

**Our reference:** COM104916229

**Application number:** 2018/3810

**Application address:** Jolly Boatman And Hampton Court Station Redevelopment Area, Hampton Court Way, East Molesey, Surrey, KT8 9AE

**Name:** Mr warshaw

**Address:** Marpessa Ash Island Thames E Molesey KT7

**Comment type:** You object to the planning application

**Date of comment:** 06 Feb 2019

**Comment:** Chartered Architects and Planners  
CONSERVATION ARCHITECTURE.&.PLANNING  
HAMPTON COURT STATION APPLICATION

I occupy a residential mooring at Ash Island, East Molesey. I visit, use and enjoy many places around the area. It is of unique cultural heritage value in its parts and as a whole. Both would be harmed by the proposed development.

Hampton Court Palace is among the UK's foremost monuments and second most visited Royal site, with around 1m last year, exceeded only by the Tower of London. It is of international importance. It is, inexplicably not yet a World Heritage site, but is being promoted as such. The Palace and Gardens are both Grade I listed and lie within a conservation area. The conservation area also contains a number of other listed buildings. The bridges connecting both sides of the Thames and Cigarette Island to the mainland are also listed. The entire ensemble forms a dynamic and ongoing memorable experience to millions of people and is comparatively little changed over centuries.

Hampton Court Station is currently locally listed and lies within a conservation area. Inexplicably, although built in 1840 it is not listed. In view of the clear threat of substantial harm to its setting, it should urgently be considered for statutory listing. Its setting is severely harmed by the proposed development.

The proposed development condemns itself in its very illustrations. Its bulk, height and scale would dominate and obscure the Station's verdant background, impose itself between important views to and from the Palace and Gardens, and bridges, as well as views within and without two conservation areas. The development would cause substantial harm to the settings of these national monuments, several listed building and the character of two conservation areas. There are no exceptional circumstances which outweigh the statutory duty to give special attention to preserving listed buildings and their settings.

Even if it were to lie within "less than substantial" territory, it is well established in case law that, where there is little or no benefit to the public interest, proposals that clearly cause harm should be refused. The proposed development is composed of monolith forms which exceed the height, scale and bulk of their surroundings. Roofscapes in particular are, in context relatively unrelieved. The evident attempt to maximise floorspace and profit clashes with statute, policy and guidance with no mitigating benefits or circumstances. The result is a crass behemoth which neither preserves nor enhances anything around it. The product of finally ridding the area of a prominent derelict site does not justify a scheme of such magnitude. It should be apparent from the drawings that 4 stories of largely continuous building is totally alien to the predominant architectural character of its surroundings which have given rise to its heritage qualities.

The supporting Heritage Statement, notwithstanding its outward appearance as a lengthy and

rigorous document, is clearly a post-hoc justification from beginning to end. The clear attempt is to list so-called “benefits” whilst not bothering to even acknowledge, let alone assess the true impact of the development itself on setting, thereby degrading and intervening negatively in the comprehension of significance within an essentially small scale, low level land and riverscape. Where significant harm is evident, the Statement invariably marks it as negligible or minor. Illustrative viewpoints are carefully selected to avoid revealing serious harm. No regard is paid to the obvious fact that view and experience is dynamic, not limited to static viewpoints, and that harmful impact is therefore liable to be cumulative in most observers' comprehension. The argument advanced that developing the derelict and neglected areas alone is itself enhancing fails to address the far greater negative impact of the proposed bulk, height and scale on the entire future life of the heritage assets and the ability of all future observers, residents and visitors to experience their significance.

There is also an attempt in correspondence to fob off Historic England's identification of issues which should be carefully assessed, not simply referred to selected views created to “sell” the scheme to decision makers. Heritage Statements should be seen to be independent of a development's promoters. This one does not reassure as such. Historic England should either undertake its own rigorous assessment or commission a genuinely independent one.

The development is too large, high, impermeable and inarticulate to preserve settings and characters identified. It breaches statute, national and local policy. Its so-called “benefits” do not outweigh the harm. It should be a storey lower, less dense, composition more sensitively scaled. I urge your Council to refuse this application.

Yours sincerely

JACK WARSHAW RIBA(SCA) MRTPI IHBC