Project
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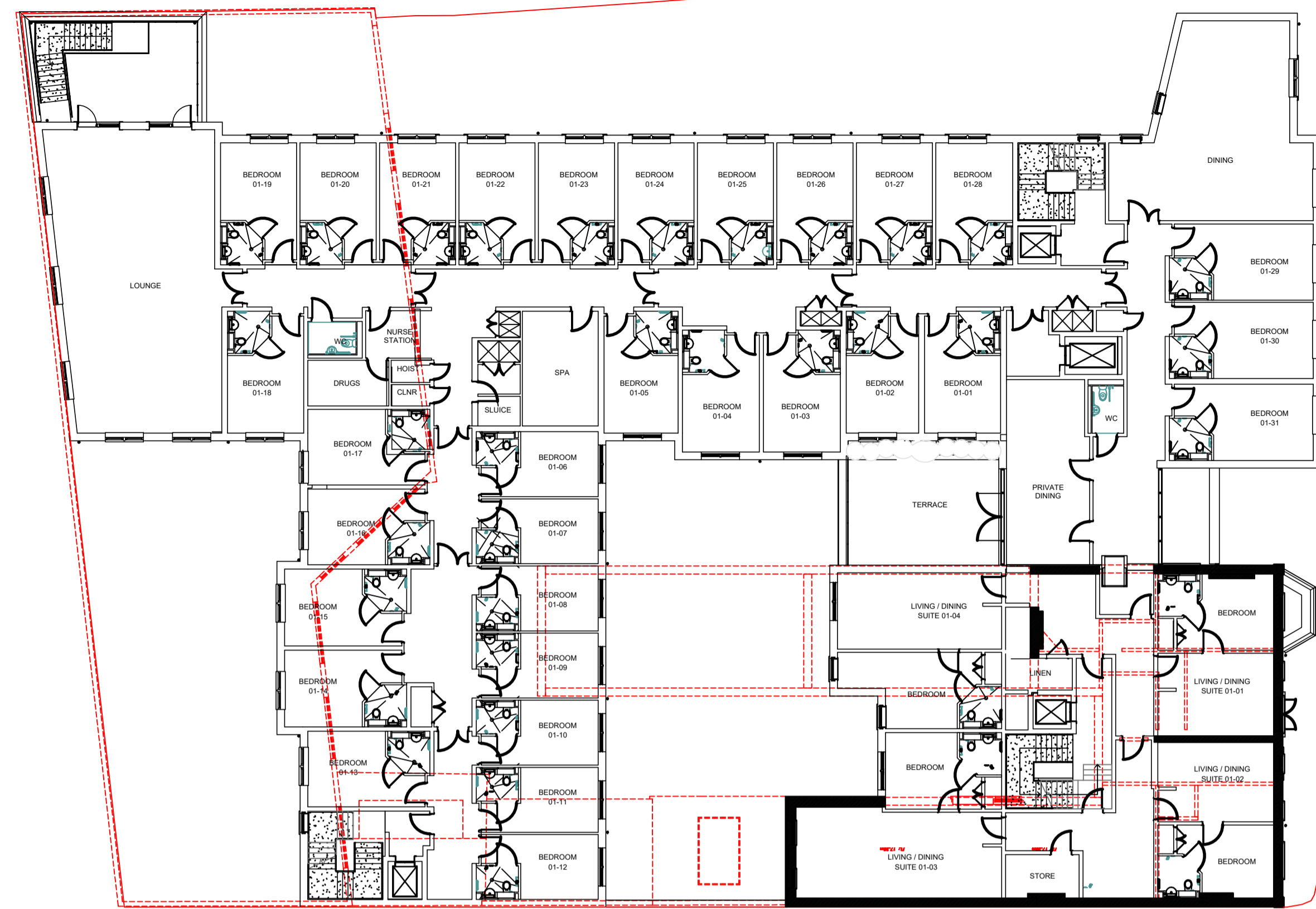
Title
PROPOSED DEMOLITION PLANS
BASEMENT AND GROUND FLOOR

C+A no.
A-1028

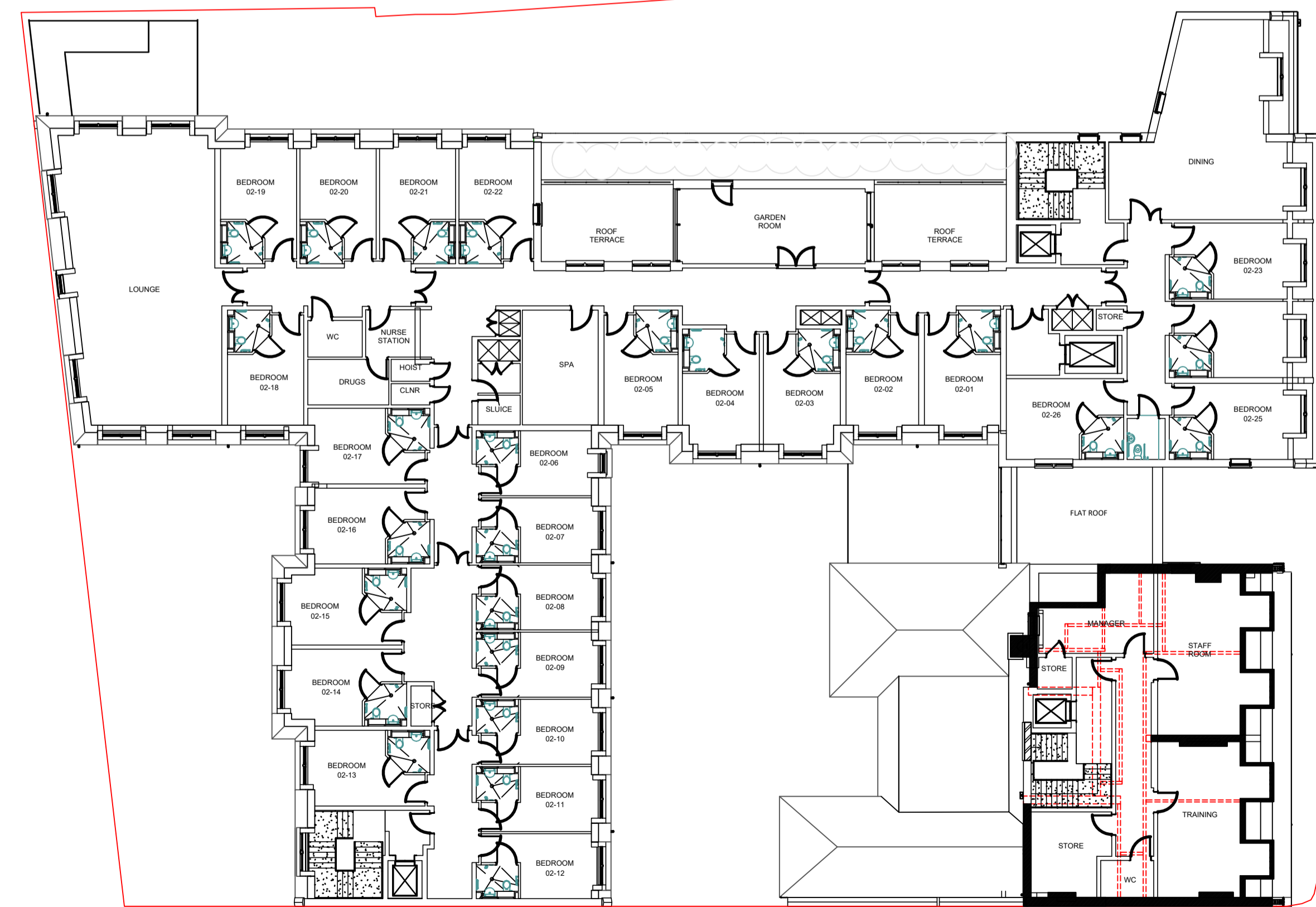
scale 1:200 author MD chkd PK date Jul. 16, 24 sheet size A1

project	org.	zone	level	type	role	class	num.	status	rev.
A-1028	CA	01			A		904		P5

For construction purposes dimensions shall not be scaled & figured dimensions must be verified on site before work commences.
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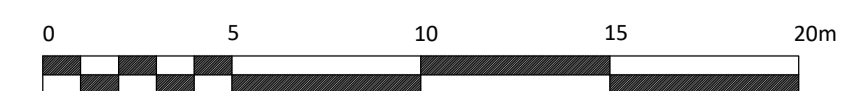
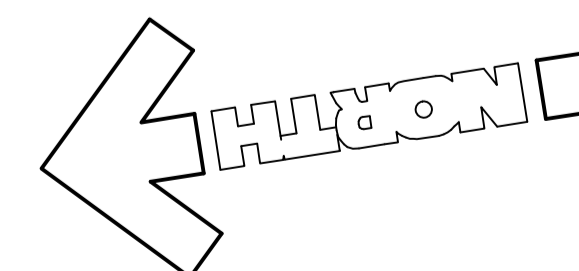
FIRST FLOOR PLAN



SECOND FLOOR PLAN

KEY:

- - - - - EXISTING BUILDING - WALLS DEMOLISHED
- EXISTING BUILDING - WALLS RETAINED



P1	ISSUED FOR SECTION 73 APPLICATION	PK	GP	16.07.24
Rev.	Description	Author	Checked	Date

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Client
CINNAMON LUXURY CARE

Project
POLICE STATION, HAMPTON

Title
PROPOSED DEMOLITION PLANS
FIRST AND SECOND FLOOR

C+A no.
A-1028

scale	1:200	author	MD	chk'd	PK	date	Jul. 16, 24	sheet size	A1
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project	org.	zone.	level.	type.	role.	class.	num.	status.	rev.
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Appendix 3 Previous Heritage Statement

Hampton Police Station Station Road Hampton Heritage Statement

September 2019



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Hampton Police Station

Station Road

Hampton

Heritage Statement

September 2019

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1.0 Introduction

The former Hampton Police Station site consists of a large plot on Station Road, comprising a 1905 Metropolitan Police Station and large modern car park at the front, and a series of 20th century extensions and garage structures to the rear. The 1905 building is designated as a Building of Townscape Merit by the London Borough of Richmond, and it makes a positive contribution to the character and appearance of the Hampton Village Conservation area.

Following the end of Police use, it is now proposed to convert the site to use as a residential care home. This will involve replacing the buildings on the rear of the site and the rear parts of the police station, and building on the car park frontage to Station Road. This Heritage Statement has informed the development of proposals and now sets out an assessment of the scheme's effects upon the heritage interest of the Building of Townscape Merit, and the role both it and the wider site play within the conservation area and the settings of nearby listed buildings, in view of the relevant national and local authority heritage policies.

This statement has been written by James Weeks, based on a site visit and desk-based research in May 2015, and updated to reflect new circumstances in July and August 2019.

2.0 Understanding

2.1 Historical development of the neighbourhood

Early history

Hampton has existed since at least the Anglo-Saxon period, occupying a strategic location by a long-established ferry crossing. The village developed in two main ways: east-west along the river frontage, and north-south along the High Street that led into Middlesex. The church close to the river formed the original core of the village, but the concentration of industrial and commercial activities along the river, and the expansion of the northern part of the village, led the community's focus to shift progressively to the junction of Church Street and the High Street.

1700-1850

What is now Station Road was originally a rural lane called New Street. Probably starting in the early 18th century, small groups of houses were built at several points along the road, mostly in short terraces. Only a few survive today, including 40-54 Station Road just east of the site. Another group of houses formerly occupied the street frontage of the present Police car park.

1850-1880

The local area changed considerably from the mid 19th century. Starting in 1855 the Southwark and Vauxhall Water Company built the Hampton Waterworks on a large site along the riverside to the west of the village. This originally consisted of a fine group of monumental gault brick pumping stations along the south side of the Upper Sunbury Road, with nearby filter beds, but it expanded considerably over the ensuing decades. Then in 1864 the London & South Western Railway opened, curving south-westwards some distance to the west of the village centre. With the establishment of Hampton Station the old New Street became known as Station Road.

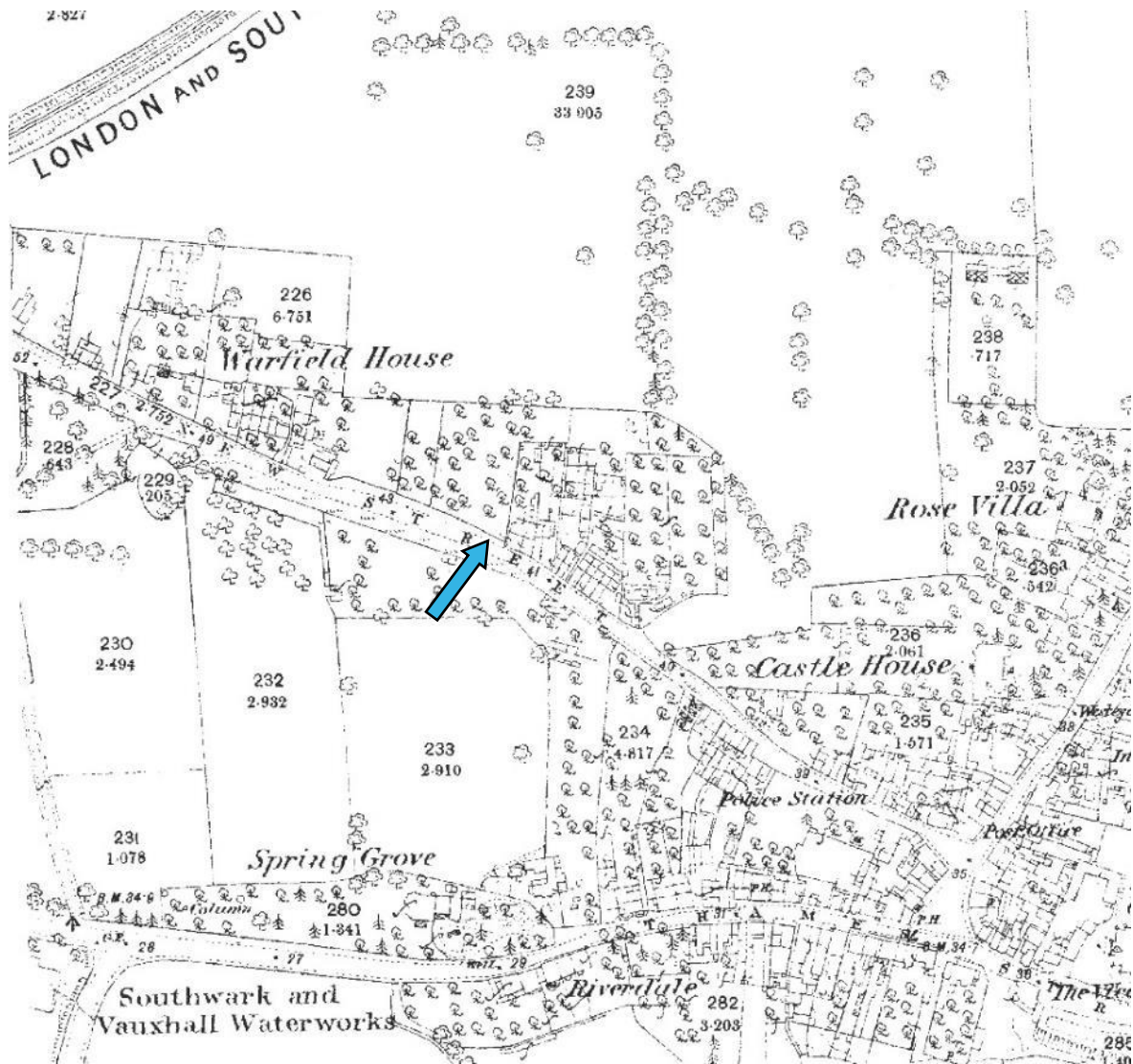
The changes during the later periods are best summarised by the historic maps below.

1880 OS map

The neighbourhood circa 1880 was beginning to develop from the rather rural and linear village into the suburb we see today. The arrival of the railway had made residential and commercial development more likely, but this did not lead initially to great amounts of building since Hampton was still some way outside London's urban sprawl.

The 1880s OS map shows the dense dwellings and industrial buildings along the riverside, as well as the small village houses along the High Street and Thames Street, with the early developments occupying some of the frontages along Station Road (New Street). Nevertheless, most of the neighbourhood around the site was still open fields at this time, some with orchards. Amidst these fields were several larger villas such as Spring Grove in the south and Warfield House to the west of our site. Meanwhile to the west of Warfield House was a village green.

Notable on the 1880s map is the location of the previous Police Station, near the eastern end of Station Road.



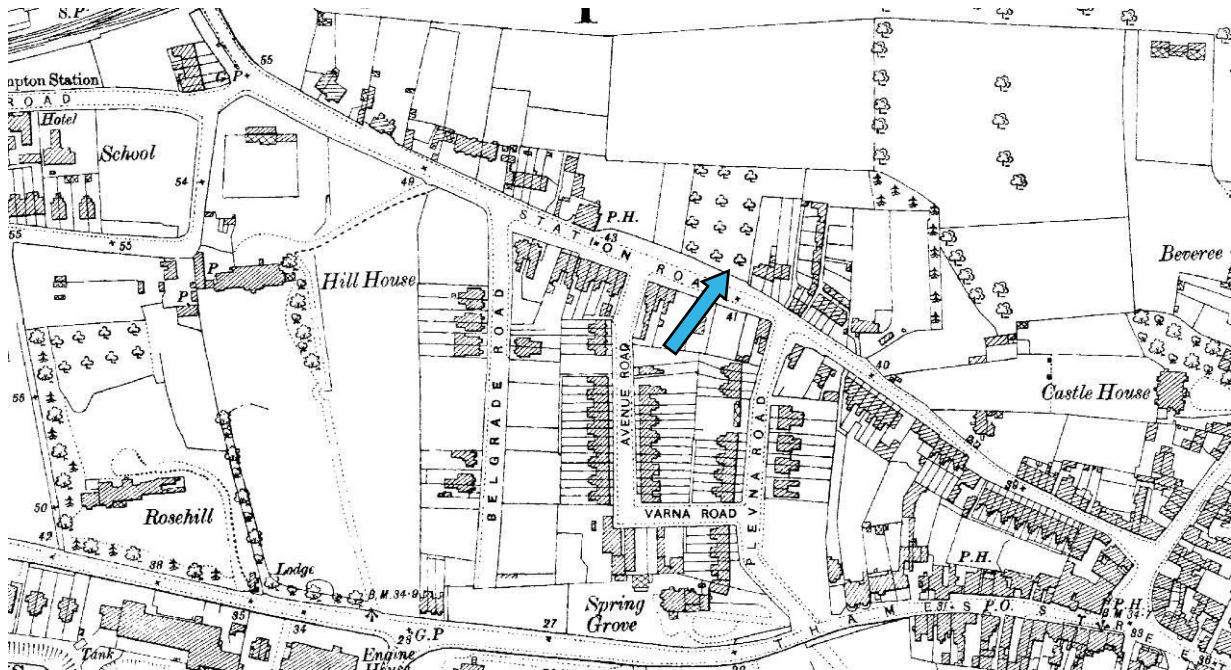
The Ordnance Survey from circa 1880, showing the largely rural nature of the neighbourhood. The future site of the Police Station is shown by the blue arrow.



The original Hampton Police Station at 12 Station Road, probably around 1900 (Richmond Local Studies)

1897 OS map

This map shows the rapid spread of residential development over the fields south of Station Road, with the creation of Belgrade, Avenue, Varna and Plevna Roads over the preceding decade and a half. These developments were typical outer London suburbia of the time: stock brick terraces and semi-detached houses with decorative brick or stone mouldings.



The Ordnance Survey from 1897, showing the new streets built south of Station Road. The future site of the Police Station is shown by the blue arrow.

1914 OS map

During the Edwardian period the fields north of Station Road began to be developed with housing, including the short street of Warfield Road laid out on the former site of Warfield House. New dwellings and shops were laid out on the north side of Station Road opposite the slightly earlier shops on the south side. The present Police Station was built in 1905 between these new shops and the much older terrace of houses directly to the east.

Another major change was the replacement of Hill House and its large garden with a large area of new filter beds for the Hampton Waterworks. These diminished the attractiveness of the west end of Station Road for the next century.

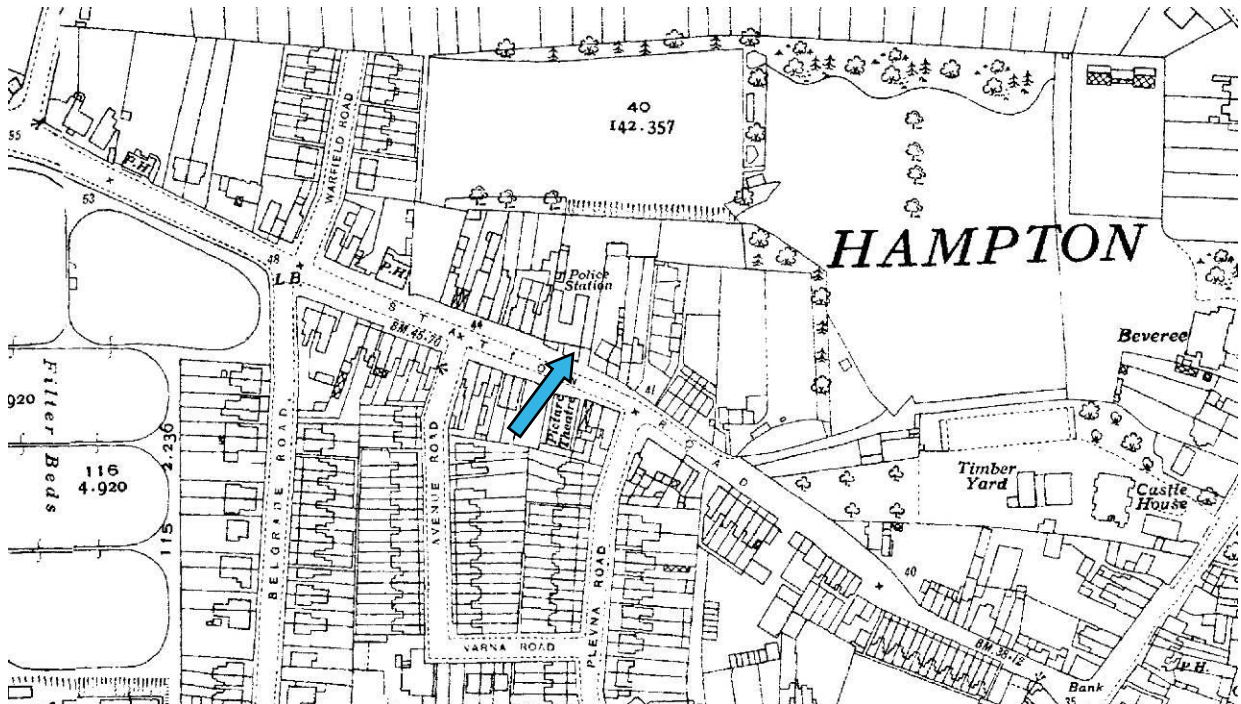
North of the site, the Beveree Recreation Ground appears to have become established by this date.



The Ordnance Survey from 1914, showing further new streets appearing north of Station Road, further development on the streets to the south, the new filter beds to the west, and the new Police Station marked by the blue arrow.

1934 OS map

By the interwar period the street layout in the area had been completed, and only modest development took place on the leftover plots.



The Ordnance Survey from 1934, showing the pace of development tailing off, with only a few new buildings erected on the remaining vacant plots.

1957 OS map

In the middle decades of the 20th century there was little new development. Most notable was the expansion of the timber yard and joinery works near the east end of Station Road, and the creation of a large new garage to the rear of the Police Station in 1935.



The Ordnance Survey from 1957: note the new garage behind the Police Station, and the joinery works.

1968 OS map

10 years further on, the scene has changed through the demolition of the short terrace of historic houses to the east of the Police Station, to create a larger car park, and the erection of modern blocks of flats behind the terrace to the east.



The Ordnance Survey from 1968, showing the new streets built south of Station Road. The future site of the Police Station is shown by the blue arrow.

2014

Since the late 1960s there has been some redevelopment at the east end of Station Road, but most of the historic houses have remained intact. The most important change has been the removal of the filter beds at the west end of the road in the last few years, and their replacement with a new village green and a development of houses.

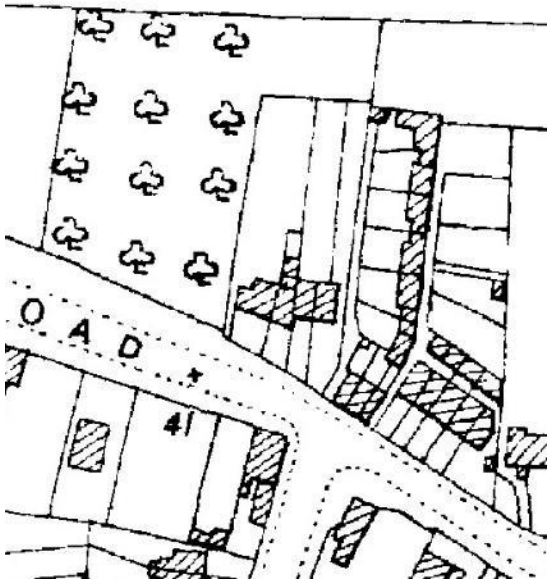


Aerial photo circa 2014. The site of the Police Station is shown by the blue arrow.

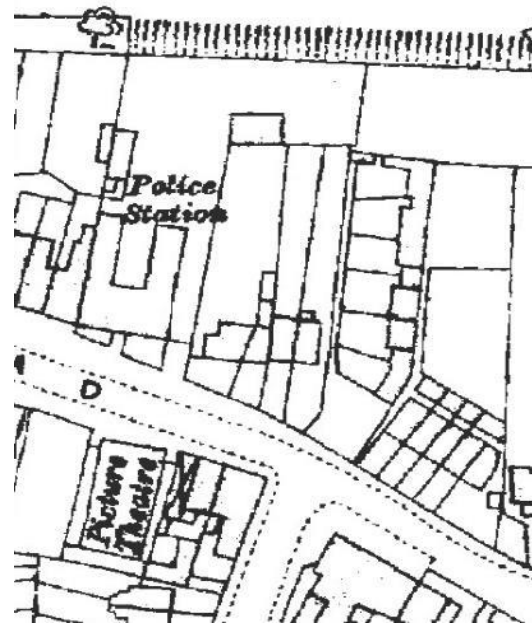
2.2 Historical development of the site

2.2.1 Before the Police Station

The site was previously occupied by a field and orchard, next to a short irregular terrace of houses that might have dated from the early 18th century. Due to the expansion of the population in the outer Metropolitan Police area during the later 19th century, the old Police Station at 12 Station Road was considered too small, and the present site was acquired to allow the construction of a suitable new building. The present Police Station was begun in 1905, and in common with other Metropolitan Police buildings of the time it appears to have been designed by John Dixon Butler, who held the post of Surveyor from 1895 until his death in 1920.



The orchard on the site in the 1897 OS map



The new Police Station on the 1914 OS map

2.2.2 The original building

Exterior

Butler is noted for his well-mannered approach to the street facades of his buildings, through which he was able to give the Metropolitan Police a coherent visual identity by the coordinated use of high quality bricks and Portland stone, with good craftsmanship. Hampton Police Station fits this pattern and offers a well-composed façade to Station Road, which uses an eclectic combination of classical elements and Arts & Crafts sensibility to give a suitably formal appearance, while being sensitive to its suburban location. The public entrance is emphasised by a grander stone doorcase with 'POLICE' inscribed above, and the public office is lit by a large bay window; meanwhile the neighbouring staff entrance is much smaller.

The low front walls capped with Portland stone copings, and the grand corner lamp standard on a Portland stone plinth, were also integral parts of the original design. They reflect Butler's conviction that police buildings should play a suitably respectable role within their surroundings, to help project an image of natural authority. Much more modest are the two square gate piers flanking the vehicle entrance, which are mostly of plain glazed brick to allow easy cleaning, but then have Portland stone and red brick caps to add a degree of visual interest.

The front part of the side elevation is carried out in the same manner as the main façade, albeit with a much less formal composition. It received this level of care as originally it would have been the only part of the east side that was easily visible from the street. It therefore needed to offer a relatively polite frontage to the narrow access road leading to the rear of the site. The main visual element of this façade is the large gable with its oeuil-de-boeuf window and moulded copings, set off once again with prestigious Portland stone.

The 1914 OS map shows that the original building was probably built with two short rear wings behind the main front block. These were detailed plainly as they were not publicly visible and had relatively humble uses. The flank wall facing the vehicle access was faced in red bricks of a lesser quality than the front façade, but maintaining the same colour. The other rear walls were, however, faced in cheap yellow stock bricks for the sake of economy.

Aside from the main building there was a brick lean-to shed set against the west boundary wall of the site, with a monopitch slate roof. This building had three door openings on its east wall and was used in the 1950s for housing lockers. Its original use is unknown. It survives in altered form today. Another shed was recorded in the rear part of the site to the north east of the original main building, but this has long been lost.



The front façade of the 1905 building.



The rear of the 1905 building, with the later extension on the left.

Interior

The interiors of the original building appear always to have been very simple and plain, in common with most police stations of the period. The emphasis was on a grand frontage that reassured local people, whilst the internal offices were intentionally plain and robust, to minimise any expense on fit-out and ongoing repairs. It is likely that the public entrance led into a space that had a degree of quality – albeit of a modest kind – however, any original entrance partitions or public counters have long been removed, leaving a plain herringbone wood floor as the only feature. The staircase, which is sometimes of some interest in these kinds of building, is exceptionally plain with treads and iron railings of the most utilitarian kind.

Within many of the rooms there are a number of surviving picture rails and moulded architraves, as well as severely plain boarded skirtings and several plain doors. The ground floor of the eastern rear wing has some rooms with utilitarian glazed brick walls and one cell door. The first floor of this wing has the one surviving fireplace: a plain stepped timber surround with a buff terrazzo insert. There must originally have been many others but these have disappeared.

The following photographs show the general character of the interiors. The original layout may have been similar to that shown on the 1957 plans reproduced later in this report.



A typical room with modern suspended ceiling, fire door, service trunking, etc.



A plain original door within a much-altered room on the ground floor.



The main public entrance showing its modern interior character.



The plain main staircase



The plain upper staircase



The sole remaining fireplace, in the rear wing.

2.2.3 Later changes

The Police Station building

The historic maps show the broad phases of extension that the main building underwent during the 20th century, and a set of plans from 1957 provides additional information. These show that the following main changes occurred:

1914-34

- Addition of a small lean-to structure north of the rear brick shed (since demolished).

1936

- Extension of the eastern rear wing and creation of an external concrete access deck cantilevered from the courtyard wall.
- (Probably at this time) remodelling of the boiler room beneath the original eastern rear range.
- Addition of an external toilet block linking the western rear range to the older brick lean-to.

These new structures were carried out in red and yellow stock brick, were utilitarian in character, and were distinguished further from the older fabric by flat roofs instead of slate pitches. In addition there have also been some small-scale alterations over time, including the remodelling of what is now the external doorway to the ladies lavatories in the western range, and the rendering of the central part of the east façade's ground floor.



The east façade, showing the transition from the well-detailed gable by the road (left), to the plain rear wing (centre) and the 1930s flat-roofed extension (right).



The 1930s extension from the rear



The 1930s link block (left) and the much-altered brick shed (right) of the western rear wing.

Numerous alterations have also taken place to the interiors of the original Police Station, although it is much less certain when these occurred. The changes include:

- the removal of original fireplaces (except for one in the eastern rear wing);
- the removal of most original doors;
- the removal of original features in the entrance hall, and insertion of a modern glazed partition;
- the insertion of modern suspended ceilings in most rooms;
- the insertion of new services including modern radiators and trunking routes;
- the insertion of modern partition walls in several areas;
- the removal or replacement of original fixtures and fittings.

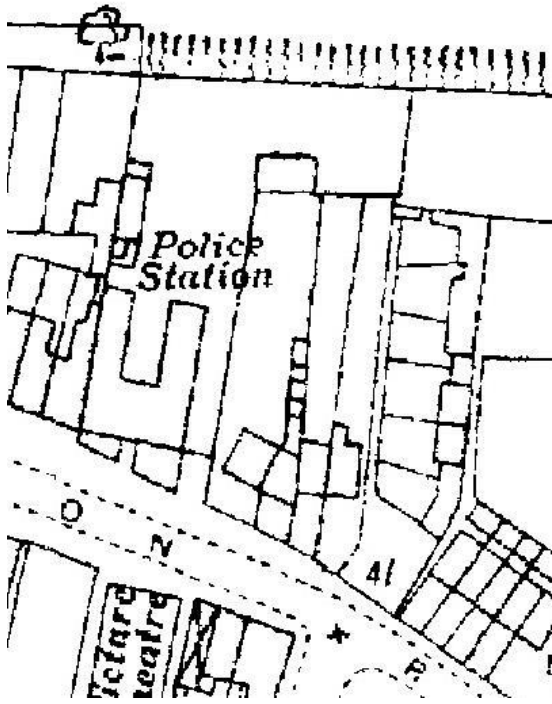
The 1957 plans

The plans in Appendix 1 show the layout of the buildings in 1957, together with some of the room uses.

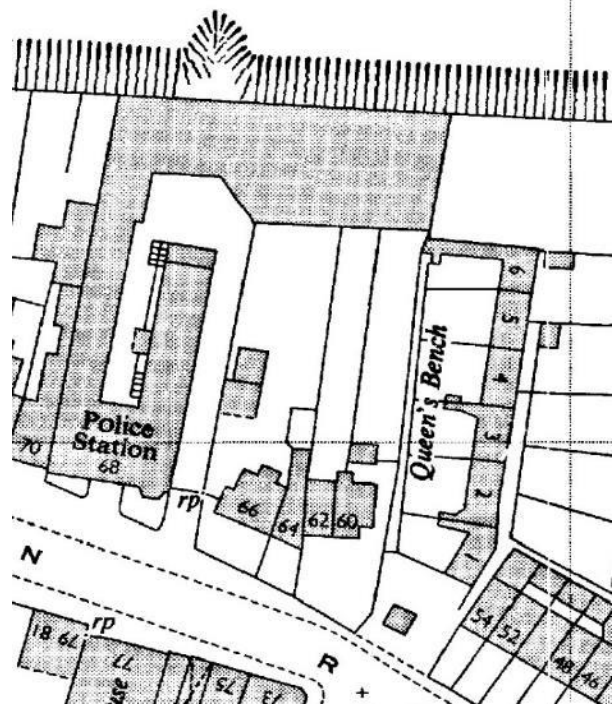
The rest of the site

The rear part of the site was greatly altered in (probably) 1936 through the construction of a large new two-storey garage across the entire north side of the compound. This was linked back the western rear range of the Police Station by single-storey sheds. The new building had an expressed concrete frame infilled with Fletton bricks, and topped by low pitched roofs lit by skylights. It has an entirely utilitarian character.

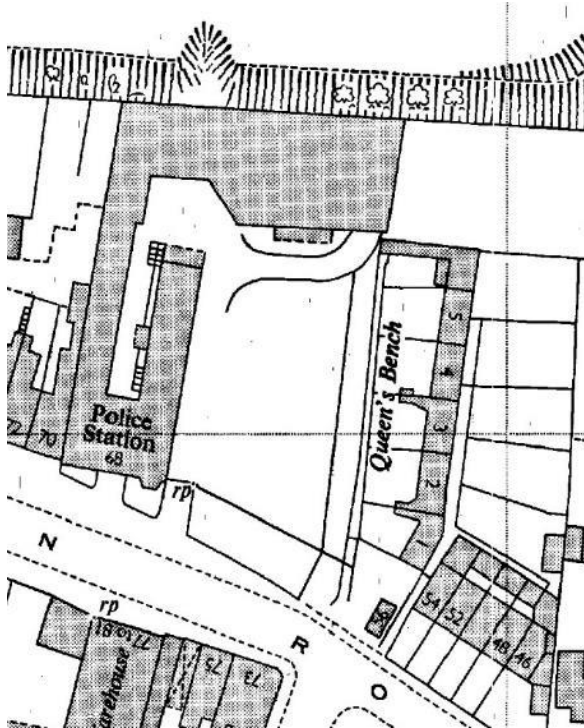
Further changes occurred between 1957 and 1968 through the demolition of the old houses to the east of the Police Station to create a large new car park. This was given a tall new brick wall to prevent public views from Station Road. Meanwhile to the rear a new concrete access ramp was built to the second floor of the garage building.



The small rear addition to the brick lean-to shed is shown on the 1934 OS map.



The large rear extension of the eastern rear wing is shown on the 1957 map, alongside the large new garage building.



The new car park on the site of former houses, and the new access ramp, are both shown on the 1968 map.



The 1930s sheds and garages in the north west corner of the site.



The 1930s garage and postwar ramp at the rear of the site.



The interior of the 1930s garage



View of the postwar car park and front boundary wall from the top floor of the Police Station. Note the 1960s flat blocks (top left) set behind the Grade II listed 18th century houses (top right).

2.3 The Conservation Area

Hampton Village Conservation Area was designated in 1969 to protect the character and appearance of the historic village core and river frontage. The area originally extended along the river from Ash Island to the western edge of the old village, and northwards along Church Street and High Street up to Hampton Pool.

Station Road was not included within the conservation area until 1982, when the area up to Belgrade Road was incorporated. The Conservation Area Statement notes that this was done to protect the character of Station Road as ‘an attractive tree lined street with strong village character’. Several buildings outside Hampton Pool, and part of Upper Sunbury Road, were also brought into the conservation area at this time.

In 1991 the conservation area was further extended to take in the Beveree Recreation Ground to the north of Station Road, and the area to the west of Belgrade Road including the filter beds of the Hampton Waterworks. This was done in order to protect the existing open spaces, and to guide potential redevelopment of the filter beds to ensure that the character of the area was maintained.

Issues and Opportunities

The Conservation Area Statement notes various ‘Problems and Pressures’ including:

- Loss of traditional architectural features and materials due to unsympathetic alterations;
- Loss of front boundary treatments and front gardens for car parking;
- Lack of coordination and poor quality of street furniture and flooring.

It also notes the following relevant ‘Opportunities for Enhancement’:

- Preservation, enhancement and reinstatement of architectural quality and unity;
- Retain and enhance front boundary treatments and discourage increase in the amount of hard surfacing in front gardens;
- Coordination of colour and design and improvement in quality of street furniture and flooring.



The historic core of the village, along the High Street.



Modern housing along the High Street.



The east end of Station Road, showing the 19th century terrace houses opposite a modern development.



Station Road looking west: areas of informal character with breaks in the street line and architectural variety.



Plevna Road, opposite the site: a typical late Victorian residential street.



View of the listed 18th century houses at 40-54 Station Road, with the Police Station in the background.



The character of Station Road just west of the Police Station: Victorian and Edwardian shops and dwellings.



Modern housing and open space on the site of the old filter beds at the west end of Station Road.



Modern housing with traditional features on Johnson's Drive, off the High Street.

3.0 Significance

3.1 Introduction

The 1905 front building on the site is recognised by the London Borough of Richmond as a Building of Townscape Merit, and as a positive contributor to the character and appearance of the Hampton Village Conservation Area. In order to assess the potential impact of the proposed scheme upon the heritage interest of the site and the wider conservation area, it is necessary first to define in detail the significance of the building and of its role in the conservation area.

The following assessment of the building uses English Heritage / Historic England's *Conservation Principles* (2008), which provides tools for understanding the significance of buildings and places in relation to the following values:

- **Evidential (or archaeological)** value – the physical aspects of a building that yield evidence about its past.
- **Historical** value – the extent to which the building is associated with or illustrative of historic events or people.
- **Aesthetic (architectural / artistic)** value – includes the importance of buildings or places for their design, visual, landscape and architectural qualities.
- **Communal** value – includes the importance of buildings or places to societies and communities, including for local identity.

The assessment of the conservation area and the site's role within it draws upon the methodology outlined in Historic England's *Advice Note 1: Conservation Area Designation, Appraisal and Management* (2019). This document provides guidance on the designation, appraisal and management of conservation areas, and is mostly intended as guidance to local authorities when designating conservation areas and producing conservation area appraisals and management plans. This document outlines a number of questions which Historic England suggest should determine the interest of a potential heritage asset within a conservation area, and which inform the assessment below. These questions include:

- Is it the work of a particular architect or designer of regional or local note?
- Does it have landmark quality?
- Does it reflect a substantial number of other elements of the conservation area in age, style, materials, form or other characteristics?
- Does it relate to adjacent designated heritage assets in age, materials or any other historically significant way?
- Does it contribute positively to the setting of adjacent designated heritage assets?
- Does it contribute to the quality of recognisable spaces including exteriors or open spaces with a complex of public buildings?
- Is it associated with a designed landscape, e.g. a significant wall, terracing or a garden building?
- Does it individually, or as part of a group, illustrate the development of the settlement in

which it stands?

- Does it have significant historic association with features such as the historic road layout, burgage plots, a town park or a landscape feature?
- Does it have historic associations with local people or past events?
- Does it reflect the traditional functional character or former uses in the area?
- Does its use contribute to the character or appearance of the area?

3.2 The site

The 1905 building

The 1905 building has a moderate 'historical value', relating mostly to the way its frontage demonstrates the Metropolitan Police's suburban expansion in the early 20th century due to the growth of London, and the deliberate attempt to create a strong identity through the politeness and dignity of its architecture.

It is the 'aesthetic value' of the main frontage and side gable, together with the front boundary walls and the prominent lamp standard, which is the key aspect of the building's significance. They form good street architecture which makes a notable positive contribution to Station Road. Meanwhile the rear parts are generally utilitarian and of much less interest. The building's interiors were originally very plain, with simple mouldings throughout. They were never of more than modest aesthetic value, but have now suffered the removal of their furniture and most fixtures and fittings, so that they are of little interest.

The front block has a degree of 'communal value' as the centre of Police operations in the area throughout the 20th century. This is essentially expressed in the main frontage and side gable, as well as the front boundary treatment and prominent lamp standard.

In summary, the moderate significance of the front block, as a Building of Townscape Merit, derives primarily from its frontage and side gable. These aspects mark it out as a building that 'contributes positively and significantly to the character and appearance of an area' (Local Plan Core Strategy, 2009: definition of a Building of Townscape Merit). The rear elevations and the interiors are of relatively little interest.

The wider site

Before the development of the Police Station the site appears to have comprised a field or orchard, and there would consequently appear to be a low likelihood of significant archaeological remains existing below ground (although this is not a firm conclusion since a full desk-based assessment has not been carried out). The 'evidential value' of the extensions, outbuildings, ramp and car park appears minimal: they contain evidence of common modern construction techniques which are not of particular special interest.

The 'historical value' of the later additions is low. They show how the site was developed to respond to changes in technology and the type of work the Police carried out, but this aspect of the site's evolution is not reflected in any particular design quality.

The later ancillary structures and extensions to the rear are of little 'aesthetic value'. The large garage building, access ramp, car park and front wall arguably have a negative aesthetic value.

Townscape value and setting

The front of the building and the side gable play a notable role within the wider townscape. The rear parts of the east elevation make little contribution to the townscape value of the site, and are mostly screened from public view except from directly opposite the vehicle entrance. Meanwhile the modern brick front wall and landscaping along the street have at best a neutral impact, and in comparison to the historic houses that stood here until the 1960s they may be said to detract. The rest of the site is not visible from the surrounding townscape, and so may be said not to possess notable townscape value.

Summary of significance

The site's primary significance resides in the historical value of the front block as a suburban Metropolitan Police station, and the aesthetic value of its main façade, front side gable and roof. The flank elevations and the rear of the building have a much lesser value, while the later extensions and buildings to the rear are of little or no special interest. The large car park and front wall replaced a row of historic houses and may be said to detract from the site as a whole.

3.3 The Hampton Village Conservation Area

Special interest of the conservation area

The key special interest of the conservation area resides in the views along the river, and in the historic buildings and streets, including their characteristic plot layout, front gardens and boundary treatments, as well as their generally modest scale. There are a great variety of styles and forms of building in the conservation area; however the use of traditional materials and forms throughout gives it a pleasing character which is not unduly affected by the areas of modern housing, such as the developments along the eastern part of Station Road and on the site of the old filter beds.

Role of the site within the conservation area

The front block of the original 1905 building on the site plays a positive role within the conservation area through its high quality traditional materials and architecture, as well as its scale and relationship to the street line. However, the car park to the side plays a negative role, as it offers a hard, impermeable frontage to Station Road that is devoid of visual interest or material quality, whilst the expanse of tarmac behind is similarly out of character with its surroundings. The concrete-framed garage at the rear of the site is also a negative feature due to its excessive scale, its lack of architectural interest, and the unsympathetic character of its Fletton bricks.

In summary, the site offers considerable scope for the enhancement of the conservation area through the retention of the front block of the 1905 building, and the redevelopment of the detracting features with new buildings of more suitable materials, character, and form. In particular the reintroduction of human-scaled street buildings along Station Road has the

potential to greatly enhance the character of one of the conservation area’s main streets, as well as providing a more appropriate setting for the front of the 1905 building.



The car park between the Police Station and 40-54 Station Road presents a large gap site along this key street in the conservation area. This presents a notable opportunity for enhancement through re-establishing the building line with a suitable new development.

4.0 Legislation, Policies and Guidance

4.1 Statutory Control

Listed buildings and conservation areas are subject to the Planning (Listed Buildings and Conservation Areas) Act 1990, together with parts of the Enterprise and Regulatory Reform Act 2013 and the Housing and Planning Act 2016. Conservation area designation introduces a general control over the demolition of unlisted buildings and provides the basis for policies designed to preserve or enhance those aspects of the area's character or appearance that define its special interest. Section 72 of the 1990 Act requires that:

in considering whether to grant planning permission with respect to any buildings or other land in a conservation area, the local planning authority shall pay special attention to the desirability of preserving or enhancing the character or appearance of that area.

With regard to the setting of listed buildings, Section 66 of the Act (as amended) requires that:

In considering whether to grant planning permission or permission in principle 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.

4.2 National Heritage Policies

National heritage policy governing the application of the primary legislation is contained within section 16 of the National Planning Policy Framework (NPPF, 2019). Paragraph 189 of the NPPF requires applicants 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.

This Heritage Statement meets these requirements at an appropriate level of detail.

Other relevant sections of the NPPF include:

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

a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

c) the desirability of new development making a positive contribution to local character and distinctiveness.

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

194. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;

b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.*

195. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

a) the nature of the heritage asset prevents all reasonable uses of the site; and

b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and

c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and

d) the harm or loss is outweighed by the benefit of bringing the site back into use.

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

197. 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.

198. Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

199. Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

200. Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

201. Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

4.3 Local Heritage Policies and Guidance

The London Borough of Richmond's key heritage planning policies and guidance are contained within the planning documents set out in this section.

NB it should be noted that these policies are given weight in decision-making only insofar as they are consistent with the policies of the NPPF (as noted in paragraph 213 of the NPPF 2019).

Local Plan (July 2018)

Policy LP 1: Local Character and Design Quality:

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 colocation of uses through the layout, design and management of the site.*

All proposals, including extensions, alterations and shopfronts, will be assessed against the policies contained within a neighbourhood plan where applicable, and the advice set out in the relevant Village Planning Guidance and other SPDs relating to character and design.

Policy LP 2: Building Heights

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

1. *require buildings to make a positive contribution towards the local character, townscape and skyline, generally reflecting the prevailing building heights within the vicinity; proposals that are taller than the surrounding townscape have to be of high architectural design quality and standards, deliver public realm benefits and have a wholly positive impact on the character and quality of the area;*
2. *preserve and enhance the borough's heritage assets, their significance and their setting;*
3. *respect the local context, and where possible enhance the character of an area, through appropriate:*
 - a. *scale*
 - b. *height*
 - c. *mass*
 - d. *urban pattern*
 - e. *development grain*

- f. materials*
 - g. streetscape*
 - h. Roofscape and*
 - i. wider townscape and landscape;*
- 4. take account of climatic effects, including overshadowing, diversion of wind speeds, heat island and glare;*
 - 5. refrain from using height to express and create local landmarks; and*
 - 6. require full planning applications for any building that exceeds the prevailing building height within the wider context and setting.*

Policy LP 3: Designated Heritage Assets

- A. The Council will require development to conserve and, where possible, take opportunities to make a positive contribution to, the historic environment of the borough. Development proposals likely to adversely affect the significance of heritage assets will be assessed against the requirement to seek to avoid harm and the justification for the proposal. The significance (including the settings) of the borough's designated heritage assets, encompassing Conservation Areas, listed buildings, Scheduled Monuments as well as the Registered Historic Parks and Gardens, will be conserved and enhanced by the following means:*
 - 1. Give great weight to the conservation of the heritage asset when considering the impact of a proposed development on the significance of the asset.*
 - 2. Resist the demolition in whole, or in part, of listed building. 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 the justification for the proposal and the significance of the asset.*
 - 3. Resist the change of use of listed buildings where their significance would be harmed, 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.

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

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

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.

Policy LP 4 Non-Designated Heritage Assets

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

There will be a presumption against the demolition of Buildings of Townscape Merit.

Buildings of Townscape Merit SPD (adopted May 2015)

This document sets out designation criteria alongside the London Borough of Richmond's approach to considering proposals for alteration, extension or replacement of Buildings of Townscape Merit. It forms an updated version of the original Supplementary Planning Guidance which originated in 1984 and was adopted in September 2002, with minor updates in 2005.

The contents of the SPD appear to have been largely incorporated into the Local Plan, and so are not summarised further here.

Hampton Village Planning Guidance (Draft, March 2017)

This Supplementary Planning Document contains some relevant passages including:

4. Vision for Hampton (p.14)

The Vision is to bring together the different areas of Hampton as a vibrant, caring community with facilities to meet local needs. The characteristic local urban scale, and rural feel within its parks, green spaces and riverside, will be retained and there will be a more diverse range of shopping and high quality local schools to reinforce Hampton as a vibrant community within the Borough.

Character Area 4: Hampton Village Conservation Area (starting on p.22)

Station Road

Station Road is composed of eighteenth and nineteenth century mixed residential and commercial properties and lies adjacent to the railway station. It contains shopping, commercial and community services in a clearly defined local centre between Plevna Road and Belgrade Road. It also contains a number of shops whose frontages are worthy of retention.

Recent development along Station Road includes the modern brick built housing, separating Hampton Village Green and Sunbury Road. Comprised of two and three storey townhouses, these properties successfully incorporate traditional features, including red stock brick, white painted barge boards and decorative string courses

This section also includes various Threats and Opportunities which repeat those set out in the Conservation Area Statement, of which the relevant ones are stated above in section 2.3.

Page 52 of the SPD sets out specific development guidance for the site, as follows:

3. Hampton Traffic Unit, 60-68 Station Road (Local Plan ref. SA3)

Proposal: Appropriate land uses include business (B1), employment generating and other commercial or social and community infrastructure uses. The Building of Townscape Merit should be retained and a pedestrian link should be provided through the site.

Any development proposals would need to consider the following:

- *The conversion of the existing building duly respects its architectural character, particular in relation to its late Victorian features and retaining visual cues to its previous use as a Police Station.*

- *Respect the scale and massing of the existing building, the main retail frontage and the surrounding residential setting, of which the majority of buildings are two to three storeys.*
- *Ensure that new development respects and complements the street scene.*
- *Contemporary design elements may be appropriate where they complement the existing Victorian setting. Notable buildings to consider include the Police Station itself and the white rendered former Cinema located at 77 Station Road.*

5.0 Assessment of Impacts

5.1 Summary of heritage constraints

The key heritage constraints relating to this site are:

- The requirement for alterations to a Building of Townscape Merit to respect its significance and character, and to protect and enhance its setting;
- The requirement to respect the settings of nearby heritage assets; and
- The requirement to conserve and enhance the Hampton Village Conservation Area's character and appearance, which relates mainly to the traditional buildings of 2-4 storeys faced in brick or render with tiled roofs, arranged along residential streets, though there are also various modern infill developments.

In considering these constraints there is also the requirement in NPPF paragraph 213 for local authority policies to be given weight to the degree to which they conform to the NPPF. This is discussed where relevant below.

The discussion in this chapter is based upon the descriptions of the history, characteristics and significance of the site, conservation area and other assets set out in earlier chapters.

5.2 Previous, consented scheme (2016-17)

The planning application 16/0606/FUL was granted consent on 5 September 2017 for the partial demolition of the rear wings of the Police Station, and the demolition of the other buildings on site to allow for a residential development of 28 homes. A large part of the site was proposed to be occupied by a basement for car parking and ancillary rooms. The layout of the development followed a large U-shape, with a new building along the Station Road frontage on the other side of a mews entrance from the Police Station; rear wings ran back from both buildings and were linked by a third range across the width of the site at the back. A vehicle ramp to the proposed basement was designed to fit into the eastern end of the street frontage.

This consented scheme shows that demolition of much of the Building of Townscape Merit and alteration to its fenestration to the side and rear has already been considered acceptable, along with the creation of a 3-storey (above ground level) building on the open part of the Station Road frontage, built form up to the height of the BTM on parts of the rear of the site, and extensive basement excavation.

The consented scheme was supported by a Heritage Statement dated February 2016, which remains of interest for the present scheme also. Various points covered in that document, which were subsequently accepted by the London Borough of Richmond-upon-Thames when it granted consent, are only covered further in the assessment below insofar where directly relevant to the new scheme.

5.3 Assessment of the present scheme

Description

The proposed scheme for which pre-application advice is sought proposes the retention of the front part of the BTM and the redevelopment of the other structures with a new care home.

The Station Road frontage will include a new building of two brick storeys beneath a mansard roof, linked by a recessed two storey structure to the BTM which would allow the latter's prominent flank gable to remain visible in views westwards along the street. Road access to the rear would be at the east end. These elements are similar in form to the consented scheme 16/0606/FUL.

The proposed massing to the rear of the site includes a long range running northwards from the Station Road block beside an access road along the eastern edge of the site. The east elevation of this long range will be of two brick storeys plus a mansard. To the western elevation the basement storey will be exposed and will face onto a sunken courtyard.

Projecting westward from roughly half way along the eastern rear range would be a similarly scaled block, dividing the sunken area behind the BTM into two separate courtyards. The roof line of the new build elements would sit significantly below the ridge height of the BTM's front roof.

The Building of Townscape Merit would be reconfigured internally to accommodate the new use. Meanwhile the rearmost parts would be removed, and a new façade constructed in a traditionalist form to present an attractive face to the new rear courtyard. This would include the creation of a new basement with an elevation facing north.

The architectural style of the new build elements is understood to comprise traditional window proportions, brick elevations, and slate roofs, to suit the wider conservation area.

Assessment

The layout of the proposals would respond to the opportunities afforded by the site. The reinstatement of a building frontage along Station Road in place of the existing gap and stark boundary wall would be a notable enhancement of the conservation area. Meanwhile the buildings to the rear would for the most part stand away from the boundaries to either side, helping to maintain the sense of space within this part of the conservation area and respecting the settings of nearby listed buildings and other structures.

With regard to the massing of the new build elements the overall height above ground as perceived from surrounding streets and buildings is similar to the application 16/0606/FUL granted consent on 5 September 2017. The use of the basement excavation to provide a sunken courtyard rather than a hidden car park allows an extra habitable storey to be included, but this would not be seen from the wider conservation area, nor would it affect the settings of listed

buildings nearby. Meanwhile the roofscape of the east-west block behind the BTM would be of rather lower height than the building along this edge of the site granted consent in 2017.

The tradition-informed style and materials proposed for the new parts of the development, as described in more detail in the architect's Design & Access Statement, are intended to accord well with the prevailing character of the conservation area.

The scheme's direct impact on the Building of Townscape Merit would be somewhat greater than the consented application 16/0606/FUL, in that more of the rear wings would be removed and a new rear façade would be built across the back of the police station building. This would cause some harm to the BTM, however it is notable that the parts of the building which provide its key special interest would be retained, namely: the street frontage with its high quality elevation, and the upper part of the east gable with its oeuil-de-boeuf window. The rear parts of the BTM are of much lower architectural value, albeit there will be some harm from the loss of the areas proposed. Regarding the internal alterations, these would not be subject to local or national heritage controls and the issue of harm under the NPPF does not apply.

National policy considerations

In terms of the heritage policies within the NPPF, the proposed works would not cause 'substantial harm' to any designated heritage assets since the key parts of the BTM would be retained and so its main contribution to the Hampton Village Conservation Area would continue. The change to the settings of the listed buildings at 46-54 Station Road would not amount to 'substantial harm'. Consequently, paragraph 195 of the NPPF would not apply.

There would be a degree of 'less than substantial harm' to the conservation area (much more than to the settings of listed buildings) from the loss of parts of the rear wings of the former Hampton Police Station building, and therefore paragraph 196 of the NPPF would apply here. This states that any such harm should be weighed against the public benefits of the proposal. In this case the public benefits include the heritage benefit to the conservation area of reinstating a lost part of the street frontage in place of the existing stark boundary wall and hard landscaping along Station Road, and also the wider public benefits of the proposed new care home. The architect's and planning consultant's submissions set out how these public benefits overall can be considered sufficient to outweigh the relatively low harm to heritage caused by the loss of parts of the rear of the BTM (see particularly section 5 of the Planning Statement by JLL).

The Building of Townscape Merit is covered by paragraph 197 of the NPPF, which notes that the scale of any harm or loss should be taken into account when considering whether to grant consent, in the context of the significance of the asset. In this case the key significant aspects of the BTM are being retained, whilst the losses are occurring to the less significant rear parts of the building. The public benefits of the care home provision contained in the scheme, with the relatively sympathetic massing proposed, accompany the loss of these lesser parts of the BTM. Hence there is potential for the harm identified under paragraph 197 to be outweighed by the public benefits of the scheme, and how they do so is explained in the architect's and planning consultant's submissions (particularly section 5 of the Planning Statement by JLL).

Local policy considerations

The policies of the London Borough of Richmond's Local Plan 2018 which apply include LP1, LP2, LP3 and LP4.

In terms of Policy LP1 the earlier parts of this chapter have noted how the development's layout, massing, materials and style would accord generally with the wider character of the conservation area. Additional information on this aspect is provided within the Design & Access Statement by PRC Architects.

Policy LP2 would be satisfied through the care taken to keep the height of the new build elements below that of the BTM, and in line with the heights of various other buildings in the conservation area.

Policy LP3 requires that proposals should preserve and enhance the significance of conservation areas, and that any harm should be outweighed by the public benefits of the proposals. The proposed scheme's general architectural approach would fit with the wider conservation area, whilst the reinstatement of the Station Road frontage would be an enhancement. There would be some harm arising from the loss of the less significant rear parts of the Building of Townscape Merit, but in this instance the architect's and planning consultant's submissions explain how the public benefits of the proposals could outweigh this harm (see particularly section 5 of the Planning Statement by JLL).

Regarding Policy LP4 the main part of the BTM would be retained and therefore it is not entirely clear whether the scheme would fall under the definition of 'demolition'. Nevertheless as noted above, and particularly in the Planning Statement, the public benefits delivered by the scheme have potential to outweigh any harm to the non-designated heritage asset.

With regard to the Draft Hampton Village Planning Guidance SPD, the proposed scheme includes an employment-generating use, which also provides community infrastructure. The more significant parts of the BTM will be retained, including those which provide visual cues to its previous use as a Police Station. Less significant parts would be removed to enable the wider public benefits of the scheme, and the massing of the new elements would respect the existing front building and surrounding area with the majority of the new build no higher than 3 storeys above ground.

NB in reviewing the scheme's compatibility with the London Borough of Richmond's policies and guidance it should also be borne in mind that these policies have weight to the degree that they are consistent with the policies of the NPPF (as considered above).

6.0 Conclusion

The National Planning Policy Framework requires local authorities to ensure that the particular significance of any heritage asset, whether designated or non-designated, is properly assessed. This assessment has described the significance of Hampton Police Station as a Building of Townscape Merit, and also analysed its role within the Hampton Village Conservation Area: the prime value of the building lies in its historic interest as a Metropolitan Police Station of 1905, as expressed first and foremost in the architectural quality of its street frontage and return gable. The interiors and rear areas of the original building are of much lower significance, while the later extensions and outbuildings contribute little to the building's heritage value.

The proposed scheme for conversion of the more significant parts of the BTM into part of the care home, combined with the removal of the rear structures and detracting car park, and the creation of new purpose-built care home structures of suitable form, would deliver public benefits that are described in the architect's and planning consultants' submissions. In concert with the assessment above, the Design & Access Statement and the Planning Statement jointly explain how these benefits would outweigh the 'less than substantial' harm to heritage and justify the granting of consent.

7.0 Sources

The sources below have been used in the preparation of this report.

Barson, Susie, *From Caught to Court: Police Stations and Magistrates Courts in London, Living Leisure and Law. Eight Building Types 1800-1914* (Geoff Brandwood ed.), 2010

Bing Maps

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English Heritage / Historic England, *Conservation Principles, Policies and Guidance*, 2008

English Heritage / Historic England, *Heritage List*

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Historic England Archives

London Borough of Richmond, Hampton Village Conservation Area Appraisal and Map

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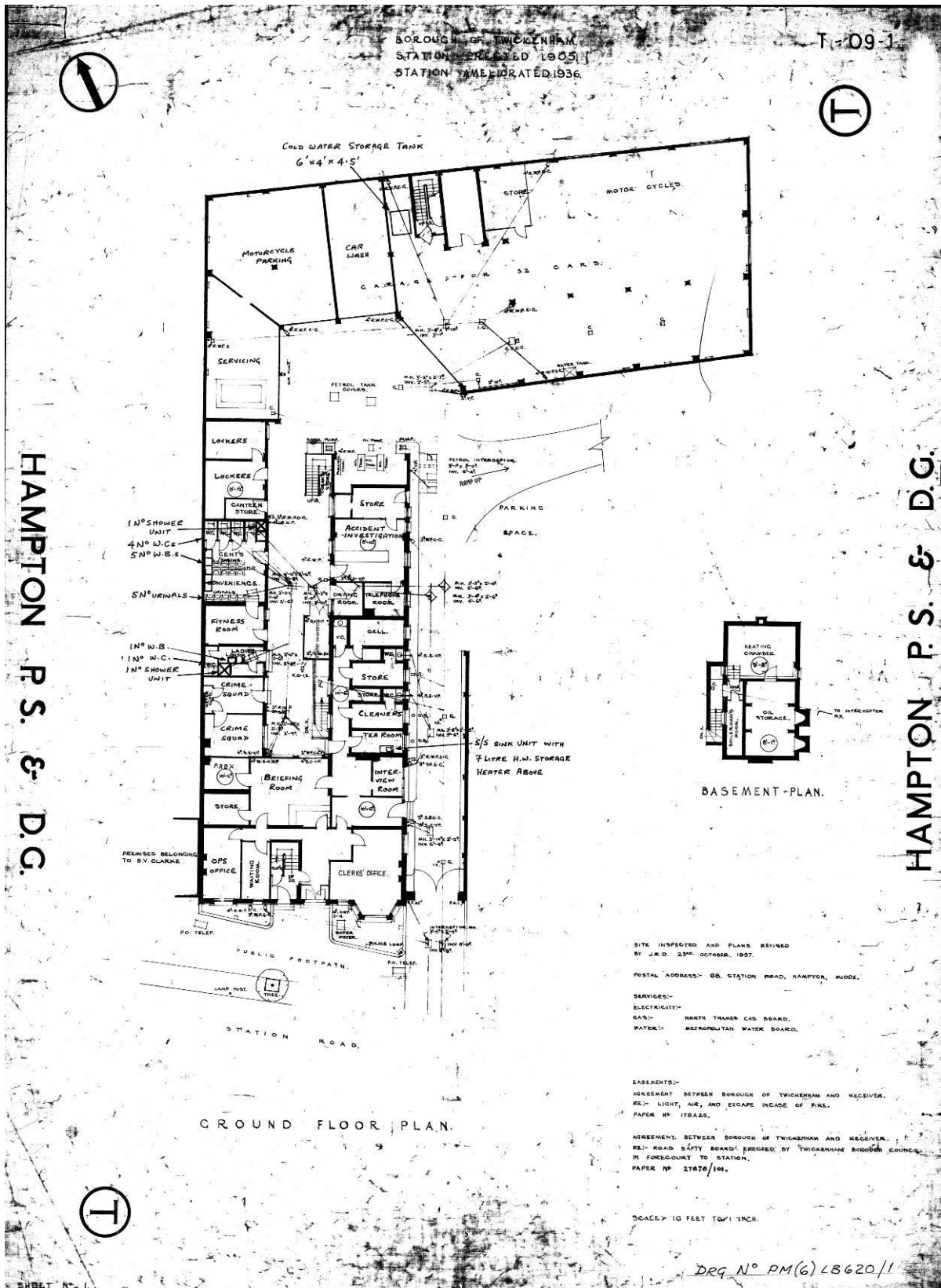
National Archives

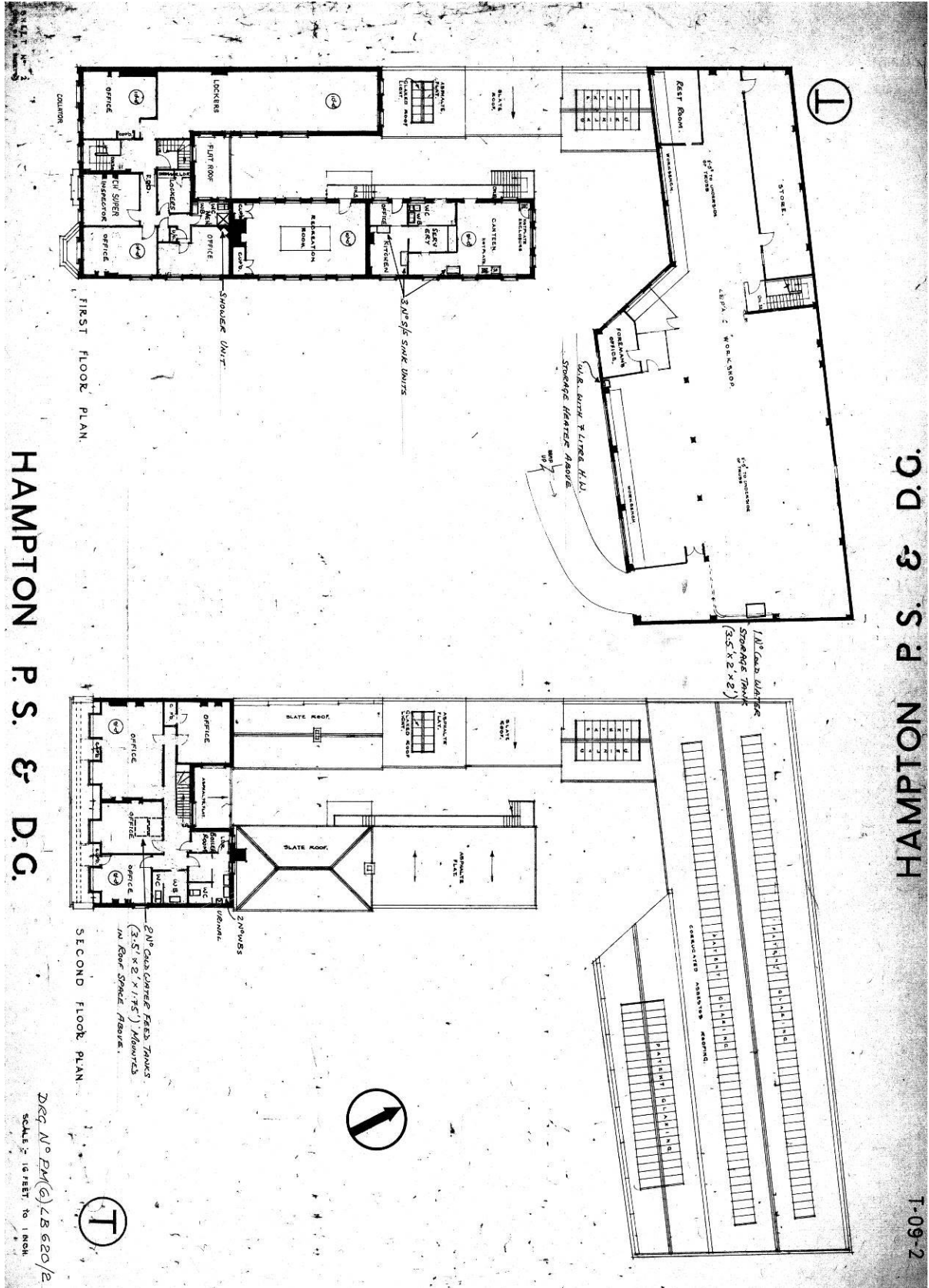
Ordnance Survey maps

Richmond Local Studies Library

RIBA biography file on John Dixon Butler

Appendix 1: 1957 plans





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