

**OBJECTION RESPONSE ON 2018/3810**  
**HAMPTON COURT STATION & JOILLY BOATMAN SITE REDEVELOPMENT**  
**HAMPTON COURT RESCUE CAMPAIGN RESPONSE**  
**ON URBAN DESIGN & HERITAGE ISSUES**

**Introduction**

1. This objection response document has been prepared on behalf of Hampton Court Rescue Campaign to address specific issues on Urban Design and Heritage only, and should be read alongside other objection submissions on our overall concerns, our parking study response, and other issues.
2. This document is generated from a presentation given to invited Members on 14<sup>th</sup> March 2019. It may not flow smoothly as it was originally prepared to accompany a power-point presentation, but visuals have been inserted to relate to the presentation script.
3. I am Karen Liddell, BA(Hons) MRTPI (rtd) & IHBC (rtd)
  - the name my professional qualifications are in as a full member of Royal Town Planning Institute & Institute of Historic Building Conservation
  - I am also Mrs Karen Jones
  - I have been a local resident for 32 years
  - HCRC volunteer campaigner for 12 years
  - It is my 2<sup>nd</sup> year on East Molesey CAAC
4. I have 30 years professional experience, as a conservation & design officer in 3 planning authorities, where I dealt with many complex development sites containing historic buildings and areas.
5. I'm covering the **URBAN DESIGN & HERITAGE** issues only under the topics
  1. Site Character
  2. Historic context & the station
  3. Complex site context
  4. The Residential Villas & Heights
  5. The Hotel Building
  6. The Riverside Building, station & open space
6. I will be referring in each topic to the negative impact of the scheme on the setting of the historic station and listed bridge, and the detriment to the character and appearance of the East Molesey Kent Town CA, but cannot cover the impact on the Palace in any detail.

## 1. SITE CHARACTER



1.1 This is an aerial photo with the site outlined taken from the application documents

1.2 We know this site is:-

- Operational railway land with a surface car park, together with a vacant site on ex railway land that once contained a small single storey café, plus a small car sales site;
- It is on the edge of a unique village around Bridge Road and Creek Road which has a strong sense of place;
- It is surrounded by open land to the east which separates Molesey from Thames Ditton and forms two riverside open spaces;
- It sits at the edge of the River Thames, and adjacent to the Lutyens listed Bridge, and forms the foreground to the historic Hampton Court Palace which is of international importance;
- It is a complex site and I'm familiar with the planning history of the site, the 1999 Planning Brief and the 2008 approved scheme;

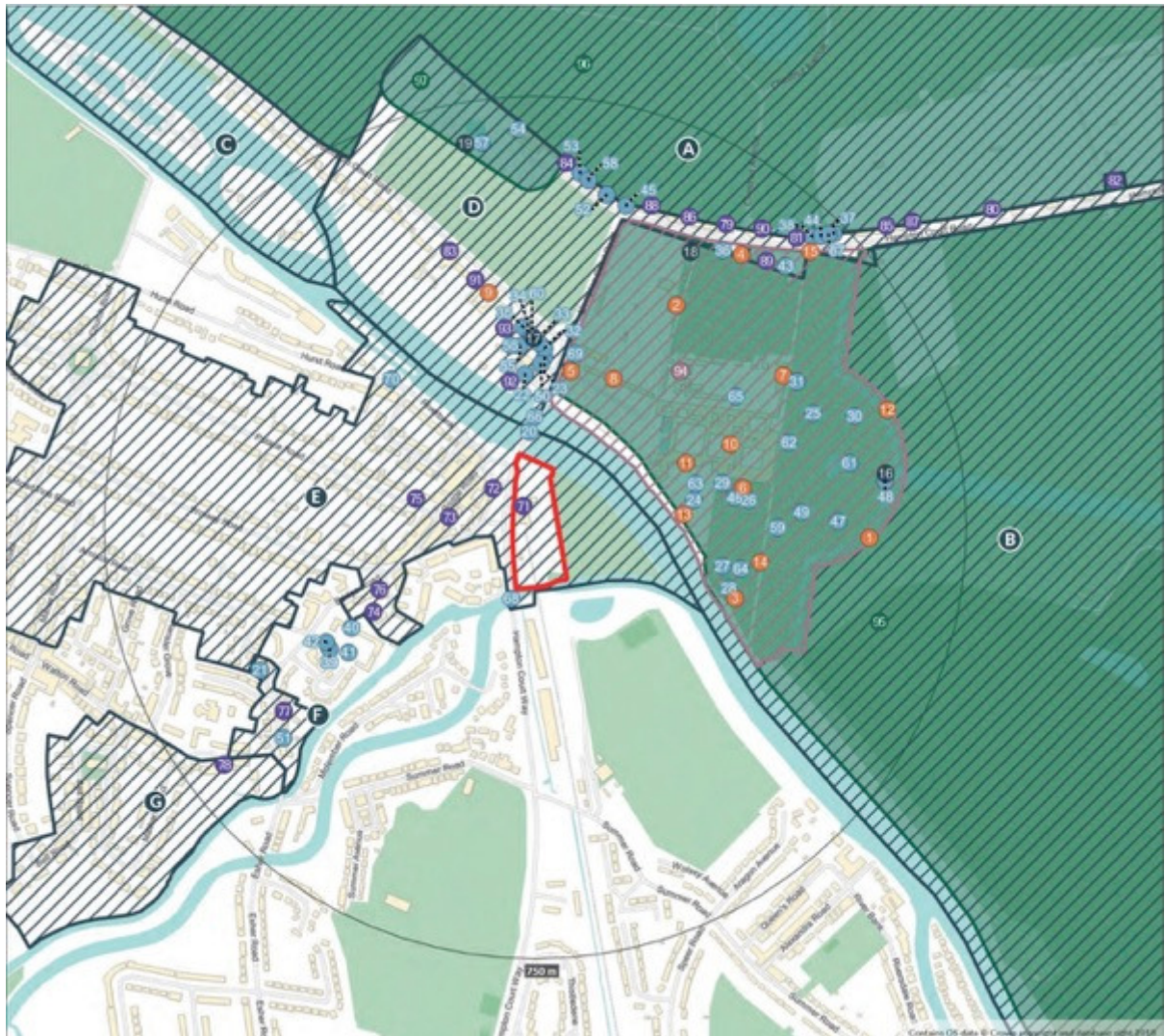
1.3 We know this site is NOT

- A brownfield site; the majority of the site is still in use. The Jolly Boatman part of the site originally contained a demolished single storey building on approximately one tenth of the area;
- It's not in a town centre, nor a district centre, and it's outside the Bridge Road Local Centre;

- It is not a transport hub, it is at the end of a branch line with 2 trains per hour going in one direction, and has 1 bus route that could terminate on the Richmond side of the bridge, and will need to during any construction works
- 1.4 I decided to look at all 34 plans, but of the 50 supporting documents, I knew that only two documents are relevant to the consideration of the urban design and heritage issues.
- First, the Design & Access Statement mainly by the architects Allies & Morrison, which I'll call the Design Statement, and
  - 2<sup>nd</sup>, the Heritage, Townscape and Visual Impact Study produced by Montagu Evans a specialist consultant, which I'll call the Heritage Study.
  - These 2 documents are 144 and 106 pages plus appendices, and contain some helpful analysis and images, but I would like to present to you our concerns about these assessments and how they fail to justify this unacceptable scheme.

## 2. HISTORIC CONTEXT & THE STATION

This is the HERITAGE ASSET PLAN from the Heritage Study



2.1 In an existing settlement like this, it is most important that we understand the historic context before the urban design analysis and design process starts. With so many national and local designations in the area to the north and south of the Lutyen's bridge, it is historically a very special area. The Heritage Study recognises this but does not give sufficient regard to our station.



2.2 This is our station today, dating from 1849, built as the first tourist destination in England and probably the world, it is designated in the Local Plan as a locally listed building, and identified in adopted policy as a building making a positive contribution to the character and appearance of the East Molesey (Kent Town) Conservation Area.



## Station 1912



## Station 1964

- 2.3 Looking at these historic photos we can see the station today is basically the same structure, although it has suffered some alterations and loss of architectural features since the 1970's. The application does not present any restoration proposals for the station, nor does it demonstrate the reuse of the ground, first or 2<sup>nd</sup> floor internal spaces. This is simply unacceptable, as such a major development should at a minimum demonstrate it is enabling restoration of the retained historic building. A restoration scheme was part of the 2008 approval.
- 2.4 I was disturbed to read that the Heritage Study concludes that there is harm to the setting of the station, resulting from the proximity and scale of the nearby new buildings. I will come back to the full aspect of this harm.
- 2.5 My response was that I have applied to Historic England to include the station on the national register of listed buildings
- 2.6 The last rejection, over 13 years ago, did not consider its historic importance as the first tourist line in England, nor the importance of William Tite, the architect, and his world renown team, nor the historical relationship to the Palace.

2.7 Plus, the 2006 rejection, gave no recognition to the group value of the station. My 10 page justification statement on the case for listing has been submitted separately as an objection.

2.8 In summary, as an extract from a 10 page statement, there are 3 grounds based on the stations **historic interest**:-

1. GB has the oldest railway system in the world, dating from the 1830's and arriving in London in 1836. It is asserted that the Hampton Court branch line terminating at Hampton Court Station in 1849 is part of the critical early history of the UK rail system and had a special and unique function to serve an early tourist heritage destination to Hampton Court Palace that deserves greater recognition.
2. The station was built by William Tite, architect, together with Thomas Basseby, builder, and Joseph Locke railway engineer, who together are recognised as the most influential railway heritage team in history and up there with Isambard Kingdom Brunel. This station is possibly the only example of their gothic-style remaining in southern England and it should join the other 17 listed building by Tite.
3. There is a strong historical relationship with the Palace which may not have had such success as a tourist destination if the station had not arrived, plus its building and conservation programmes of the 19<sup>th</sup> & 20<sup>th</sup> century were influenced by the railway and station's existence.

2.9 There are 4 grounds based on the **group value of its architectural interest**

4. It has a strong relationship to the Palace, containing grade 1 listed buildings, ancient monuments, and a Registered Park & Garden, as an outlying building in an important large historic estate complex; it is related to the Palace in its style and materials; there is a strong location and visual connection with the Palace.
  5. The station has a strong functional and visual relationship with the two grade 2 listed bridges across the Thames & river Ember, both by Edwin Lutyens;
  6. It has a strong visual and functional relationship with a group of buildings listed for group value and within the Hampton Court Green Conservation area north of the bridge;
  7. It forms the edge of the East Molesey (Kent Town) Conservation Area and has a strong visual, functional and historic relationship with the historic village around Bridge Road and Creek Road.
- 2.10 If the station is listed, and I do not know how long the decision will take, there would be a statutory duty on the Council to preserve the setting of the station

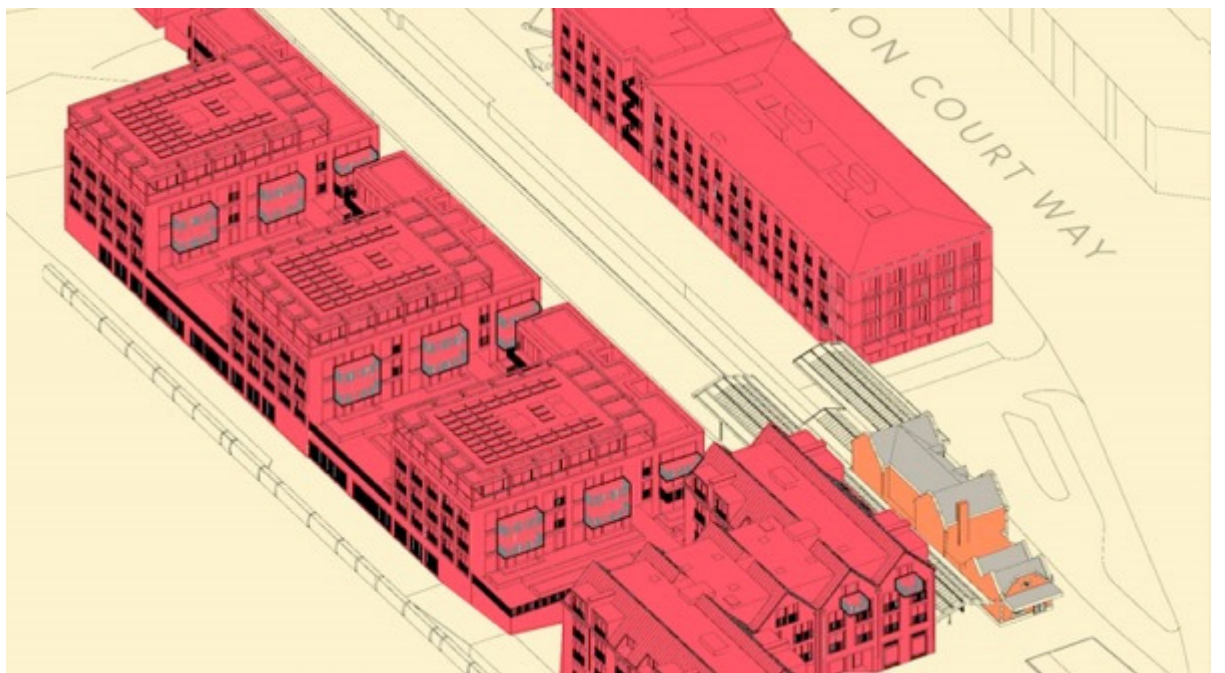
2.11 **Our Request is**

- A. That officers should make representations to Historic England for a swift decision on the listing application and that**
- B. The Council should delay consideration of a decision on this application until a listing decision is received.**

### 3. UNDERSTANDING A COMPLEX SITE CONTEXT

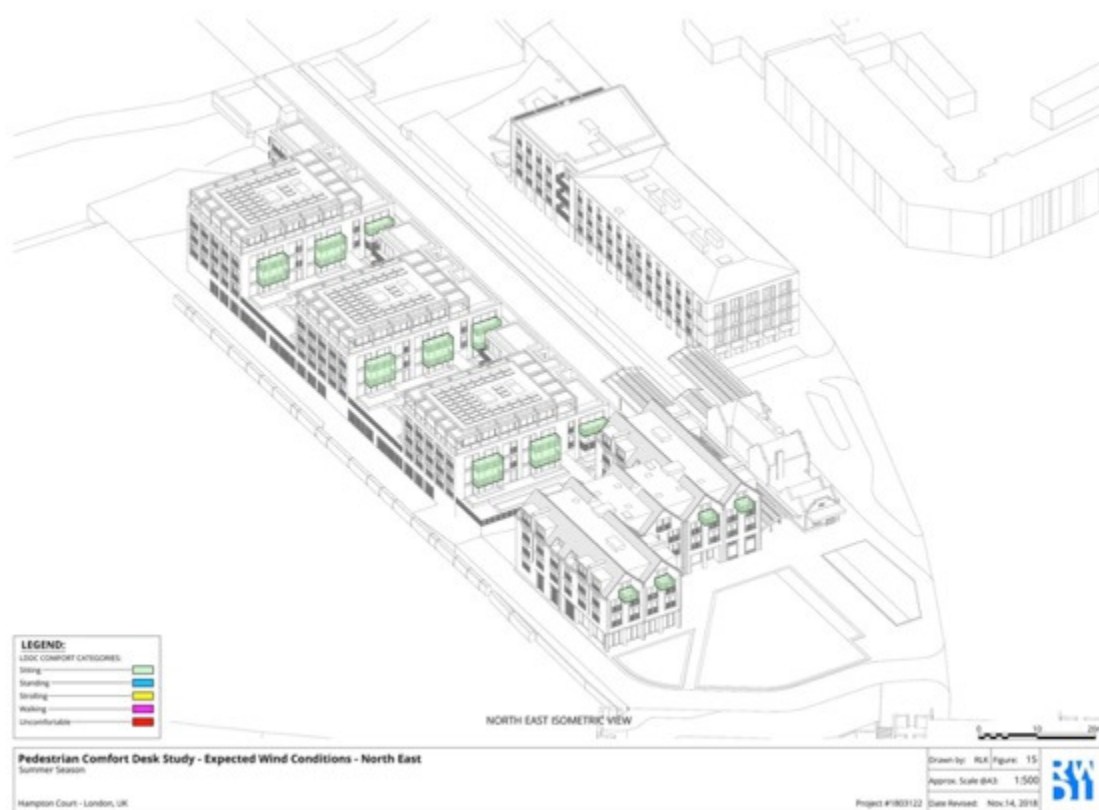
- 3.1 As the Heritage Study is not convincing, I move on to the Design Statement, to find these two studies are repetitive and not joined up. I tried to follow how the urban design concepts have been developed and if the designers understand the characteristics of the building forms and spaces in the locality. This is not a green field site. Do they demonstrate how their proposed buildings relate to the surroundings in terms of the footprints, the plan forms, the density, the massing, the heights, the building lines, the frontage widths and many more urban design concepts.
- 3.2 Urban design concepts are not subjective, they are developed from an understanding of a place. I find much information on the architectural treatment and materials, which should be the final stage of a design concept
- 3.3 So, I go back to the drawings, and I find some good elevations and sections in the context of their surroundings, but which start to worry me. I'd say drawings 201 to 205 are the most enlightening that you should all study. These drawings show how the excessive scale of the proposed blocks dwarf the Bridge Road and Creek Road tight knit built forms
- 3.4 I find the computer-generated images and the few architectural perspectives in the Design Statement, all have narrow angles and give a limited and unrepresentative impression of the scale of the complete development
- 3.5 So, I asked another HCRC member if he could give us a birds-eye aerial impression of the proposed buildings to help us understand and convey the scale of this development to the public.
- 3.6 Three videos have been produced by a HCRC member using the applicant's 3D drawings from other documents that I hadn't looked at. The videos were then made into one compilation shown in my presentation. I can only produce three stills from the videos here to demonstrate what is not found in the Design Statement. The videos are found on our website and have been distributed to Members.



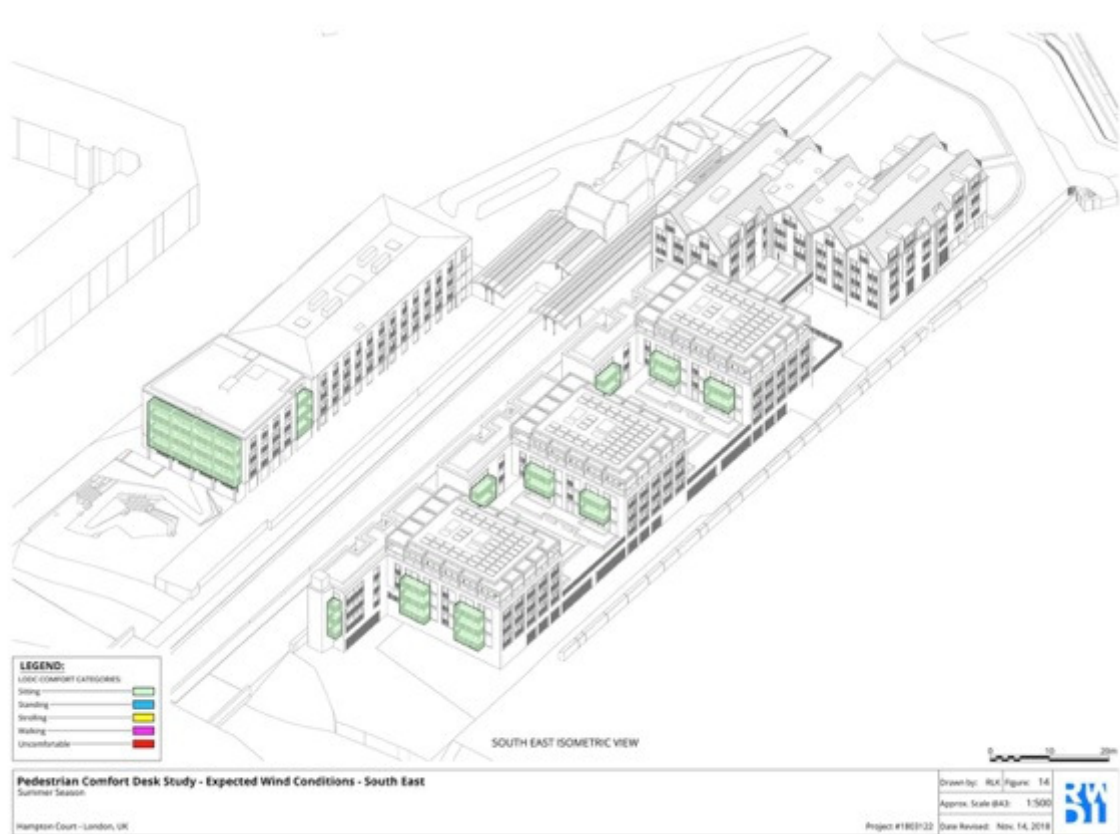




3.7 These 3D computed models produced by HCRC are produced using the following images from the applicant’s documents as specified beneath each one.



THE NORTH EAST 3D PERSPECTIVE FROM THE WIND SURVEY



THE SOUTH EAST 3D PERSPECTIVE FROM THE WIND SURVEY



A 3D PERSPECTIVE FROM THE WIND SURVEY

3.8 This one starts to show the context with the surrounding buildings, look just how big the blocks are compared to even the largest Hampton Court Parade building. The floor plan is nearly twice the depth.



A 3D PERSPECTIVE from another document based on a block plan.

3.9 This one starts to show the excessive size of the blocks north of the railway line, comprising the 3 villas and the riverside building in comparison with the many smaller block bounded by Creek Road and Bridge Road which is roughly a similar size.



A COMPUTER GENERATED MODEL in the Daylighting and Sunlight Study.

3.10 This one shows the three building blocks simply within the context of the surrounding village. The 3 villas and the riverside block fill a space greater in size than the whole of the Creek Road and Bridge Road block which comprises about 30 buildings or more.

3.11 Why are there no 3D aerial images in the Design Statement – I firmly claim we all need these to understand this proposal in its surrounding context.

3.12 The other built environment industry tool, used to understand the impact of a major development, is a scaled architectural model. I would say a model allows the viewer to move around it and see more angles than a 3D computer model. The applicants have been asked and refuse to submit a model. The EM CAAC has written to the officers and the Chair of the Planning Committee on this point.

3.13 Government Guidance sets out that a Design Statement is required for major developments and it **must** address a sites context. The advice is that “a model of a proposed development in the context of its surroundings” may accompany the Design Statement. We would argue that the Council has the remit to require a model. It does not need to be set out in the Local Validation List. A Design & Access Statement is a National Validation List requirement, and such a statement must address site context. We argue that the current submission does not address

site context, and that the submission of a scaled model of the site and surroundings would help satisfy the requirements of the national Guidance.

**3.14 Our Request is that Officers advise the applicant that the Special Planning Committee will need an architectural model of the proposal in its surroundings, together with computer generated 3D modelling images before this application is presented to Committee.**

#### 4. URBAN DESIGN & HERITAGE – THE RESIDENTIAL VILLAS & HEIGHTS

4.1 Next I'm looking at the residential villas and I'm getting frustrated that the developers are insisting these buildings are 4 stories high.

4.2 Below is the submitted section perspective, showing the changes in levels between the station platforms and the park. The building is 4.5 stories on the platform side and 5 stories looking onto the park.



4.3 A HCRC member made a funny video to show it is 5 stories. I can only reproduce a still image from the video to prove it is a 5 storey building.





Part North Elevation (from drawing no. 451\_01\_07\_204)

4.4 Drawing 11 contains this section of the highest part of the scheme with helpful dimensions annotated. The elevation facing the park is **56.06** feet high, that is 56 feet high from the new access road level. The access road is set at a lower level to the existing level, and ends up as just over 1 foot lower than the adjacent park at this point (it is higher nearer the river to the north). This elevation is therefore **54.8** feet above the existing immediate hinterland.

4.5 I am referring to the heights in feet as we know that the 1913 South Western Railways Act, and act of parliament, established that no buildings can be built within 1.5 miles of Hampton Court Palace on land in existing use or previously used for railway purposes.

4.6 This proposal breaches the 1913 Act by up to 6 feet. The applicants know this and the officers know this. It does **not** matter that the applicants are bullish enough to present a proposal over 50 feet.

4.7 It does matter that the Council needs to address whether it can ignore an Act of Parliament.

4.8 HCRC has had advice from a community member who is a construction litigation lawyer and works alongside a team of planning barristers. The advice is that the Council has no authority to ignore, avoid or overrule any parliamentary legislation. We are happy to meet to discuss this advice further.





4.9 This is the developers section comparing the 2008 approved scheme with this application, plus we've added some red lines. These lines show it is 10% higher than approved. The applicant has stated it is 1.8m higher than the approved scheme. That is 6 feet.

4.10 The history is that we had a 1999 Planning brief that stated definitively that 3 storeys plus a roof is suitable for this site, then the 2008 scheme approved a series of blocks that were all 4 stories, but all under 50 feet. Now we have a scheme that includes 5 stories and the highest part is 56 feet.

4.11 It is an important fact that the Council has no jurisdiction to approved this scheme, but it is also important that an assessment is made on how this height increase will impact the immediate surrounding.



4.12 There is no computer-generated image submitted, just this architectural perspective. The trees are not the existing trees which are in the public park so the applicant has no control over the life of these trees, nor the planting of new trees. As this does not realistically represented the views from the park a HCRC member did a before and after photo image.



4.13 We consider this looks monstrous and destroys the setting and tranquillity of the park. Plus it will be an intrusion on the views from Barge walk and the Palace grounds damaging the soft green foreground that is established in the Thames Landscape Strategy and set out in the Core Strategy policy for Riverside Development. We haven't removed any trees or added any. We think a building should be judged on its merits not on the basis of how well trees screen it.

#### 4.14 Our Requests are:-

- **That the Council obtain legal advice, before it considers a recommendation on this application, regarding its decision-making jurisdiction to approved a scheme containing buildings over 50 feet high in breach of an Act of Parliament. The HCRC legal representative has written to the Council on 19<sup>th</sup> March 2019 on this matter and an**

**acknowledgement has been received. We look forward to hearing the Councils response.**

- **Please be aware that HCRC will seriously consider taking judicial review proceedings if a development is approved over 50 feet high.**

## 5. THE HOTEL



5.1 This is the applicants submitted CGI of the hotel and affordable housing block on the Hampton Court Way. This is the element that the public are truly shocked by. We have seen it described as a prison, a storage unit, a power station and an ugly cheap box amongst other unrepeatable names.

5.2 The EM CAAC have strongly criticised this block claiming it is “inappropriately conceived creating a tunnel effect” and we agree with them.

5.3. As this representation is from an unrealistically narrow angle, I asked my friend to produce a wider-angle image.



5.4 We will be able to see the whole of the south and west elevations of the hotel and affordable flats block, showing that the depth of the building is much greater than Hampton Court Parade opposite and it's a fair bit higher. The villa blocks behind will be wholly visible too as the group of trees currently covered by a tree preservation order are all lost. From the south this building appears of an excessive scale, and completely obliterates the view of the station and reduces the long view of the Lutyens listed bridge.

5.5 The building line is set on the back of the footway so the building appears to have landed in the wrong place. The footway is the same width as existing which is far too narrow to be used as a shared pedestrian and cycle path, plus cycle parking is proposed on the footway which will cause pedestrian conflict at this point.

5.6 The use of a different colour brick, or stripped brickwork does not break up the mass of the block that is greater than the façade of the Hampton Court Parade building opposite. Note that building is considered to be of poor architectural quality but it is at least set back from the roadway off a slip road and has a grass verge as a setting. Additionally, its roofline is broken up with variations in the ridge line and parapet created with set back and projections on the building plane.



5.7 From the north the Design Statement provides the architectural perspective above. It shows a flat undistinguished north elevation enclosing the station forecourt, which we consider damages the setting of this historic building. It shows the conflict with the historic station canopy which barely misses it, being approximately 300mm off. This will make maintenance difficult.



5.8 The Design Statement also shows us how the long unmodelled east elevation, rises up at the back of the platform edge, producing a long solid mass and sitting clumsily very close to the Victorian canopy.

5.9 We maintain that the hotel building is a monstrosity that will seriously damage the edge of the Kent Town CA, form a solid urban mass reminiscent of inner London, or a greenfield industrial estate, leaving a poor impression to passers-by entering or leaving the borough.

5.10 We have strong ideas on what comprehensive changes are needed on this block including:-

- It is too tall, higher than the 2008 approval, higher than the Hampton Court Parade building opposite, at minimum the 4<sup>th</sup> floor needs setting back.
- The building line needs to be set back, the plan form made shallower, and taken away from the station canopies, the strange splay at the southern end removed, and the footway widened.
- The elevation and roofline need to be broken up.
- The north elevation needs to step down to the station and respect the stations façade in the scale of the openings and features.
- There needs to be more ground floor interest on all elevations.
- It needs softening with landscaping.

**5.11 Our request is we ask the Council to agree this element cannot be tinkered with, in its brick colour, balcony design or other minor elements. It requires a comprehensive reduction in height, scale and design.**

## 6. THE RIVERSIDE BUILDING, STATION SETTING & PUBLIC SPACE

6.1 The northern part of the site is the element the applicant has used to promote the scheme and we agree that it is an improvement over the 2008 approved scheme. But, the Council Leader at the time did tell the press that the scheme was “just about OK” and we feel the designers this time have missed many opportunities.

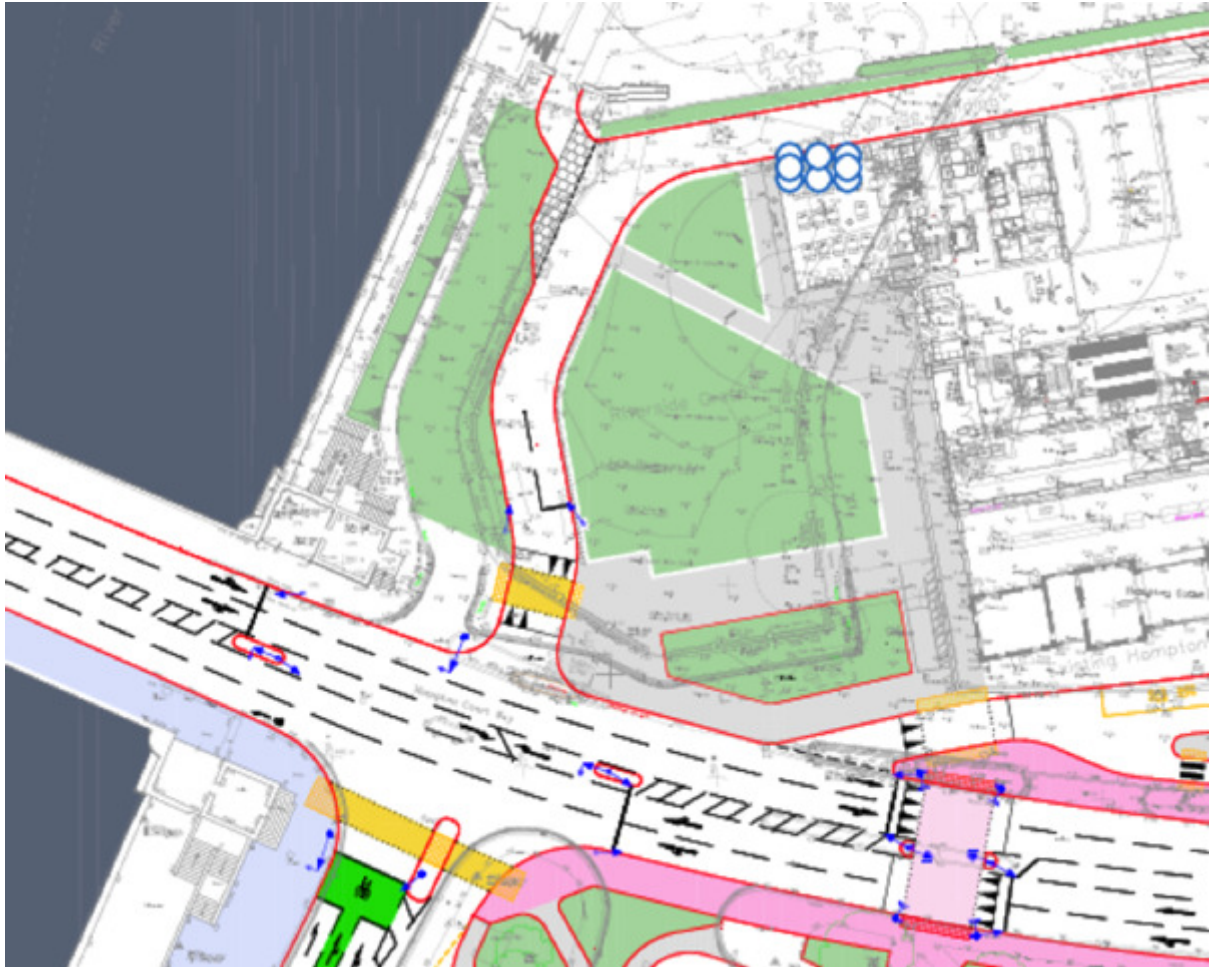


6.2 The landscape master plan shows new areas of open space near the river, and a large z shape block of more residential with a retail and café unit. The sole access to the site runs through this space. It involves repositioning the park maintenance access road owned by Surrey County Council, and we have concerns that this commercial development is being facilitated by public land.





6.3 This open space extract shows four pieces of green, fragmented by the main access road and pedestrian paths. It is not a space that could be conceived as a Square. The materials list shows upstands around the lawns presumably to protect users from vehicles. The bank down to the mooring platform, located inside the railings, is included in the site which is probably environment agency land. The black metal railings were put up in the 1950's, and not as part of the 1930's bridge work and lock the bank so that it cannot be maintained. It is full of self-seeded trees that need to be removed and the space together with the extremely narrow pedestrian, path annotated as 8, need to be incorporated into the open space, with the railing relocated to the mooring platform retaining wall. This is not a detail that should be subject to a condition.



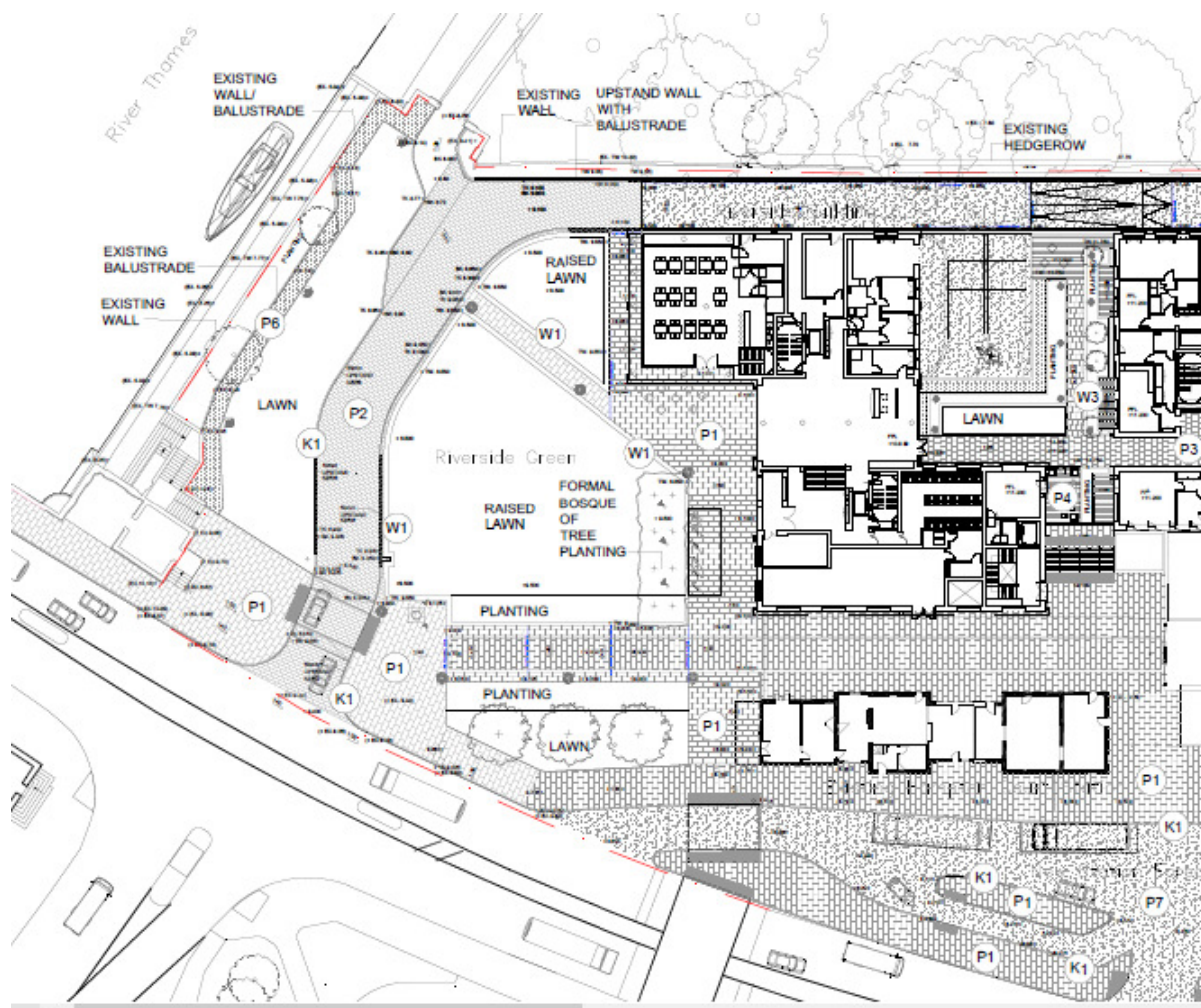
6.4 Looking at the highway layout we can see the landscape plan conveniently forgets to show a set of traffic lights, a raised table and a drop off layby on this access road. No doubts there will be much signing clutter too. We think this will be a hazardous space to use and will be visually fragmented and cluttered. This is how we think it will look.



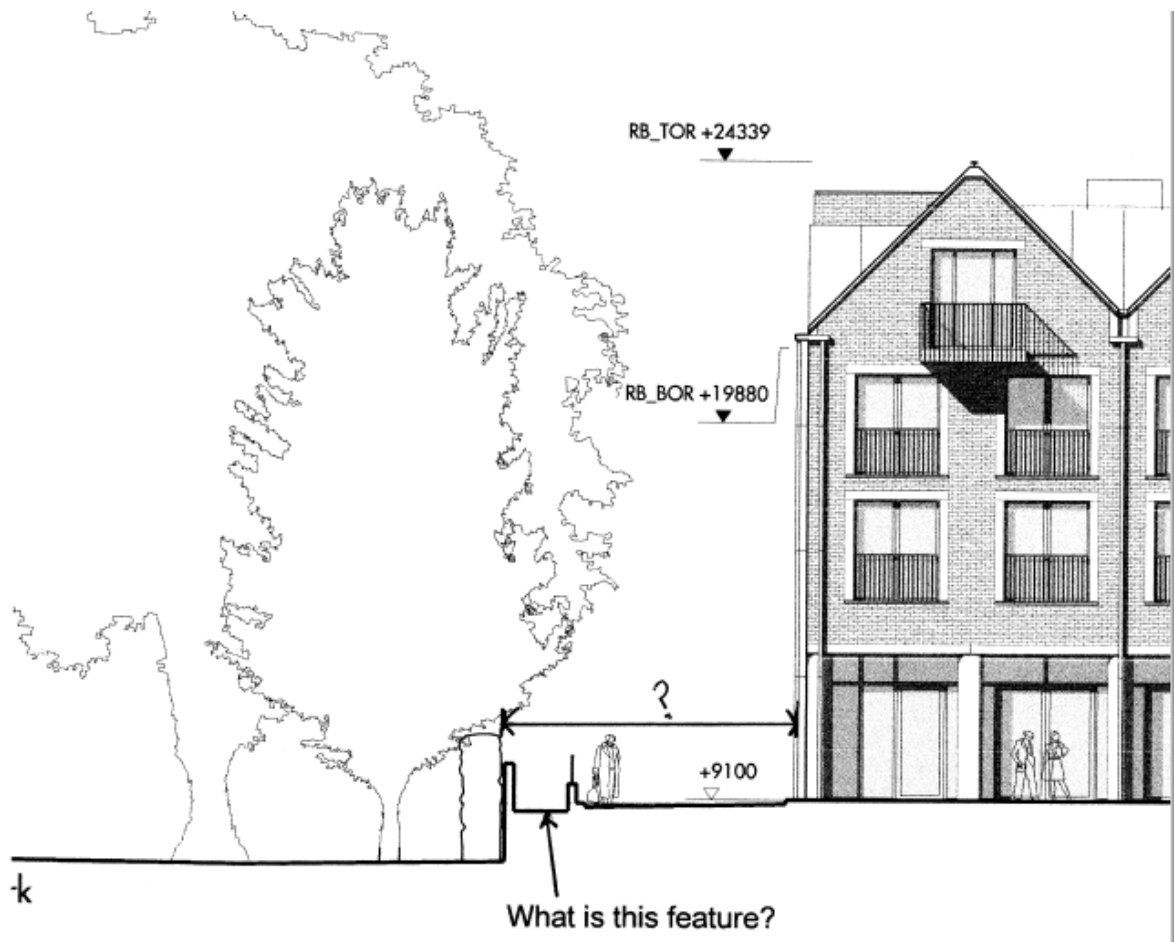


6.5 We consider it is **not** a user-friendly space, it is dominated by traffic and has no connectivity to the existing park. The open space has some visual merits, but it does not meet our long-term objectives of linking the river, the bridge and the pedestrian routes to the park both visually and functionally.

6.6 The access road positioning and levels are determined by the basement car park ramp beneath this space and result in the access road being set at least 1m above the existing levels and floating above the park. This requires a new retaining wall with balustrading which is not shown on the Landscape Master Plan or in any images including the CGI or colour perspectives. The open space is shown as a neat flat area but it will have a one metre ramp across it, which then dips down to the access road along the hedge, in which there is a pedestrian access gate into the public park. This is a visual nightmare, and a high-risk pedestrian route. See the images below from the submitted documents.



6.7 See the annotation for existing wall along the park boundary adjacent to the Lutyens obelisks and path entrance. This is a 1950's derelict graffiti covered wall of no interest containing window openings that should be removed to open up the views of the park. A new "Upstand wall with balustrade" is annotated within the application site leaving a landlocked gap. The levels around the walls and raised road have not been given due regard in relation to the park. The park at the pedestrian gate in the hedge is on average 7.8m AOD, and at the barrier entrance at the Lutyens obelisks it is 8.2m AOD. The proposed access road is at 9.1m AOD within 300mm of these adjacent lower levels. Thus, the road needs an upstand retaining wall to hold back the 1-1.3m difference in land. This is going to be a visual block to the park whereas it has been expressed to the developers by HCRC and HRP that the objective is to open up views of the park for visual and functional improvements.



6.8 This is the applicants amended elevation and access road section showing the dead piece of land between the two walls. Note the existing hedge will no doubt be lost to construct the temporary car park, and the close proximity to the mature trees, the canopy of which overhangs the access road must put the trees at risk. This open space proposal does not safeguard our public park, and will definitely isolate it further.



6.9 The new open space is enclosed by a large building that has a very geometric solid feeling, which is partly a result of its positioning that relates solely

to the villa blocks behind it. It does not address the river. It should be aligned parallel to the river. It has a 12m wing projection beyond the single storey part of the station. It overpowers the station in height and with its assertive repeated 5 gables, its overlarge window openings and the top heavy 4<sup>th</sup> floor balconies. Note the access road appears to be set at a level related to the Lutyens red brick and stone walls attached to the obelisks, but this level is in fact nearing 1m lower than the road level. The hedge is shown on the line of the existing hedge. This is the hedge HCRC would like removed to open views. Instead we will be faced with a dead gap and a new retaining wall with balustrade which is not shown in this CGI. **This CGI should be withdrawn from the application documents.**



6.10 The longer views from the bridge show how the excessive scale dwarfs the station. In our opinion it sits uncomfortably with the river frontage and the Surrey end of the listed Lutyens bridge, which includes the attached listed embankment and mooring walls, and the obelisks at the park entrance. This is to the detriment of the setting of the grade 2 listed building, which the Council has the duty to preserve, as advised by Historic England.



3605\_1109 version 190218  
Hoxton Court Station (Planning) (Thames-Rain National Trail near Saffron Park - Proposed alterations)

m3erharc

6.11 This view from Barge walk is disturbing and shows the context with Creek Road and Bridge Road, to the right in the backdrop to the Lutyens bridge, which sits as well articulated and varied small building blocks. We have removed three chestnut trees in the Barge Walk view as we know these are at the end of their life, as 4 have been lost in recent years.



6.12 A view along Creek Road is identified as an important view in the Kent Town CA Management Plan, together with an adopted policy to protect this view. We felt the view in the Design Statement was too long, so we have zoomed in. These before and after images show how the view of the station, currently silhouetted with a back drop of mature trees, is completely lost as it merges into the solid dark roof and dormer windows of the riverside building behind it. There would be no point in reinstating the finials and chimneys as they would be



lost against the backdrop. The loss of this view is detrimental to the character and appearance of the East Molesey (Kent Town) Conservation Area.

**6.12 Our Request is that we ask the Council to agree that the that the new square has a limited contribution both visually and functionally, that it is set at a raised level that is determined by the basement car park design, so that it will not relate to the adjacent park. The riverside building enclosing the open space is poorly conceived to the detriment of the setting of the station, the listed bridge, and the Kent Town Conservation Area.**

### **Conclusion**

**I have presented on behalf of HCRC five requests which form our conclusion. This proposal is, in our opinion, detrimental to the setting of the listed Lutyens Bridge and its attached structures, detrimental to the setting of the locally listed station which is currently being considered for inclusion on the National Register of Listed Buildings, and fails to preserve or enhance the character and appearance of the East Molesey (Kent Town) Conservation Area**

**Karen Liddel BA(Hons) MRTPI(rtd) IHBC(rtd)**

**On behalf of Hampton Court Rescue Campaign.**