



Heritage Impact Assessment

Avenue Lodge, Ham
Common, London

September 2024 | Project Ref 8913D



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1. Introduction

- 1.1** This Heritage Impact Assessment has been prepared by HCUK Group on behalf of Susanne and John Furse. It relates to proposals for alterations and extensions to the ancillary pool range at Avenue Lodge, Ham Common, London. The London Borough of Richmond upon Thames (LBRuT hereafter) are the determining authority.



Figure 1: Avenue Lodge (grade II)

- 1.2** Avenue Lodge is a grade II listed building located on the northern edge of Ham Common and within the Ham Common Conservation Area. Within the same ownership is the separately listed Avenue Lodge Cottage (grade II) which, together with Avenue Cottage (also grade II) is one of the original 17th century gate lodges to Ham House (to the north). The avenue to Ham House, directly west of Avenue Lodge is part of the Ham Common Registered Park and Garden (grade II*) and Ham House Conservation Area covers that estate with its southern boundary just to the north of Avenue Lodge.

- 1.3** In accordance with the requirements of Paragraph 200 of the National Planning Policy Framework (NPPF, December 2023) this statement describes the significance of the identified heritage assets.

The Proposals and Relevant Background

- 1.4** In 2023, a pre-application enquiry was submitted to LBRuT (LPA ref: 23/P0304/PREAPP) concerning the replacement of the modern plant and pool room and various works of alteration and refurbishment to Avenue Lodge itself. The works to Avenue Lodge are being dealt with via a separate submission with this application for planning permission and listed building consent concerning works to the plant room and pool house.

- 1.5** These works, as outlined in full in the drawn submission by Tom Turner Architects, can be summarised as:

- Reconstruction of the existing 20th century single storey range (indoor swimming pool and changing room area) to provide a enlarged swimming pool and more functional changing rooms;
- Refurbishment of the existing plant room;
- Introduction of a new loggia to functionally link the pool house with the main dwelling; and
- Architectural enhancements to this part of the building to enhance the character of this ancillary range.

- 1.6** At pre-application stage, the proposals were assessed by the Council officers in a positive light with reference to the pool house stating:

The pool house dates from the 20th century and is of little heritage significance. The proposals would improve its appearance and present a more unified composition which would enhance the setting of Avenue Lodge. Further details of the proposed materials and finishes should be provided as part of an application.

- 1.7** Of the proposed loggia, officers noted:

Alongside the proposed works to the pool house, the loggia would visually tie the main house to this rear range, resulting in a more cohesive design approach and improving the appearance of the rear part of the building. This would not detract from the special architectural interest and may form a small enhancement, subject to a detailed design and confirmation of materials proposed to be used.

- 1.8** Overall, these works have been based on a thorough understanding of the significance of the identified heritage assets and seek to enhance the functionality of the grade II listed building as a dwelling in the 21st century while preserving, if not enhancing the significance of Avenue Lodge and surrounding assets.

Purpose of this Assessment

- 1.9** The purpose of this Heritage Impact Assessment is to assist with the determination of the application by informing the decision takers on the effects of the proposed development on the historic built environment. Value judgements on the significance of the identified heritage assets is presented and the effects of the proposals upon that significance are appraised. Particular regard is given to the provisions of the Planning (Listed Building and Conservation Areas) Act, 1990. The report also sets out how the proposal complies with the guidance and policy of the NPPF (December 2023) and local planning policy. The site and heritage assets affected have been observed and assessed following numerous site visit made by the author typically in good weather.

2. Relevant Planning Policy Framework

- 2.1** The decision maker is required by sections 16(2) and 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 to have special regard to the desirability of preserving a listed building and its setting when exercising planning functions. The decision maker must give considerable importance and weight to the desirability of preserving the significance of the listed building, 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 72(1) of the Act in respect of planning decisions relating to development within conservation areas.
- 2.3** Measures being implemented as a consequence of the Levelling Up and Regeneration Act 2024 will have the effect of making the desirability of preserving or enhancing other types of designated heritage asset a statutory consideration.
- 2.4** 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
- 2.5** 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.
- 2.6** The setting of a heritage asset can contribute to its significance. Setting is defined in the NPPF as follows:

The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting

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.

may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

2.7 Historic England has produced guidance on development affecting the setting of heritage assets in The Setting of Heritage Assets (second edition, December 2017), better known as GPA3. The guidance encourages the use of a stepped approach to the assessment of effects on setting and significance, namely (1) the identification of the relevant assets, (2) a statement explaining the significance of those assets, and the contribution made by setting, (3) an assessment of the impact of the proposed development on the setting and significance of the assets, and (4) consideration of mitigation in those cases where there will be harm to significance.

2.8 The NPPF requires the impact on the significance of a designated heritage asset⁴ to be considered in terms of either “substantial harm” or “less than substantial harm” as described within paragraphs 207 and 208 of that document. National Planning Practice Guidance (NPPG) makes it clear that substantial harm is a high test, and case law describes substantial harm in terms of an effect that would vitiate or drain away much of the significance of a heritage asset.⁵ The Scale of Harm is tabulated at **Appendix 1**.

2.9 Paragraphs 207 and 208 of the NPPF refer to two different balancing exercises in which harm to significance, if any, is to be balanced with public benefit.⁶ 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 207 and 208 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.

⁴ The seven categories of designated heritage assets are World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Park and Gardens, Registered Battlefield and Conservation Areas, designated under the relevant legislation.

⁵ Bedford Borough Council v SSCLG and Nuon UK Limited [2013] EWHC 4344 (Admin).

⁶ The balancing exercise was the subject of discussion in City and Country Bramshill v CC SLG and others [2021] EWCA, Civ 320.

- 2.10** Paragraphs 205 and 206 of the NPPF state 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.
- 2.11** One of the overarching objectives of sustainable development, as expressed in paragraph 8 of the NPPF, is mitigating and adapting to climate change, including moving to a low carbon economy. Historic England has a Climate Change Strategy, and has published Mitigation, Adaptation and Energy Measures. More specifically, Historic England has published a Heritage and Climate Change Carbon Reduction Plan (March 2022). These and similar strategies run in parallel with heritage-specific methodologies relating to the assessment of significance, and the effect of change on significance.
- 2.12** The Local Plan for the LBRuT was adopted in July 2018 and March 2020. Relevant policies of this document include:
- 2.13** **Policy LP1 Local Character and Design Quality:** Part A of this policy requires all development to be of high architectural and urban design quality and notes that the high quality character and heritage of the borough will need to be maintained. To ensure development respects, contributes and enhances the local environment, the Council note that the following will be considered: 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;
- Sustainable design and construction, including adaptability, subject to aesthetic considerations;
 - Layout, siting and access, including making best use of land;
 - Space between buildings, relationship of heights to widths and relationship to the public realm, heritage assets and natural features;
 - Inclusive design, connectivity, permeability (as such gated developments will not be permitted), natural surveillance and orientation; and

- Suitability and compatibility of uses, taking account of any potential adverse impacts of the collocation of uses through the layout, design and management of the site.

2.14 Policy LP3 Designated Heritage Assets: This policy notes that the Council require development to conserve, and where possible, make a positive contribution to the borough's historic environment and that 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 policy goes on to provide a series of criteria with the following points being relevant:

"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..."

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..."

2.15 Part C of the policy notes that all proposals in Conservation Areas are required to preserve and, where possible, enhance the character or the appearance of the Conservation Area.

2.16 The London Plan 2021 is the spatial development strategy for greater London and as such a piece of relevant planning policy. Of specific relevance is policy HC1

Heritage Conservation and Growth which notes that *“Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings.”*

3. Background and Development

- 3.1** Land upon which Avenue Lodge is constructed was historically in the ownership of the manor of Kingston/Canbury. The modern history of the site and the building itself starts in the early 1700s William Genew came to Ham and established an estate. This included a site to the north of Ham Common which contained two cottages.
- 3.2** After Genew's death in 1730 his son, also William, appears to have demolished the earlier two cottages and constructed two larger houses on the site that would become Avenue Lodge and Orford House (now St Michael's Convent, also grade II). He built these two houses with a mortgage of £400 from Anthony Brucer in 1734.
- 3.3** William appears to have not managed his finances well and in 1739 Brucer claimed the two properties by virtue of unpaid mortgages. Avenue Lodge was ultimately sold to Richard Tallemach (a solicitor and relative of the Tollmaches of Ham House) and his wife, Mary in 1788 who let the house to various tenants until selling it in 1810 to Elizabeth Mary Webb for £840 when it was described as "*a house, with outhouse and a small garden*".
- 3.4** While no records exist, it is evident from the fabric of Avenue Lodge that a series of changes were undertaken around the early 19th century including the introduction of an extension to the north of the building (now housing the kitchen) and various internal changes within the earlier core, including the introduction of a replacement early 19th century staircase in a new location (evidence of the earlier staircase remains). These changes may well have coincided with Webb's purchase of the building and represent changes she made to modernise the building.
- 3.5** Webb then married William Booth and, after her death in 1824, Booth let the building out to Sir Robert Fitzgerald. In 1843 Booth moved back to Avenue Lodge and rented a garden, stable, yard and meadow from Lord Dysart to increase the scale of the estate. The 17th century Avenue Lodge Cottage (grade II) was also in the estate at this stage but separately rented out.
- 3.6** The 1842 Tithe Map (**Figure 2**) provides an understanding of the built form on the site at this stage. It indicates Avenue Lodge as a roughly square building with an

eastern projection and Avenue Lodge Cottage in its current rectangular form. Behind Avenue Lodge is a small ancillary addition and an ancillary range of buildings while a further ancillary range of structures can be seen projecting to the north behind the cottage (listed as 'Stable and Yard' on the associated Tithe Apportionment).

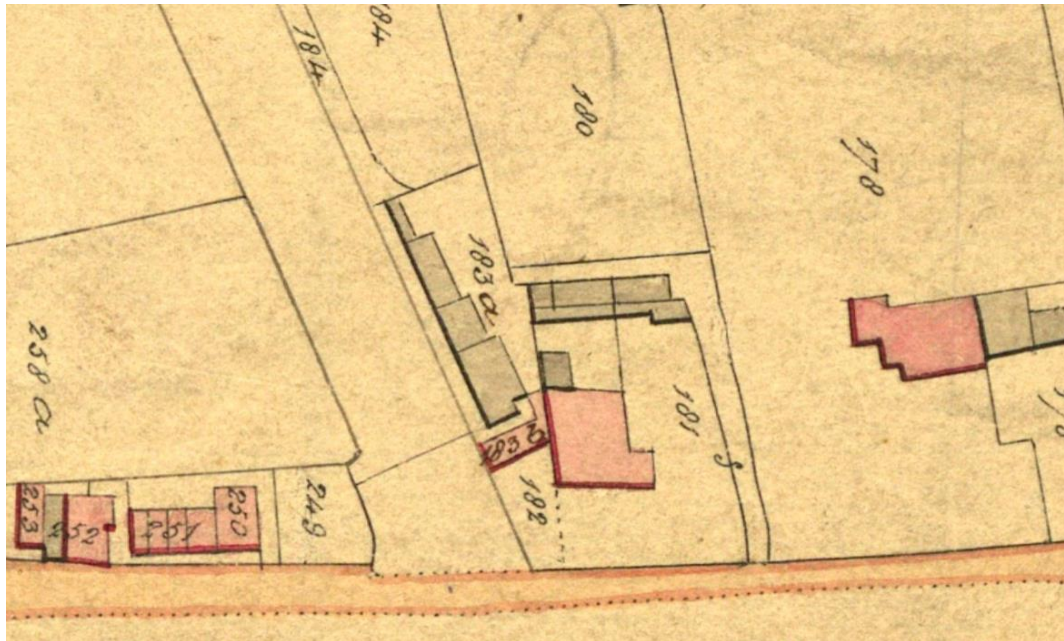


Figure 2: 1842 Ham Tithe Map © The Genealogist

3.7 The Tithe Apportionment provides useful information regarding the use and ownership of the estate at this time and can be summarised as:

Plot	Owner	Occupier	Plot Name
181	William Booth	William Booth	'House offices yard and lawn'
182	Lionel Dysart	William Booth	'Lawn'
183a	Lionel Dysart	William Booth	'Stable and Yard'
183b	Lionel Dysart	James Short	'Lodge'

3.8 The building then changed hands a number of time during the 19th century before being purchased by Lord Dysart in 1892 when it was described as:

...all that messuage, with garden, hothouse, coachhouse, stable yard and cottage, together with one acre, three roods and one perch of land adjoining

3.9

Later 19th century and early 20th century Ordnance Survey (OS hereafter) mapping show a similar arrangement as per the earlier Tithe Map.



Figure 3: 1871 OS Map (surveyed 1867-8). Reproduced with permission of the National Library of Scotland

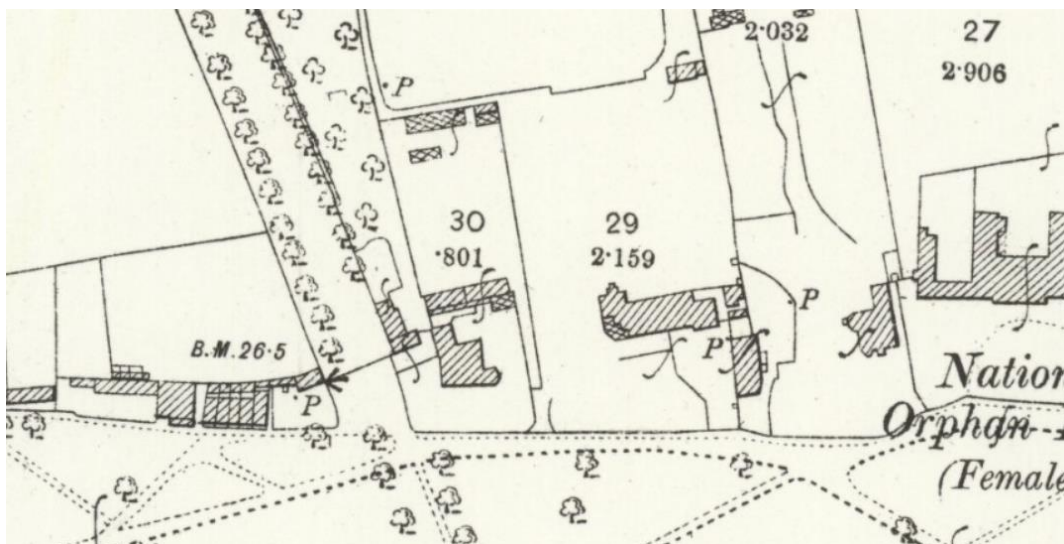


Figure 4: 1897 OS Map (surveyed 1893-4). Reproduced with permission of the National Library of Scotland

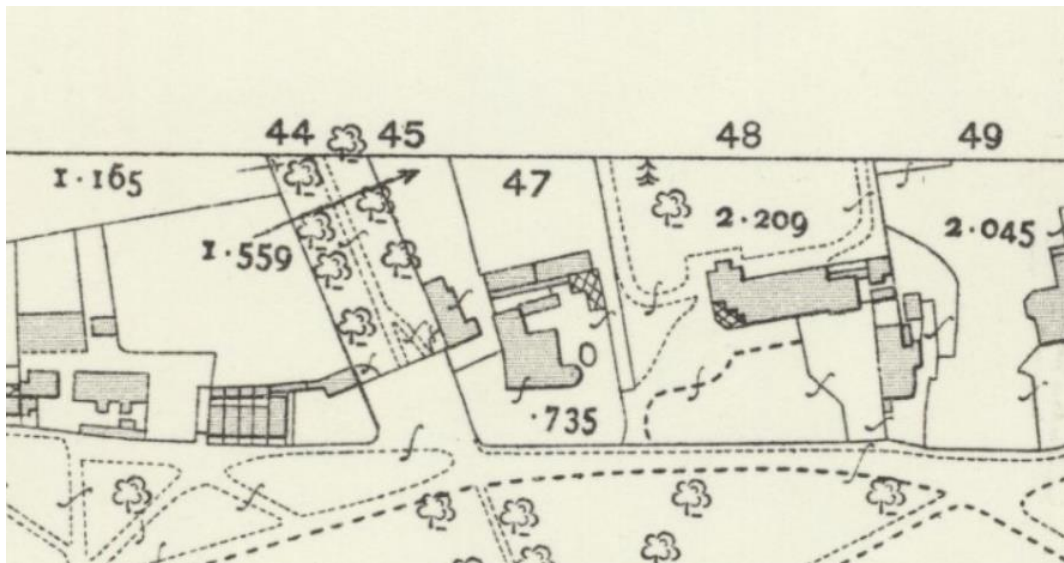


Figure 5: 1913 OS Map (surveyed 1911). Reproduced with permission of the National Library of Scotland

3.10 The building was let out to various tenants including G E Beckett Terrel in 1910 (as per the 1910 Lloyd George Domesday Survey). It was then leased by Alfred Wollersen, a banker, in 1929, who ascribed the remainder of his lease to Mr R Faber in 1933.

3.11 It was under the occupation of Faber that the first known changes to Avenue Lodge were made. Planning records have been sourced which include proposed floor plans and elevations for these changes (**Figures 6-8**).



Figure 6: Proposed elevations at Avenue Lodge, 1933

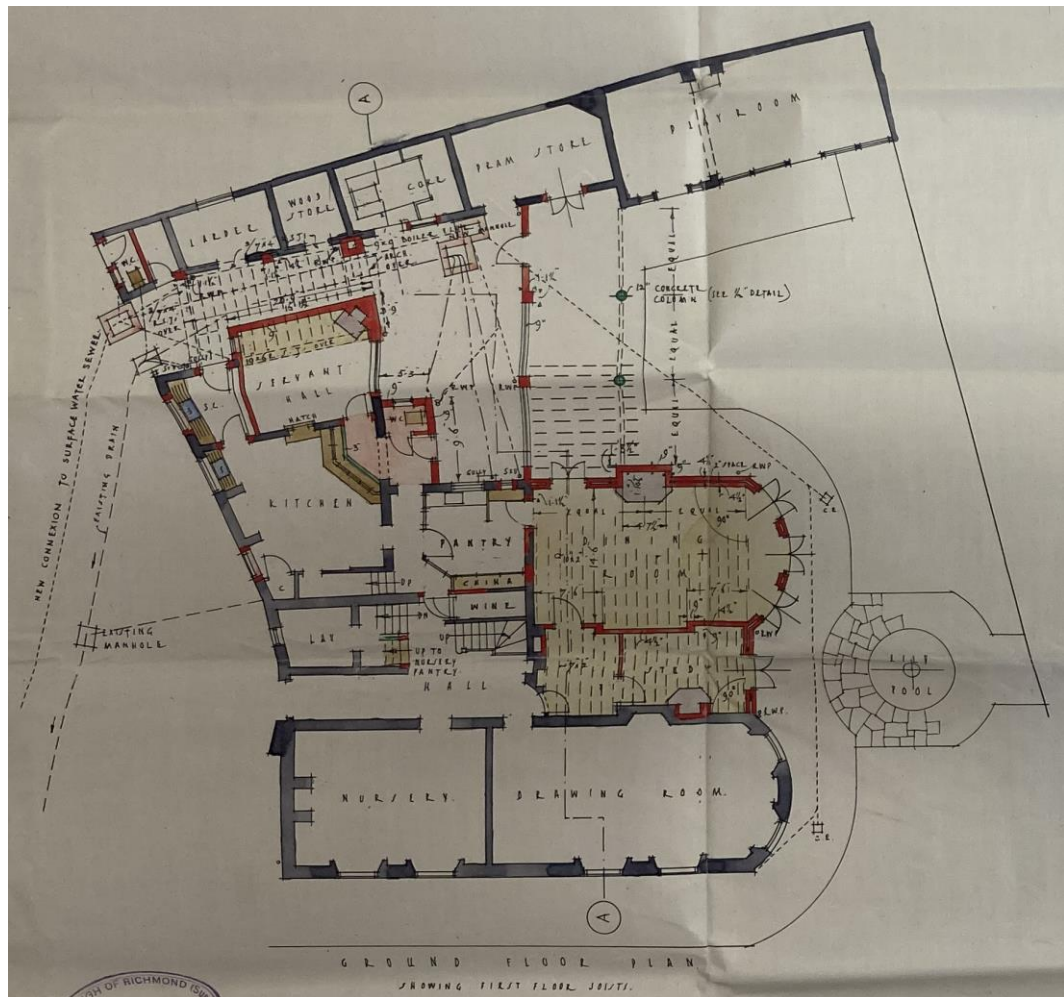


Figure 7: Proposed Ground floor of Avenue Lodge, 1933

3.12 These works were extensive and included:

- The construction of a large two storey new addition to the building’s north east corner (comprising a dining room and study at ground floor and two bedrooms to the first floor);
- The construction of a wc and servant hall extension to the north of the building;
- Addition of a new staircase from the entrance hall up to the mezzanine level (called the nursery pantry);
- The construction of a flat roofed link between the large extension and former ancillary buildings to the north; and

- Various internal alterations to plan form and layout throughout the building most notably at first floor level.



Figure 8: Proposed Mezzanine (top left) and first floor of Avenue Lodge, 1933

3.13

While it is clear that the majority of these works were undertaken, it is also evident that some of the quality of detailing was diluted as part of the construction process. For example, the detailing on the extension's chimney and northern end are clearly not of the same quality as originally proposed (**Figures 9-12**).

architect who may have been responsible for a number of further changes to the building including the reconstruction of the ancillary range to the north and its conversion into an orangery and then an indoor swimming pool (and the removal of the former link).

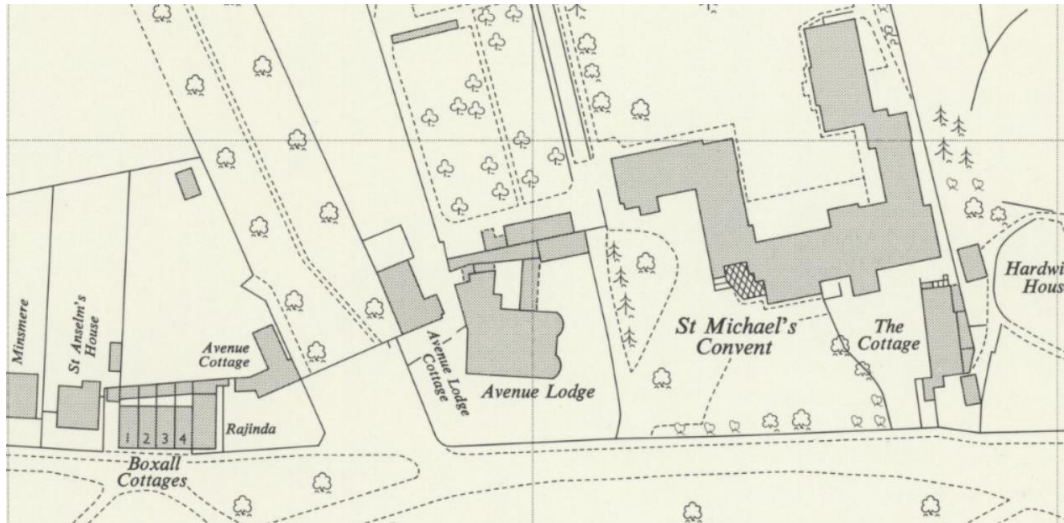


Figure 13: 1959 OS Map (surveyed 1959). Reproduced with permission of the National Library of Scotland

3.17 Avenue Lodge was designated as a grade II listed building in 1983 with its list description simply reading:

C18 or C19 house. Two storeys, 5 windows. Rendered with wide eaves and slate roof. Entrance on west side.

3.18 Due to the complexity of the building's history and development over time, a series of phasing plans have been produced which seek to provide more detail regarding the development of the building and the way in which it has changed over time (**Figures 14 and 15**).

3.19 These plans are informed by the documentary research (presented above) alongside visual assessment of the building's fabric and investigative works which have sought to understand the date of fabric further.

3.20 On both plans, an area highlighted by a blue dashed line can be seen which indicates an area of uncertain development. This part of the building may have originated in the 18th century as part of the original 1730s dwelling but equally may

have been introduced as a slightly later date in the early 19th century when a series of alterations and extensions are known to have been made to Avenue Lodge.

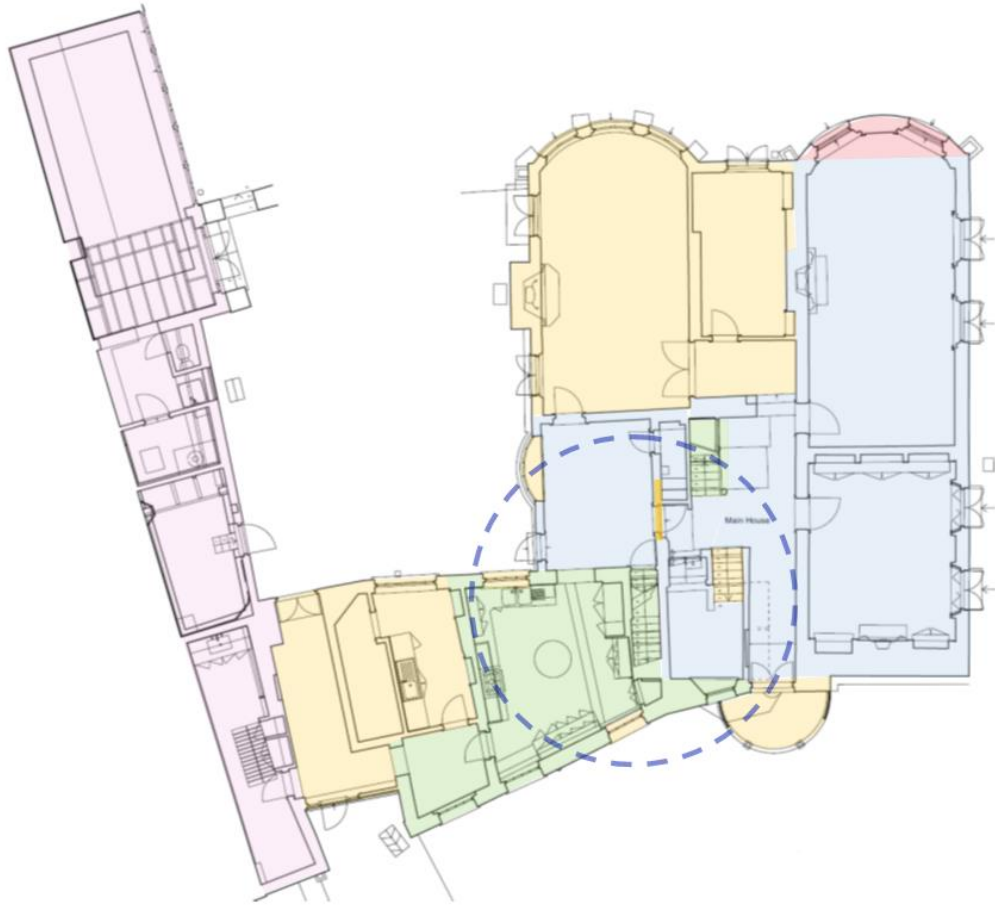







Figure 14: Ground floor phasing plan of Avenue Lodge

-  c.1734
-  C18 origins, now entirely C20
-  Early C19
-  Late C19
-  1930s and later 20th century

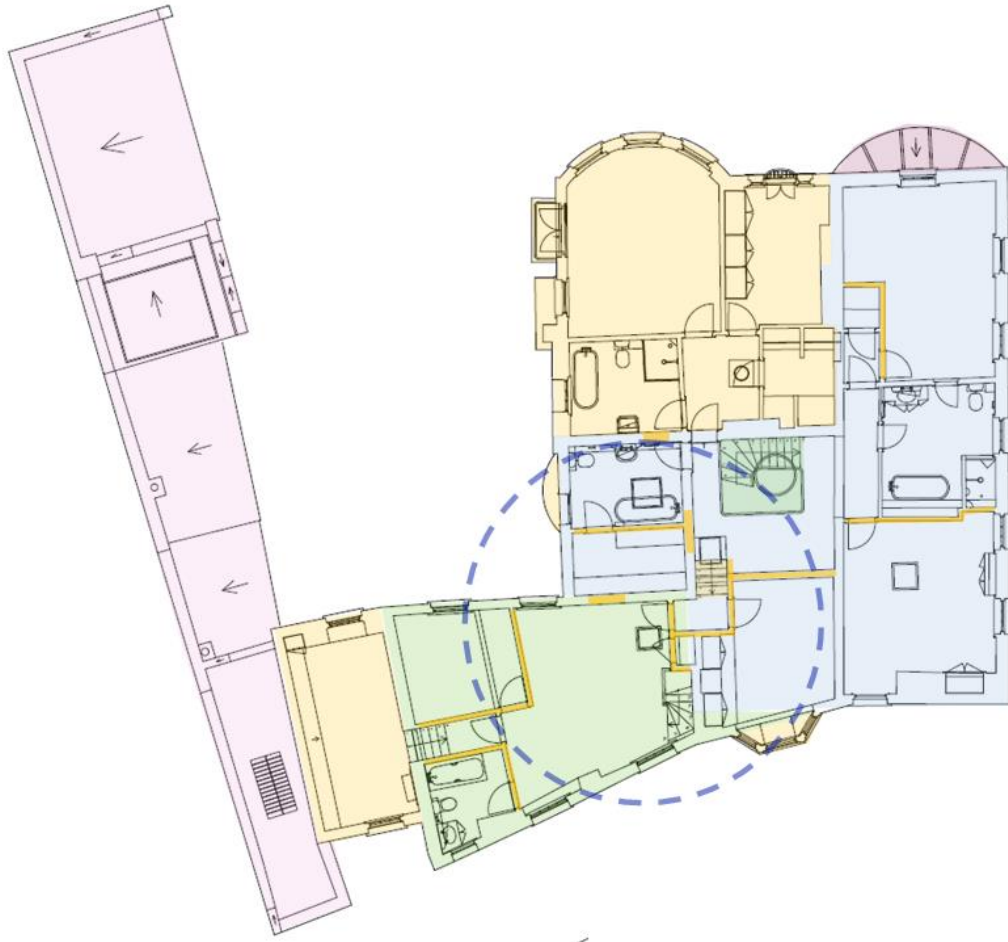


Figure 15: First floor phasing plan of Avenue Lodge

Ancillary Range at Avenue Lodge Current Description

- 3.21** As identified above, the building has been considerably altered over time with successive changes made by its owners throughout the 18th, 19th, 20th and 21st centuries.
- 4.1** To the north of the main listed building is the ancillary range which appears to have its origins in the 18th century though has been re-worked a number of times and now wholly dates to the 20th century, as per the phasing plans (**Figures 14 and 15**).
- 4.2** The section of this range of buildings closest to Avenue Lodge includes a small plant room and changing rooms for the adjacent pool. Externally, plainly detailed with a

rendered finish, small number of vents and single modern window and door (**Figure 16**) and pan tile roof which butts against a stock brick wall to the rear (**Figure 17**). Internally these areas are basic in their form and detailing (**Figures 18 and 19**).



Figures 16 and 17 Ancillary range to the north of Avenue Lodge



Figures 18 and 19: Internal view within the western end of the ancillary range comprising plant room and pool changing rooms

4.3

The eastern end of the range contains the pool house and this part of the building is constructed from a brown brick with large timber doors (**Figures 20 and 21**). Internally this area includes a narrow tiled surround around the pool and timber cladding to the walls and ceiling (**Figure 23**).



Figures 20 and 21: Ancillary range to the north of Avenue Lodge



Figures 22 and 23: Ancillary plant room within the range (left) and internal view within the pool house (right)

4. Statement of Significance

Assessment of Significance

- 4.4** This chapter of the report establishes the significance of the relevant heritage assets in the terms set out in the NPPF, and comments on the contribution of setting to significance. In accordance with paragraph 200 of the NPPF, the descriptions are proportionate to the asset's significance and are sufficient to understand the nature of any impact the proposals may have upon that significance.
- 4.5** With regards to matters of setting, the identification of the heritage assets equates 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 5 (Heritage Impact Assessment) and with the tabular methodology at **Appendix 3**.
- 4.6** It is recognised that not all parts of a heritage asset will necessarily be of equal significance. In some cases, certain aspects or elements could accommodate change without affecting the Government's objective, which includes the conservation of heritage assets and which seeks to ensure that decisions are based on the nature, extent and level of significance of heritage assets. Change is only considered to be harmful if it erodes an asset's significance. Understanding the significance of any heritage asset affected is therefore fundamental to understanding the scope for and acceptability of change.

Avenue Lodge (grade II)

- 4.7** Avenue Lodge is building of special architectural and historic interest commensurate with its identification as a grade II statutory listed building.
- 4.8** Architectural interest relates to the building's general form and appearance. This is most evident with regards to the building's southern front with its rendered symmetrical elevation (likely the former front elevation) but also in the way the

structure has been altered and adapted over time creating fortuitous aesthetic interest. The building's generally high quality materiality and craftsmanship contributes to its architectural value.



Figures 24 and 25: Avenue Lodge (grade II)

- 4.9** Externally a number of features of the building are not of the same quality and could be considered to detract from the interest of the building, namely:
- The 1930s chimney to the building's north elevation (which is clearly not as originally designed, **Figures 9 and 11**);
 - The 1930s northern end of the building which does not have the architectural flair originally intended (**Figures 10 and 12**); and
 - The weatherboarded section of the building (north elevation) which contrasts with the overall character and quality of the building.

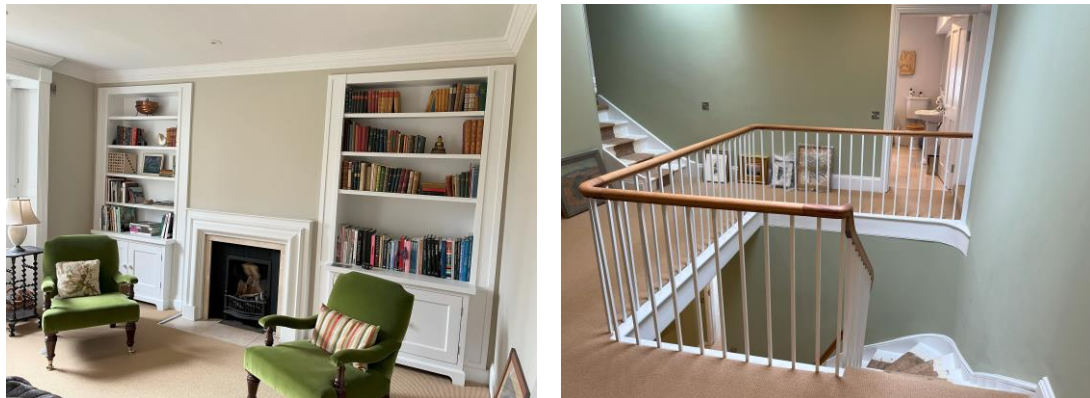
4.10 Internally aspects of the building are also of architectural interest including the early 19th century staircase and other historic elements of joinery and detailing.

4.11 The building's historic interest is both associative and illustrative. Associative interest relates to the building's links to various well known locals from the 18th and 19th century and Lord Dysart (of Ham House) who purchased the house in 1892. Illustrative historic interest relates to the way in which the building provides tangible physical evidence as to the development of this part of Ham Common in the 18th century and, more generally, the way that it illustrative architectural

fashions, and social, domestic and economic practices of the periods of its construction.



Figures 26 and 27: Main entrance (left) and rear elevation (right) showing some of the later alterations and additions to Avenue Lodge



Figures 28 and 29: Examples of historic fabric and detailing present within Avenue Lodge

4.12 Due to the way in which the building has been heavily altered since its original construction in the 1730s, it is also possible that the building has some archaeological interest insofar as the building could provide potential evidence as to past human activity worthy of investigation.

4.13 The 1930s extensions to Avenue Lodge have been sensitively designed for the most part to be in keeping with the character and materiality of the grade II listed building. While these aspects of the building reflect its most recent phase of comprehensive extension and alteration, they are not of any special interest in their

own right. Similarly, while forming part of the listed building, the re-worked ancillary range to the north (**Figures 16-23**) now wholly dates to the 20th century and is a neutral element of the building's significance and is not of any special interest. This was confirmed by the council during pre-application discussions where they noted that the pool house "dates from the 20th century and is of little heritage significance".

Ham Common Conservation Area

4.14 The Ham Common Conservation Area was first designated in 1969 with various boundary amendments in the 1970s, 1980s, 1990s and most recently in 2004. The area centres on the common itself and surrounding built form.



Figure 30: Ham Common Conservation Area boundary map

4.15 The settlement of Ham Common stems from the 17th century when it was established as being associated with Ham House to the north. The area contains a number of 18th century mansions attracted by the picturesque setting and prestigious location.

4.16 One of the key features of the conservation area's significance and historic interest relates to the central green which, in conjunction with the area's parkland surroundings (which feature in numerous views alongside views of Ham House) provide the area with a remarkably rural character.

4.17 In recognition of the area's varying character, the short conservation area note produced by LBRuT divides the area into a number of character areas which are "united by their relationship to the green and landscape setting". The pre-application site falls within the Ham Common Green Character Area. Of this part of the conservation area, the note states:

The open triangular Ham Common village green is defined by an exceptional number of well spaced fine buildings arranged informally around the perimeter. The green is edged by mature trees, includes a village pond and contrasts with the wilder woodland of Ham Common to the East. Buildings around the green are varied in scale, from groups of modest terraced cottages to 18th century mansions in their own mature grounds. Front boundaries further define the edge of this central space. Key buildings include the 18th century Ormerley Lodge (listed grade II) and Cassel Hospital (listed grade II), and a pair of 16th century brick lodges framing the Great South Avenue. Langham House Close is a remarkable group of listed brutalist blocks of flats built in the former garden of an 18th century house still facing the green.*

4.18 The significance and special interest of the conservation area relates to its high quality built form (which includes 17th century lodges to Ham House and a large number of 18th century dwelling fronting the common) and the area's historic interest as a 17th century settlement associated with Ham House. Avenue Lodge as a high quality 18th century dwelling directly fronting the common is a clearly positive element of the conservation area's character, appearance and significance, particularly its southern elevation which is likely the building's historic frontage and which has a clear visual connection with the common. The ancillary range and pool house does not contribute to or better reveal the significance of this asset and is a neutral element of the conservation area which cannot be readily appreciated from public spaces within the conservation area as a result of the built form of Avenue Lodge itself, intervening tree cover and the sheltering nature of the building's boundary wall.

Avenue Lodge Cottage and Avenue Cottage (both grade II)

4.19 Avenue Lodge Cottage (within the pre-application site) and Avenue Cottage (to the west) are both grade II listed buildings (UID: 1192609 and 1080826). They were both listed in January 1950 and, respectively, their list description read:

C17 origins with C18 or C19 work. Two storeys. Brick built with tiled roof and brick modillion cornice table to eaves. Three windows wide with central window and hooded entrance set in advanced bay with Dutch gable. Oak roof inside.

C17 origins. Gable later. Forms a pair with Avenue Lodge Cottage which stand either side of its avenue leading to Ham House. Two storeys. Brick built with tiled roof and brick modillion cornice table to eaves. Three windows wide with central window and hooded entrance set in advanced bay with Dutch gable. Oak roof inside.

4.20 The significance of these two cottages relates primarily to their architectural and historic interest as a pair of high quality 17th century lodges to Ham House. Architectural features, such as the high quality brickwork elevations and Dutch Gables contribute to their significance.



Figures 31 and 32: Avenue Lodge Cottage (left) within the pre-application site and Avenue Cottage (right) located to the west, both grade II

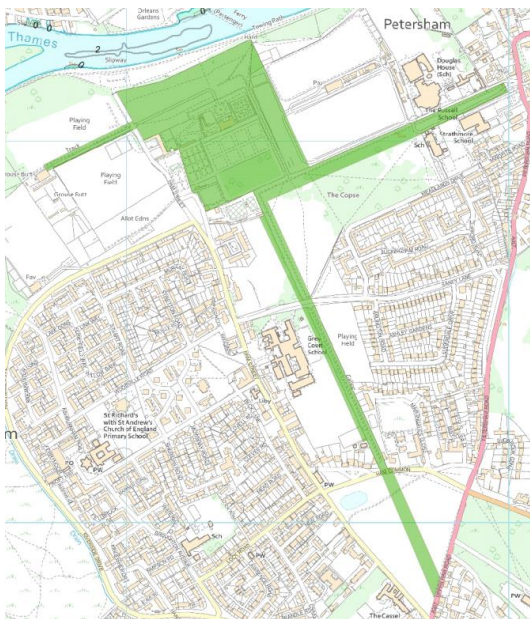
4.21 The group value of the pair of cottages together and their relationship with Ham House and its southern avenue are a key component of the significance and special interest of the lodges. Avenue Lodge is also a positive aspect of the setting of the listed buildings (particularly Avenue Lodge Cottage which is within the same ownership and curtilage of Avenue Lodge) as an in keeping element of historic

townscape. The 20th century ancillary range and pool house to the north of Avenue Lodge is a neutral element of the significance and setting of these lodges and do not contribute to or better reveal their significance.

Ham Common Conservation Area and Ham House Registered Park and Garden (grade II*)

4.22 The Ham House Conservation Area was designated in 1975 with boundary amendments made in 1982. Shortly after the Ham House Registered Park and Garden (UID: 1000282) was registered in October 1987

4.23 The RPG covers the core of the Ham House landscaped grounds and gardens and three separate spurs (east, south and west) which follow the alignment of avenues leading to Ham House, a grade I listed building (**Figure 33**). The conservation area covers a more extensive area (**Figure 34**).



Figures 33 and 34: Ham House Registered Park and Garden boundary (left) and Ham House Conservation Area Boundary (right)

- 4.24** The short conservation area note produced by LBRuT provides a good description of the character of the conservation area and a summary of the significance of the assets as follows:

The conservation area is focused on the remarkable Ham House and its estate, an exceptionally fine example of a 17th century country house and grounds in a distinctive rural setting by the River Thames. In recognition of the historical and scenic importance of Ham House, its grounds and riverside setting, this estate is listed grade II on the Register of Historic Parks and Gardens. Ham House is highly visible from Richmond Hill and from both banks of the river. It is one of the strategic landmarks of the Borough and plays an important role as part of the wider formal landscape of Ham Common, Richmond Park and Twickenham riverside. This has been accentuated by 18th century landscape architects who have planted formal avenues to visually link Ham House with the surrounding landscape and landmark buildings such as Marble Hill. Ham House's relationship with the river is an intimate one with floodwater serving as a reminder of the continued dominance of the natural landscape in Ham.*

- 4.25** Avenue Lodge Cottage, as one of a matching pair of 17th century lodges to Ham House contribute to the significance of these assets in a strong positive way. Similarly, Avenue Lodge, as a historic dwelling which contributes to the character of the southern approach to Ham House, the conservation area and registered park, is a broadly positive element of the surroundings of these assets. However, the 20th century ancillary range and pool house on the application site do not contribute to or better reveal the significance of these assets and are a neutral component of their special interest.

5. Heritage Impact Assessment

5.1 This chapter of the report assesses the impact of the proposed development on the significance of the heritage assets identified in the previous chapter, including effects on the setting of those assets. With regards to setting matters, it equates to Step 3 of GPA3, which has a close connection with Step 2. This chapter should be read in conjunction with the preceding chapter, the drawn submission of the application and the tabular GPA3 assessment in **Appendix 3**.

Impact Assessment

5.2 As identified in the Introduction, the current proposals relate to the redevelopment of the 20th century ancillary range and pool house which are physically connected to (and therefore part of) the grade II listed Avenue Lodge but which are located to the north of the listed building. Specifically, proposals entail:

- Demolition of the existing pool house and changing room area;
- Construction of a new pool house and changing room;
- Construction of a new loggia linking this building to the main dwelling; and
- Refurbishment of the existing plant room.

5.3 Ultimately, these proposals seek to enhance the appearance and functionality of this part of the grade II listed building while ensuring that the pool is modestly extended to allow sufficient space around it to safely walk (it is very narrow at present).

5.4 These changes are not dissimilar (though are more modest in nature) than a scheme consented in 2001 whereby a large conservatory addition was introduced in the small northern yard with a new hallway which provided access to the swimming pool with the existing northern ancillary range's roof changed to a flat roof. The drawings for this application are contained at **Appendix 2**. This 2001 consent indicates that comprehensive changes to the northern ancillary range without

affecting the significance of Avenue Lodge (grade II), the conservation area or nearby heritage assets are possible.

5.5

As identified in the phasing plans (**Figure 14**) while likely having its origins in the 18th century, the existing northern ancillary range wholly dates to the 20th century and now functions as ancillary space (storage and plant room) and an indoor swimming pool. As such, whole portions of this structure are proposed to be redeveloped, this would only affect 20th century fabric of no particular heritage value in its own right. This assessment was agreed at pre-application stage.

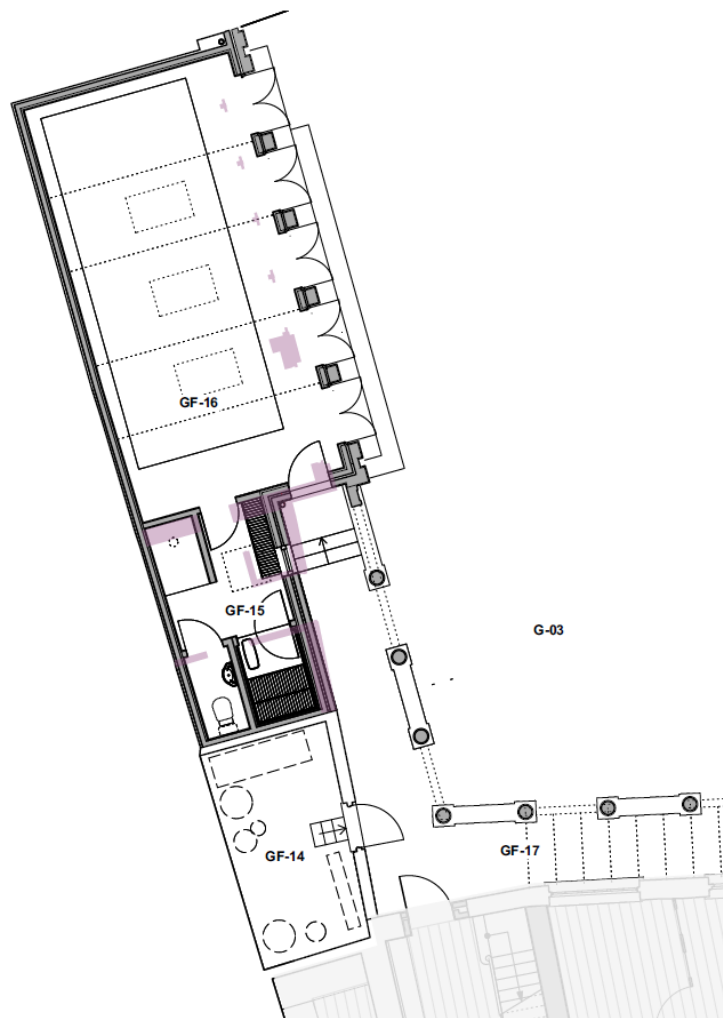


Figure 35: Proposed ground floor plan showing the re-worked northern ancillary range with demolition marked in purple (indicating 20th century fabric)

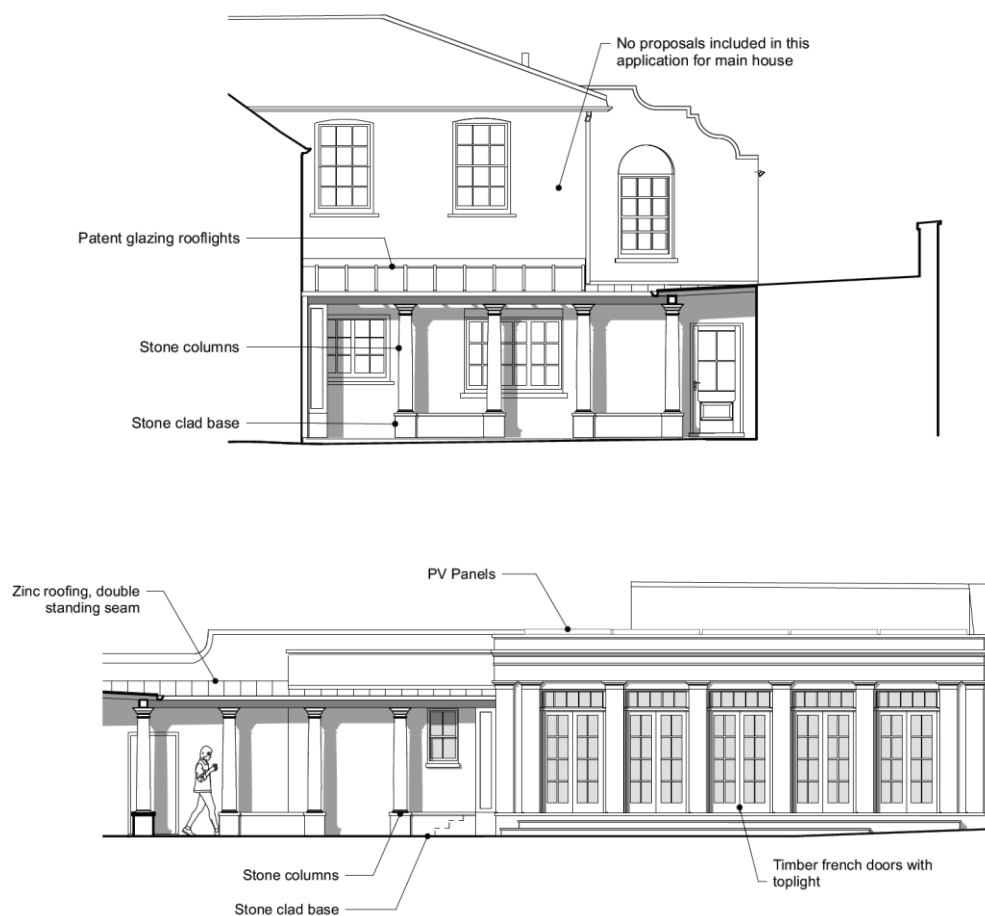
5.6

A set of proposed plans overlaid with areas for demolition are provided (**Figure 35**) and indicate that only a limited amount of modern fabric is proposed and that, for

the most part, the existing alignment of the northern ancillary range is retained with only a modern further southern projection to widen the pool area and provide a more appropriate width of walkway around the pool.

5.7

In addition, a new loggia is proposed to wrap around the rear elevation of Avenue Lodge and ancillary range providing covered access from Avenue Lodge to the pool. This feature is reminiscent of the covered walkway introduced in the 1930s but, by pushing it back to the building edge it is appreciated as a more integrated addition in a sensitive location.



Figures 52 and 53: Proposed east elevation (top) and pool house elevation (bottom)

5.8

Architecturally, the proposed loggia and new pool house elevation have been designed with the building's Classical aesthetics in mind and seek to provide a high quality sensitive element of built form on the site. Aesthetically the proposals would

sit comfortably in the context of Avenue Lodge and while slightly enlarged in terms of footprint, would remain subservient in terms of scale and prominence.

5.9 The proposals are also found to result in a clear beneficial effect with regards to the significance and setting of Avenue Lodge as follows:

- The way in which the loggia and pool house would result in the ancillary range being more unified with the design and character of Avenue Lodge, creating a more holistic composition;
- The improvement of views from the south within the grounds of Avenue Lodge; and
- Architecturally enhancing the appearance of the somewhat plain early 19th century and 1930s elevations without actually resulting in any permanent changes to these parts of the building or loss of fabric.

5.10 Overall these changes are found to entirely preserve the significance and special interest of Avenue Lodge (grade II) and the Ham Common Conservation Area as a result of the locally appropriate and high quality character of the proposed built form. While resulting in a change within the setting of Avenue Lodge Cottage and Avenue Cottage (both grade II), the ancillary northern range where proposals are focused are well screened from these assets by the built form of Avenue Lodge itself meaning that the proposals would not result in any change to their significance or setting. In terms of the Ham House Registered Park and Garden and Ham House Conservation Area, the proposals result in a wholly minor change within the setting of these assets. However, the northern wall of this range (facing the assets) would be retained without alteration, thus preserving the site's relationship with the RPG and conservation area and avoiding any effect on their significance and setting.

Summary and Policy Compliance

5.11 The proposed development is based on an understanding of the character, significance, setting and historic development of Avenue Lodge and other nearby designated heritage assets identified. The proposed development has been informed by desk based research and on-site assessment of surviving historic fabric

with the proposals being specifically designed to enhance the functionality of this part of the grade II listed building and improving the appearance of the northern ancillary range while being sensitive to, and where possible, enhancing the significance of the assets.

5.12 As identified above, the proposals are found to entirely preserve the significance of the assets identified. As such, it is the findings of this report that the proposed works would fall outside of the remit of paragraphs 207-208 of the NPPF insofar as they will not result in any harm to, or loss of significance. There would be preservation for the purposes of Sections 16, 66 and 72 of the Planning (Listed Building and Conservation Areas) Act 1990.

5.13 The proposals are also found to accord with relevant local planning policy (as identified in Section 2) as follows:

- **Policy LP1 Local Character and Design Quality:** In accordance with the requirements of this policy, the proposed development will be of a high quality and will contribute to the heritage and local character of the area having regard to height, massing, form, materials and detailing.
- **Policy LP3 Designated Heritage Assets:** The proposed development is found to accord with the requirements of this policy insofar as the proposals make a positive contribution to the borough's historic environment and give great weight to the conservation of the identified heritage assets. Historic and significant elements of Avenue Lodge are retained and fabric proposed to be removed is confirmed as being 20th century in date and of little to no heritage value. While enhancing the functionality of the dwelling, the proposals also notably improve the architectural character of this part of the building and make use of appropriate materials and techniques.
- **London Plan 2021 Policy HC1:** In accordance with the requirements of this policy the proposals would conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.

6. Conclusions

6.1 This Heritage Impact Assessment presents an assessment of significance of Avenue Lodge (grade II), the Ham Common Conservation Area and various other nearby designated heritage assets. This is followed by an appraisal of the effects of the proposals upon these heritage assets with consideration given to local and national policy and guidance.

6.2 Avenue Lodge is a grade II listed building located on the northern edge of Ham Common and within the Ham Common Conservation Area. Within the same ownership is the separately listed Avenue Lodge Cottage (grade II) which, together with Avenue Cottage (also grade II) is one of the original 17th century gate lodges to Ham House (to the north). The avenue to Ham House, directly west of Avenue Lodge is part of the Ham Common Registered Park and Garden (grade II*) and Ham House Conservation Area covers that estate with its southern boundary just to the north of Avenue Lodge.

6.3 Following on from positive pre-application discussions, the proposals relate to alterations to the 20th century northern ancillary range and pool house at Avenue Lodge. These works, as outlined in full in the drawn submission by Tom Turner Architects, can be summarised as:

- Reconstruction of the existing 20th century single storey range (indoor swimming pool and changing room area) to provide a enlarged swimming pool and more functional changing rooms;
- Refurbishment of the existing plant room;
- Introduction of a new loggia to functionally link the pool house with the main dwelling; and
- Architectural enhancements to this part of the building to enhance the character of this ancillary range.

6.4 These proposals are based on an understanding of the character, historic development, significance and, where relevant, setting of the identified heritage assets and have sought to sensitively upgrade and extend the grade II listed

Avenue Lodge in a manner consistent with that asset's significance and special interest.

6.5 Section 5 of this report presents an assessment of the impact of the proposals and concludes that the proposals have been sensitively designed to respect the character and significance of Avenue Lodge. The proposals would only result in the removal of a small portion of 20th century fabric and would materially enhance the appearance of the northern ancillary range and pool house. As outlined in paragraph 5.9, this would have a beneficial enhancing effect with regards to the significance of the listed building. As such, the proposals are found to preserve and enhance the significance of the grade II listed building and entirely preserve the significance of the conservation area and other heritage assets identified.

6.6 In summary, it is the findings of this report that the pre-application proposals would fall outside of the remit of paragraphs 207-208 of the NPPF insofar as they will not result in any harm to, or loss of significance. There would be preservation for the purposes of Sections 16, 66 and 72 of the Planning (Listed Building and Conservation Areas) Act 1990 and the proposals are found to be in accordance with relevant local planning policy and guidance identified in Section 2.

Appendix 1

Scale of Harm (HCUK, 2019)

The table below has been developed by HCUK Group (2019) based on current national policy and guidance. It is intended as simple and effect way to better define harm and the implications of that finding on heritage significance. It reflects the need to be clear about the categories of harm, and the extent of harm within those categories, to designated heritage assets (NPPF, paragraphs 207 and 208, and guidance on NPPG).⁷

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

⁷ See NPPG 2019: “Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.” Paragraph 018 Reference ID: 18a-018-20190723.

Appendix 2

2001 Application at Avenue Lodge

Appendix 3

GPA3 Assessment: Historic England’s guidance on setting

In assessing the effect of the proposed development on the setting and significance of designated heritage assets, 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.

Relevant Considerations	Avenue Lodge Cottage and Avenue Cottage (both grade II)	Ham House RPG and Ham House Conservation Area
<i>Proximity of the development to the asset</i>	The proposed development area is located relatively close to these two listed buildings but separated from them by the built form of Avenue Lodge itself	The ancillary northern range is located relatively close to these heritage assets but visually separated from them as a result of the northern boundary wall of the range
<i>Proximity in relation to topography and watercourses</i>	The topography of the area is relatively flat and there are no watercourses of relevance in this case	
<i>Position of development in relation to key views</i>	Key views of Avenue Lodge Cottage and Avenue Cottage would not see any change as a result of the proposed development	Key views into, out of and within the Ham House RPG and Ham House Conservation Area would not see any change as a result of the proposed development
<i>Degree to which development will physically or visually isolate asset</i>	The proposed development would not, in any way, physically or visually isolate these listed buildings	The proposed development would not, in any way, physically or visually isolate these heritage assets
<i>Prominence, dominance and conspicuousness</i>	The modest scale of the proposed ancillary range and pool house and intervening built form (Avenue Lodge) would ensure that the proposed development was not prominent or dominant within	The modest scale of the proposed ancillary range and pool house and retention of the existing northern wall of these buildings would ensure that the proposed development was not prominent

	the setting of these listed buildings	or dominant within the setting of these heritage assets
<i>Competition with or distraction from the asset</i>	For reasons identified elsewhere in this table, the proposed development would not compete with or cause any distraction from these assets	For reasons identified elsewhere in this table, the proposed development would not compete with or cause any distraction from these assets
<i>Dimensions, scale, massing, proportions and materials and design</i>	The proposed development has been carefully designed in terms of scale, form, appearance and materials to respect the character of the local area and host building, the grade II listed Avenue Lodge	
<i>Introduction of movement or activity</i>	The proposed development would not lead to any change to existing levels of movement and activity within the setting of these assets	The proposed development would not lead to any change to existing levels of movement and activity within the setting of these assets
<i>Diurnal or seasonal change</i>	Matters of diurnal and seasonal change are factored into the wider assessment	
<i>Change to built surroundings and spaces</i>	The proposals would amount to a wholly minor change within the built surroundings of these assets which would not affect their significance	The proposals would amount to a wholly minor change within the built surroundings of these assets which would not affect their significance
<i>Change to skyline, silhouette</i>	The proposed development would not lead to any effect on the skyline or silhouette of these grade II listed buildings	The proposed development would not lead to any effect on the skyline or silhouette of these heritage assets
<i>Change to general character</i>	The proposals would not result in any change to the general character of these assets or their surroundings	The proposals would not result in any change to the general character of these assets or their surroundings

Standard Sources

<https://maps.nls.uk>

<https://historicengland.org.uk/listing/the-list>

www.heritagegateway.org.uk

<http://magic.defra.gov.uk>

www.history.ac.uk/victoria-county-history

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

Planning (Listed Buildings and Conservation Areas) Act, 1990

National Planning Policy Framework, 2023

National Planning Practice Guidance, 2019

Conservation Principles, Policies and Guidance, Historic England (2008)