

Heritage Assessment Methodology

The following outlines the methodology that has been used to assess the impact of the proposed development on the heritage assets that surround the site. Firstly all 'Receptor's' (Heritage Assets) have been awarded a 'Value' that provides an indication of their significance. The table below sets out the criteria for each of the Receptor Values. In making an assessment on the proposed impact the Council has followed the same methodology as the application, although there are some alterations.

Receptor Value

Receptor Value	Heritage Receptor Value (HR)	Townscape Receptor Value (TR)	Visual Amenity Value (VA)	Examples
	Criteria	Criteria	Criteria	
Exceptional	Of international significance	Outstanding townscape, dominance of quality materials, very strong urban structure/ grain, unique sense of place, no detracting features	Identified strategic views and/ or views of national or international importance	HR – Includes Grade I and II * listed buildings TR - Internationally or Nationally recognised VA – Views of national or international importance
High	Of national significance	Very attractive townscape, evident use of quality materials, strong urban structure/ grain, strong sense of place, occasional detracting features	Identified views and/ or views of national or international importance	HR – Includes Grade I and II* listed buildings. TR- Nationally, Regionally or District recognised VA - Views of national or international importance
Medium	Of national significance	Attractive townscape, recognisable urban structure/ grain, some features worthy of conservation, a sense of place, some detracting features	Supplementary planning document identified views including conservation area appraisals and/ or views of regional or local importance	HR – Includes grade II listed buildings and conservation areas. TR - Regional, District or Local recognised VA – Views of local or regional importance

Low	Of national and/ or regional significance, or local asset of particular significance	Commonplace townscape, noticeable urban structure/ grain, limited features worthy of conservation, some dominant detracting features	Views within ordinary townscape value	HR – Includes grade II listed buildings, conservation area and buildings of local interest TR - District or Locally recognised VA – Views of local interest
Very Low	Some evidence of significance, of local interest and generally with no statutory protection	Run down townscape, weak urban structure/ grain, no features worthy of conservation, frequent dominant detracting features	Views within very low townscape quality	HR – Includes predominantly buildings of locally interest and elements of townscape merit TR - No formally recognition VA – Views of no interest

Following the award of a 'Receptor Value' each receptor is then scored according to its susceptibility to change. The criteria for that assessment is below.

Susceptibility (to Change)

Low	The receptor has a high ability to accommodate the proposed development and/ or the receptors setting may make a negative contribution and/ or intervening development, distance or topography may block any relationship with the proposed development.
Medium	The receptor has a medium ability to accommodate the proposed development and/ or the receptors setting may make a neutral contribution and/ or intervening development, distance or topography may block or allow a visual relationship with the proposed development.
High	The receptor has a low ability to accommodate the proposed development and/ or the receptors setting may make a positive contribution and/ or intervening development, distance or topography may allow a visual relationship with the proposed development.

Finally, the 'Magnitude' of the impact of the proposed development is then considered for each receptor. The criteria for that assessment is below.

Magnitude (effect of change on Receptor)

High	Considerable change to the value of the receptor. The proposed development would range from a notable change in receptor characteristics over an extensive area to an intensive change over a
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	limited area. The proposed development would be very noticeable. There would be a loss of or major alteration to key elements/ features or characteristics, the duration of which may be permanent and non-reversible.
Medium	A clearly discernible change to the value of the receptor. The proposed development would be dissimilar to a main component of the receptor, but similar to other components. The proposed development would be readily noticeable. There would be a partial loss of or alteration to key elements/ features or characteristics, the duration of which may be semi-permanent and partially reversible.
Low	Slight change to the value of the receptor. The proposed development would be similar to the main component of the receptor, but dissimilar to the other components. The proposed development would not be readily noticeable. There would be minor loss of or alteration to one or more key elements/ features and characteristics, the duration of which may be temporary and reversible.
Negligible	Barely discernible change to the value of the receptor. There would be minor loss of or alteration to one or more key elements, features and characteristics.
Nil	No change to the value of the receptor

Lastly, the two tables below provide a likely affect of the development on each receptor. The receptor value and susceptibility are first entered to provide a sensitivity reading. This is then entered into the second table along with the magnitude value to provide a 'Likely Effect'.

Sensitivity table

Receptor Value	Susceptibility		
	Low	Medium	High
Very Low	Low	Low	Low/ Moderate
Low	Low	Low/ Moderate	Moderate
Medium	Low/ Moderate	Moderate	Moderate/ High
High	Moderate	Moderate/ High	High
Exceptional	Moderate/ High	High	High

Likely Effect (of Proposed Development)

Magnitude	Sensitivity		
	Low	Moderate	High
Nil	None	None	None
Negligible	Neutral/ Negligible	Neutral/ Negligible	Neutral/ Negligible
Low	Minor	Minor/ Moderate	Moderate
Medium	Minor/ Moderate	Moderate	Moderate/ Major
High	Moderate	Moderate/ Major	Major

Following the above assessment, a 'likely effect' has been determined for each asset, however this is neither beneficial nor adverse. A further assessment is then provided to translate the 'likely effect' into one of the categories in the table below. Where necessary justification is also provided to

outline each conclusion and the potential benefits associated with the development are also considered.

Major Beneficial	The scheme would be in keeping with and would provide a major improvement to or reinforce the value of the receptor.
Moderate Beneficial	The scheme would be in keeping with and would provide a noticeable improvement to or reinforce the value of the receptor.
Minor Beneficial	The scheme would be in keeping with and would provide a slight improvement to or reinforce the value of the receptor.
Neutral/ Negligible	The would have no effect on the value of the receptor or would be barely perceptible/ in keeping with and would maintain the value of the receptor.
Minor Adverse	The scheme would have a minor negative effect to the value of the receptor
Moderate Adverse	The scheme would cause a noticeable deterioration in the value of the receptor.
Major Adverse	The scheme would cause a major deterioration in the value of the receptor.

Townscape Assessment

The Environmental Statement: Volume 3 provides the Townscape and Visual Impact Assessment. The Townscape receptor impact is shown in Table 7.3 of that document and is divided into 8 Character Areas. The results of this assessment are reproduced in the table below.

<i>Character Area Number</i>	<i>Character Areas</i>	<i>Likely Effect (Operation)</i>
1	Historic Palace and Garden	Long Term Minor Beneficial
2	Thames and Riverbank	Long Term Minor Beneficial
3	Hampton Court Green	Long Term Neutral/ Minor Beneficial
4	Movement Corridor	Long Term Minor Beneficial
5	Public Park	Long Term Moderate Beneficial
6	Town Centre/ Commercial	Long Term Minor Beneficial
7	Low Density Planning Residential	Negligible/ Neutral
8 (A + B)	Low Density Mixed Residential	Negligible/ Neutral

Character Area 1 covers Hampton Court Palace and its gardens. Parkland surrounds the Palace to the north and east and make a positive contribution to its setting. To the south and west the setting has a greater amount of urban landscape, including the townscape of East Molesey and Hampton Court Bridge. This gently transitions into open space and vegetation as you move to the east along the Thames where views of the Palace gardens are evident. Within this area lies Cigarette Island and Ditton Field both of which add positively to the setting of the Palace. The relationship of the Palace, the river

crossing and East Molesey are described by the applicant with their 'Heritage, Townscape and Visual Impact Assessment' on page 34 as 'contributing positively to an understanding of the Palace's heritage value, contextualising its historic development'.



Historic Map of Hampton Court (later 19th Century)

The map above shows the setting of Hampton Court Palace in the later part of the 19th century. Clearly the application site, Cigarette Island and their relationship have not altered in some 130 to 150 years. The green buffer that is created on the opposite side of the river allows visitors of the Palace to consider and experience the site in a semi-rural setting similar to how it would have appeared when originally constructed.

The application assessment indicates that this character area will benefit from the development as the approach to the Palace will be improved and the new buildings will provide an enhancement. Officers agree that the route to the Palace will be improved, which is considered a benefit. However, the views out from the Palace and its grounds will be altered and therefore its setting affected. The existing green setting which the application site currently provides as the back drop to the Palace, will be interrupted with built form. The views and appreciation of the Palace and its grounds will be for ever altered to its detriment.

This effect on the setting of the Palace and its grounds would result in an adverse impact on this Character Area. The size of the character area is noted and that the setting of the Palace is also formed by parts of this character area that are not affected by the development.

Character Area No.	Receptor Value (TR)	Susceptibility to Change	Magnitude	Likely Effect	Beneficial or Harmful
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1	Exceptional	Medium	Medium	Moderate/ Major	Moderate Adverse
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Character Area 2 covers the River Thames and its riverbank. The Townscape Assessment discusses the removal of an unattractive element from the riverbank (Officers assume this is a reference to the hoardings) and that the area will be animated by high quality architecture with active uses on the ground floor. These advantages are not within this character area and lie within Character Area 4, which includes the application site. The scale and massing of the development is considered to have an adverse impact on the openness of the rivers setting and the architecture is not of such an outstanding quality that it overcomes these problems. With that said, the location and design of the buildings is an improvement over the previously approved scheme, but they are still close to the river, they will be clearly visible when moving along it and from the other side of the Hampton Court Palace side.

Character Area No.	Receptor Value (TR)	Susceptibility to Change	Magnitude	Likely Effect	Beneficial or Harmful
2	High	Medium	Medium	Moderate/ Major to Major	Moderate Adverse

Character Area 3 covers the area on the northern side of the river Thames and to the west of Hampton Court Palace. This area is unlikely to be affected by the development. Whilst the application assessment suggests that wayfinding will be improved, Officers are unclear how this relates to this character area, given that the Palace is easily recognisable. This area is part of the Hampton Green conservation area and from its southern and eastern boundaries would have some views of the development, although these would be broken by Hampton Court Bridge, existing townscape/ trees and that there is a change in level.

Character Area No.	Receptor Value (TR)	Susceptibility to Change	Magnitude	Likely Effect	Beneficial or Harmful
3	Medium	Low	Negligible	Neutral/ Negligible	Neutral Negligible

Character Area 4 covers the application site, Hampton Court Bridge and Hampton Court Way stretching to the south. The application assessment considers this area would see a major benefit. The East Molesey Kent Town Conservation Area appraisal identifies a number of negative features about the general area of the Jolly Boatman site and Cigarette Island Park, which are as follows:

- The neglected and unkempt site of the Jolly Boatman
- Large incongruous advertising hoardings to the station car park
- Poor condition of the main railway terminus building (paint peeling from windows, modern wire trunking, poorly designed lighting and modern shop windows and poorly designed shop awning)
- Large unrelieved tarmac frontage to Hampton Court Way

- Conflict between vehicles and pedestrians on Hampton Court Way (a very busy thoroughfare)
- Poor quality environment for the visitors arriving at Hampton Court Station

The proposed development addresses all of the above, except the poor condition of the Railway Station building. Officers consider that there are further benefits to the scheme in the form of the new public realm (further assessed under Viewpoint 8), but within this character area the works also create harm, notably due to the massing and design of the proposed development and the impact on the setting of the Railway Station building. In total the harm caused is not considered to be outweighed by the benefits of the development.

Character Area No.	Receptor Value (TR)	Susceptibility to Change	Magnitude	Likely Effect	Beneficial or Harmful
4	Medium to Low	Medium	Low	Minor to Minor/ Moderate	Minor Adverse

Character Area 5 covers Cigarette Island and the green space to the south east of the application site. The Townscape Assessment notes that the accessibility of Cigarette Island will be improved through the layout of the development and that surveillance will enhance the way the space functions. Officers agree that the usability of this area will be enhanced through the development, however there is also a level of harm created through the scale and massing of the development which forms a hard edge to the northern part of the character area. A large section of this character area would be less affected by the development. The harm is considered to be offset by the vitality and improved accessibility that the development creates.

Character Area No.	Receptor Value (TR)	Susceptibility to Change	Magnitude	Likely Effect	Beneficial or Harmful
5	Low	Medium	Medium	Minor/ Moderate to Moderate	Neutral/ Negligible

Character Area 6 includes Bridge Road and part of Creek Road and a large part of this character area is within the Kent Town conservation area. The majority of this area is separated from the development by existing townscape. The eastern boundary faces the development which will impact on the existing character of this area (the impact of the development on views out of this character area are assessed in viewpoints 9 and 10). The scale and massing of the development does not reflect the character of this character area, but it is separated by the large and busy Hampton Court Way. The proposed public realm will enhance the north east corner of this character area which already, in the summer months has a vibrant retail presence. The benefits to the development are considered to lessen the overall level of harm.

Character Area No.	Receptor Value (TR)	Susceptibility to Change	Magnitude	Likely Effect	Beneficial or Harmful
6	Medium	Medium	Medium	Moderate	Minor Adverse

Character Area 7 covers Hurst Road, Palace Road, Wolsey Road and a number of others, most of which are within the East Molesey Kent Town Conservation Area. These are residential streets that have little connection to Hampton Court Way and the application site and therefore their character would be unaffected.

Character Area No.	Receptor Value (TR)	Susceptibility to Change	Magnitude	Likely Effect	Beneficial or Harmful
7	Medium	Low	Negligible	Neutral/ Negligible	Neutral

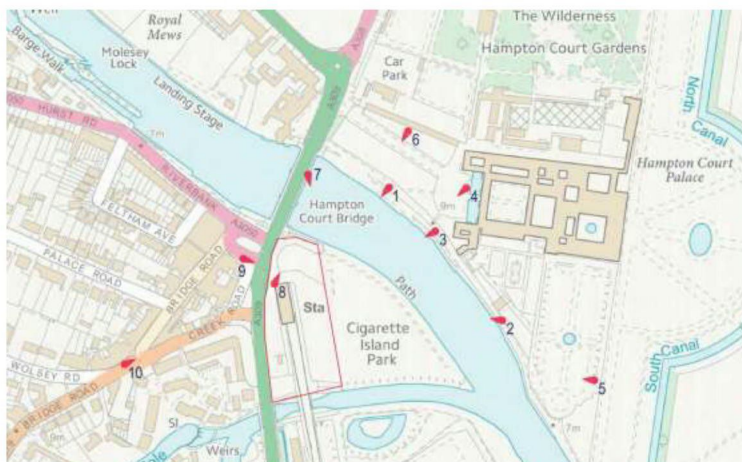
Character Area 8 (A + B) include Bridge Road, Molemer Road, Summer Road, Aragon Avenue and a number of others. The proposed development is unlikely to be seen, except from the eastern edge of 8A. Much like Character Area 7, these streets have little connection to the application site and their character will remain unaffected.

Character Area No.	Receptor Value (TR)	Susceptibility to Change	Magnitude	Likely Effect	Beneficial or Harmful
8	Low	Low	Negligible	Neutral/ Negligible	Neutral

The Environmental Statement: Volume 3 provides further townscape impact assessment in the form of the 'The Visual receptor' impact shown in Table 8.1. This assessment uses 10 different views (plus one additional view added at the request of Officers) taken around the site. The results of applicants assessment are reproduced below.

<i>Viewpoint Number</i>	<i>Viewpoint Location</i>	<i>Likely Effect (Operation)</i>
1	From the Thames path national trail, on the north side of the Thames	Moderate Beneficial
2	From the Thames path national trail, on the north side of the Thames, near to the Banqueting House	Negligible – Minor Beneficial
3	From the Thames path national trail, on the north side of the Thames, near to the exit to the Palace grounds	Moderate Beneficial
4	From within the Palace grounds, near to the entrance to the west frontage of the Palace	Minor Beneficial
5	From within the Palace grounds, south east of the Privy Garden	Negligible
6	Within the Palace grounds, near to the exit to the Palace public ticket office	Negligible – Minor Beneficial

7	Looking south east from midway along Hampton Court Bridge	Moderate – Major Beneficial
8	From the service road adjoining the western edge of Hampton Court station, within the Conservation Area	Major Beneficial
9	Western side of Hampton Court Way from within the Conservation Area	Major Beneficial
10	Corner of Wolsey Road at its junction with Bridge Road and Creek Road from within the Conservation Area	Negligible – Minor Adverse
11 (Addendum)	From outside the Petrol Station on Hampton Court Way looking north	Major Beneficial



Viewpoint locations

As with the previous study, it is considered that the applicant's conclusions on these views are overly positive. Views from within the Palace interior have not been included as separate viewpoints, however it is considered that the general arrangement of views provided offers an understanding of those potential impacts. Furthermore, Officer site visits were carried out to view the development site from all viewpoints requested by Hampton Court Palace at a time when the trees were in leaf and a second visit to see the views in the winter months when the trees were bare. A visit was also carried out after sunset from outside the Palace and surrounding the development site to consider night time views.

The viewpoints have all been photographed within the summer months when the leaves remain on the trees and also during the day time when the impact of the additional lighting is not considered. Officers have considered the impact of the development both in the winter months when leaves no longer form a perceived visual barrier and also at night when the development will emit a

greater level of light. Commentary on these further assessments is provided under each viewpoint.

Viewpoint 1 is taken from directly across the river where the trees on Cigarette Island would partially obscure the development in the summer months. However, in the winter months the development would be clearly visible. This view is integral to the setting of Hampton Court Palace as are many on this side of the river. Given the view is with the Palace behind the relationship of Palace to development is lessened, hence the Minor conclusion.

Viewpoint No.	Receptor Value (VA)	Susceptibility to Change	Magnitude	Likely Effect	Beneficial or Harmful
1	Medium	Medium	Medium	Moderate	Minor Adverse
Night and Winter	In the winter months the lack of leaves on the trees will increase the prominence of the proposed development and it is likely that light emanating from the development at night will also increase its prominence.				

Viewpoint 2 is taken from the Thames path national trail towards the development site and Hampton Court Bridge. The applicant's assessment relies heavily on the existing tree screening. The applicant has also agreed to plant additional trees in Cigarette Island Park to further soften the appearance of the development. However, it is considered poor practice to base the acceptability of developments heavily on tree screening. As with other views from this side of the river the massing is considered harmful to the setting of Hampton Court Palace and also to Hampton Court Bridge. However, given the view is with the Palace behind the relationship of Palace to development is lessened, hence the Minor conclusion.

Viewpoint No.	Receptor Value (VA)	Susceptibility to Change	Magnitude	Likely Effect	Beneficial or Harmful
2	Medium	Medium	Medium	Moderate	Minor Adverse
Night and Winter	In the winter months the lack of leaves on the trees will increase the prominence of the proposed development and it is likely that light emanating from the development at night will also increase its prominence.				

Viewpoint 3 is taken from outside the Privy Gardens where trees are again considered to obscure the development. The public realm improvements adjacent to the bridge will be evident. As with Viewpoints 1 and 2 the trees in the summer months would provide a greater level of screening than in the winter. The visibility of the development in this view interrupts what is otherwise an undeveloped vista (except to the far right) and this urbanisation if the Palaces setting is considered harmful. However, as with Viewpoints 1 and 2, given the view is with the Palace behind the relationship of Palace to development is lessened, hence the Minor conclusion.

Viewpoint No.	Receptor Value (VA)	Susceptibility to Change	Magnitude	Likely Effect	Beneficial or Harmful
3	Medium	Medium	Medium	Moderate	Minor Adverse
Night and Winter	In the winter months the lack of leaves on the trees will increase the prominence of the proposed development and it is likely that light emanating from the development at night will also increase its prominence.				

Viewpoint 4 is taken from within the Palace grounds, near to the west entrance at the front of the Palace. As with other viewpoints the tree screening is considered important. The development would be visible and as with some of the other viewpoints the benefits created from the removal of the existing hoarding has been over stated. This view is key to the setting of the Hampton Court Palace and the affect of the scale and massing of the development would impact on the appreciation of the Palace and its grounds. The development would be seen in conjunction with the front elevation of the Palace. Whilst the trees on both the application site and within the grounds of Hampton Court Palace provide some screening, plus there is additional distance over Viewpoints 1, 2 and 3, the visually connection (and the impact of light emanating at night) between the development and the Palace has lead to a Moderate conclusion.

Viewpoint No.	Receptor Value (VA)	Susceptibility to Change	Magnitude	Likely Effect	Beneficial or Harmful
4	High	Medium	Medium	Moderate to Moderate/ Major	Moderate Adverse
Night and Winter	In the winter months the lack of leaves on the trees will increase the prominence of the proposed development although the additional distance helps to lessen the impact. Light emanating from the development at night will also increase its prominence.				

Viewpoint 5 is taken from within the Palace grounds to the south east of the Privy Garden where the tree screening is greater than in some of the other viewpoints, which restricts views of the development. Further as with Viewpoint 2, this angle allows for views of the full extent of the development to be apparent. This view is currently void of built form, the distant trees provide a rural feel to the view that would be interrupted by the proposals which would harm the setting of the Palace.

Viewpoint No.	Receptor Value (VA)	Susceptibility to Change	Magnitude	Likely Effect	Beneficial or Harmful
5	High	Medium	Medium	Moderate to Moderate/ Major	Moderate Adverse
Night and Winter	In the winter months the lack of leaves on the trees will increase the prominence of the proposed development although the additional distance helps to lessen the impact. Light emanating from the				

	development at night is less likely to be visible in this view due to the thickness of the tree screen and distance.
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Viewpoint 6 is taken within the Palace grounds, near to the exit to the Palace public ticket office. The tree screen in this view provides a lesser screen than the applicant indicates and again, the impact of the removal of the hoardings is over exaggerated as they are a small element in what is a large tree lined view, with the bridge to the righthand side and the buildings of Creek Street behind. The trees that provide the greatest level of screening are located on the Hampton Court Palace side of the Thames. The scale and massing of the development would be clear in this view, which like Viewpoint 4 is of greater importance than some of the other viewpoints. This view provides a feel for the approach to the Palace and the experience visitors have on arrival. Whilst the viewpoint is to the south of the Palace frontage the overall the development is considered to adversely impact the approach and the setting of the Palace.

Viewpoint No.	Receptor Value (VA)	Susceptibility to Change	Magnitude	Likely Effect	Beneficial or Harmful
6	High	Medium	Medium	Moderate to Moderate/ Major	Moderate Adverse
Night and Winter	In the winter months the lack of leaves on the trees will increase the prominence of the proposed development although the additional distance helps to lessen the impact. Light emanating from the development at night will also increase its prominence.				

Viewpoint 7 is taken from Hampton Court Bridge and shows the proposed Riverside Building and Hampton Court Way Building behind the existing Railway Station building. The application assessment considers the existing site to be an incoherent and unattractive element in the townscape, with the hoardings to the north of the site creating a dead frontage. The 'negative' elements of this view are vastly over stated, whilst the hoardings are visible so are the traditional single storey buildings behind and the station building, which are entirely appropriate in this setting. The proposals seek to erect a 4-storey building that engulfs the station building. The scale, massing and design of the proposals is out of keeping with the area and not considered to be of the exceptional quality that would be required on this site. The increase in scale and massing has a negative impact on the openness of this view which describes the connection of the bridge to East Molesey. Furthermore additional harm would be caused at night from the light emanating from the development, drawing attention to the development.

Viewpoint No.	Receptor Value (VA)	Susceptibility to Change	Magnitude	Likely Effect	Beneficial or Harmful
7	Medium	Medium	High	Moderate/ Major	Major Adverse
Night and Winter	In the winter months the visibility of the development will remain is in the summer as there is no tree screen in this view. Light emanating from the development at night will also increase its prominence and				

	will cause an obvious difference to the view. Currently light from the development site is minimal, this increase will adversely alter the setting of the bridge thereby increasing the harm.
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Viewpoint 8 is taken from the site entrance looking across the development site. The viewpoint does not include the proposed development, only the public realm that is to be created. The application assessment suggests the development would result in a Major Beneficial effect. Officers have some reservations about the applicant's consideration that the existing hoardings are a permanent feature in the street scene. And, the extent to which the tree belt along the river is depicted in the proposed view. However, whilst the development has been considered to harm the setting of Hampton Court Bridge (in views from the bridge to the development) it does not in this view. In this view the Bridge becomes more visible, which is considered to better reveal its significance. Also, Hampton Court Palace may be visible through the trees, which enhances the approach for visitors. Despite the points of dispute Officers acknowledge the proposed development would provide improvement over the existing situation, due to the creation of a useable area of public realm and the new views of the Bridge and Palace that would be created.

Viewpoint No.	Receptor Value (VA)	Susceptibility to Change	Magnitude	Likely Effect	Beneficial or Harmful
8	Very Low	Low	High	Moderate	Moderate Beneficial
Night and Winter	In the winter months the lack of leaves would therefore allow views across to Hampton Court enhancing its setting. The lighting of the public realm is unlikely to have any additional impact.				

Viewpoint 9 is taken from the western side of Hampton Court Way from within the East Molesey Kent Town Conservation Area. This view is of the existing hoardings to the front of the site and the train station building to the right-hand side. The proposed Riverside building would be a prominent feature in this view and reduces the existing dominance of the Railway Station building. From this angle the impact of the development on the Railway Station building is lessened as it is not seen directly behind. The development is not seen in connection with the Palace and the scale, massing and design is seen out of context with the existing townscape located behind the viewer. The improvements to the public realm also would be clear from this position and are an enhancement. Out of context the impact of the development is considered lessen, hence a Minor conclusion.

Viewpoint No.	Receptor Value (VA)	Susceptibility to Change	Magnitude	Likely Effect	Beneficial or Harmful
9	Very Low	Medium	High	Moderate	Minor Adverse
Night and Winter	In the winter months this view is unlikely to change given the lack of trees present. The lighting at night would be a change to the existing, but out of context and with limited surrounding existing built form it is unlikely to form any additional harm.				

Viewpoint 10 is taken from the corner of Wolsey Road and the junction with Bridge Road looking along Creek Road towards the Railway Station building (the description of this position is questionable, the junction with Wolsey Road is located further back). This view is identified as an important view within the East Molesey Kent Town Conservation Area appraisal. The proposed development would be highly visible in this view and would be taller than the station building, finishing approximately 1 storey above (this storey is the roof of the development). The palette of materials in the proposed development has been designed to complement the station building and other buildings in the locality, however the materials blend into one which further lessens the importance of the Railway Station building in this view. The proposed dormer windows are also unfortunate as their scale is at odds with the station building below. This view can only be seen in a limited number of places due to the tunnelling effect of Creek Road, but nonetheless the scale, massing and design of the development dominates the Railway station building to its detriment.

Viewpoint No.	Receptor Value (VA)	Susceptibility to Change	Magnitude	Likely Effect	Beneficial or Harmful
10	Medium	Medium	Medium	Moderate	Moderate Adverse
Night and Winter	In the winter months this view will be unaltered due to the lack of trees. The additional lighting from the development whilst a clear increase is likely to get lost in the other lights that are already present within this view.				

Viewpoint 11 (included within an Addendum) is taken from outside of the Petrol Station on Hampton Court Way looking north with the existing Railway Station building clearly visible. The existing view highlights the open nature of the Railway Stations setting, but the vehicular parking that surrounds it has a negative impact. The proposed development will be very prominent in this view and will hide the existing train station. Whilst the negative parking will be removed, it is replaced with a four storey building, located hard up against the pavement edge. The sheer massing of the development and its unrelenting position against the pavement which is uncharacteristic of the area would be visually detrimental.

Viewpoint No.	Receptor Value (VA)	Susceptibility to Change	Magnitude	Likely Effect	Beneficial or Harmful
11	Low	High	High	Moderate/ Major	Moderate Adverse
Night and Winter	In the winter months this view will be unaltered due to the lack of trees. The additional lighting from the development will clearly impact this view, the lighting would further indicate the massing of the building and its proximity to the street.				

Overall the development has a harmful impact on all, but one (Viewpoint 8) of the identified views. This impact is worse in views where the development is seen against the existing townscape. As you move away from the development

and the wider setting of the existing townscape is reviled, the proposed scale, massing and design become contextually evident and it is then that they appear most at odds with the existing and established character. As highlighted in Viewpoint 8 there are benefits associated with the development, notably the improved public realm, removal of the existing hoardings and the additional vitality that would be created.

Heritage

The statutory duties with regards to heritage and listed buildings in particular are set out in The Planning (Listed Buildings and Conservation Areas) Act 1990. Section 66(1) states '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'.

The Act goes on to state under section 72(1) with regards to conservation areas 'In the exercise, with respect to any buildings or other land in a conservation area, of any (functions under or by virtue of) any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area'.

The Act sets out the presumption in favour of the preservation of listed buildings, their settings and conservation areas. Any harm to the significance of a designated heritage asset must be given considerable importance and weight. This is further reflected in the NPPF under paragraph 193 which states 'When considering the potential impacts of a proposed development on the significance of a designated heritage asset, great weight should be given to the assets 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'.

The NPPF also sets out how harm to designated heritage asset should be assessed. With regards to substantial harm it states under paragraph 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.

The NPPF goes on to state under paragraph 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.

With regards to harm that is deemed less than substantial, the NPPF states under paragraph 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'.

In relation to non-designated heritage assets, paragraph 197 of the NPPF provides that the effect of an application on such an asset should be taken into account in determining the application and that in weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Paragraphs 200 and 201 of the NPPF provide that "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" and "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".

The application site lies within the East Molesey Kent Town Conservation Area, contains a very small section of the Grade II Listed Hampton Court Bridge (both designated heritage assets) and the Locally Listed Hampton Court Station (a non-designated heritage asset). The site is adjacent to a number of other designated and non-designated heritage assets both within the Elmbridge Borough Council boundary and that of the Richmond Council. These include the internationally important Grade I listed Hampton Court Palace and Park. There are a number of heritage assets potentially affected by the application and these are outlined below. The table includes the assets that are highlighted within the Environmental Statement: Volume 3, table 4.1, as requiring assessment, plus those the significance of which the Council considers the

development has the potential to affect, especially those within the gardens of Hampton Court. These assets have been mentioned in consultation responses. The table also includes assets that are outside of the Elmbridge Borough Council boundary. The expanded table of heritage assets within the Environmental Statement includes those assets that are not considered to be affected and have not been assessed. The map reference relates to figure 4.9 of the same document. It is noted that map references 71, 72, 73 and 74 are incorrectly labelled.

Listed Buildings

Map Ref	Heritage Asset	Receptor Value (HR)	Susceptibility to Change	Magnitude	Likely Affect	Beneficial or Harmful
1	Fountain Garden - Gates	Exceptional	High	Negligible	Neutral/ Negligible	Negligible
Impact and Reasoning		The gates are located to the east of the Palace and separated from the development by the existing tree screen and changes in level. Their setting within the Palace gardens adds to their significance. The wider setting, that is outside of the gardens is of less importance. Therefore, whilst the development would be visible, the affect of it on the wider green setting is not considered detrimental to their significance.				
2	Hampton Court Tilt Yard Tower	Exceptional	Low	Negligible	Neutral/ Negligible	Neutral
Impact and Reasoning		The Tower's setting is formed by the buildings immediately around it and these add to its significance. The development is approx. 400m to the south and separated by other buildings. The development would not be visible and as such it is not considered to impact on the significance of this asset.				
3	Privy Garden – Screens and Walls	Exceptional	High	Negligible	Neutral/ Negligible	Negligible
Impact and Reasoning		The screens and walls are located to the south of the Palace and separated from the development by the existing tree screen and changes in level. Their setting within the gardens adds to their significance. The wider setting, that is outside of the gardens is of less importance. Therefore, whilst the development would be visible, the affect of it on the wider green setting is not considered detrimental to their significance.				
5	Trophy Gates	Exceptional	Low	Nil	None	Neutral
Impact and Reasoning		The gates mark the entrance to Hampton Court Palace and are of national importance in their own right as well as being associated with the Palace. Their significance is partially derived from the immediate setting, being part of the Palace boundary. Due to the changes in level, when at the gates there are no views of the development. Their setting is maintained and therefore the development is not considered harmful.				

6	Privy Garden - Sundial	Exceptional	High	Negligible	Neutral/ Negligible	Negligible
Impact and Reasoning		The sundial is located to the south of the Palace and separated from the development by the existing tree screen and changes in level. Its setting within the gardens adds to their significance. The wider setting, that is outside of the gardens is of less importance. Therefore, whilst the development would be visible, the affect of it on the wider green setting is not considered detrimental to its significance.				
7	Fountain Garden - Gates	Exceptional	Low	Nil	None	Neutral
Impact and Reasoning		The gates are located to the north east of the Palace and separated from the development by the existing tree screen, changes in level and the Palace itself. Their setting within the gardens adds to its significance. The wider setting, that is outside of the gardens is of less importance. The affect the development has on the wider green setting is not considered detrimental to their significance.				
8	Barracks	Exceptional	Medium	Medium	Moderate / Major	Moderate Adverse
Impact and Reasoning		The Barracks line the northern side of the entrance towards the Palace and face directly towards the development. The Barracks and the development cannot be seen in the same view, however views out of the Barracks themselves would be similar to Viewpoint 6. The setting of the Barracks adds to its significance through its relationship with the Palace and the surrounding grounds.				
9	Royal Mews and Great Barn	Exceptional	Low	Nil	None	Neutral
Impact and Reasoning		These buildings are separated from the development by intervening buildings, vegetation and the River Thames. The development would have no bearing on their significance or setting.				
10	Hampton Court Palace - also a Scheduled Ancient Monument	Exceptional	Medium	Medium	Moderate / Major	Moderate Adverse
Impact and Reasoning		The Palace considered here in its entirety is set along the banks of the River Thames which plays an important visual and historical role in the significance of the Palace itself. The edge of the application site provides a green buffer to the Palace, which helps to enhance and provide a semi-rural setting. The visual relationship has remained unaffected for a vast about if time. It is the Council's view that the setting of the Palace is harmed due to the scale, massing, design and proximity of the development, which will be visible from numerous locations within the Palace and its grounds. There are benefits to the				

		Palace in the form of the views created across the Thames when approaching from the south / railway station and the improvements to the public realm around the development, however these are insufficient to outweigh the harm identified to the setting of the Palace.				
11	Lower Orangery	Exceptional	High	Medium	Moderate / Major	Moderate Adverse
Impact and Reasoning		The Lower Orangery due to its orientation does not directly face the development, limiting views. However, the tree screen is insufficient to hide the development and the massing would impinge on the setting of the asset and the otherwise green landscape that it is currently experienced within.				
12	Tennis Court	Exceptional	Low	Nil	None	Neutral
Impact and Reasoning		This building housed real tennis which was played inside. It is a significant building within the Hampton Court Palace complex but is separated from the development and would remain unaffected.				
13	Banqueting House	Exceptional	High	Medium	Moderate / Major	Moderate Adverse
Impact and Reasoning		This building is generally experienced within the setting of the other buildings that make up the Palace. Nonetheless the tree screen is insufficient to hide the development and the massing would impinge on the setting of the asset and the otherwise green landscape that it is currently experienced within.				
14	Walls and Railings to Hampton Court Palace	Exceptional	High	Negligible	Neutral/ Negligible	Neutral
Impact and Reasoning		The walls and railings are associated with the Palace, forming part of and adding to its setting. Their significance is derived from this relationship. Whilst the development would be visible in relation to the walls and railings it is not considered to affect their significance.				
16	Fountain Garden – Statute in Front of Canal	Exceptional	Medium	Negligible	Neutral/ Negligible	Negligible
Impact and Reasoning		The statue is located to the east of the Palace and separated from the development by the existing tree screen and changes in level. Its setting within the gardens adds to their significance. The wider setting, that is outside of the gardens is of less importance. Therefore, whilst the development would be visible, the affect of it on the wider green setting is not considered detrimental to its significance.				
17	The Old Court House	High	Low	Nil	None	Neutral
Impact and Reasoning		This building is situated within a terrace of other listed buildings. Its location and history are related to the terrace. The separation, intervening townscape and level changes mean				

		that there are no views of the development and it would therefore have no impact.				
20	Hampton Court Bridge	Medium	High	High	Moderate /Major to Major	Moderate Adverse
Impact and Reasoning		<p>The Bridge draws significance from its setting and the connection that is formed between East Molesey and the Palace. The Palace and listed buildings that are opposite form the approach from the north and the development site and the buildings of Creek Road the approach from the south. The development site is currently neutral in its impact on the Bridges setting, it does not detract from the Bridge due to the scale and massing of the buildings that are currently on the site. The development harms the distant approach (adjacent to the petrol station, Viewpoint 11) from the south where your focus would be drawn to the development and away from the Bridge. However, the development improves the approach when closer (adjacent to the station building, similar to Viewpoint 8), where the significance of the Bridge is better revealed due to the new public realm improvements. Once on the Bridge, views back towards the development would harm the historical relationship of the Bridge to East Molesey which are worsened by the light that would be emitted at night. The proposed traffic management would also be visible in this view. The development would draw attention away from the Bridge, lessening its significance and harming its setting. The scale, massing and design of the development urbanises the approach from the south and would draw undue attention when approaching and crossing the bridge from the North. The benefits described above are considered to reduce the harm level to the Moderate conclusion.</p>				
22	Mitre Hotel	Medium	Medium	Low	Minor/ Moderate	Neutral / Negligible
Impact and Reasoning		<p>Set on the banks of the Thames the Hotel's significance is in part derived from its setting. This is generally formed by the Thames, Hampton Court Bridge and the Palace. Views of the development would be limited to the upper storeys due to the level changes or broken by Hampton Court Bridge and whilst an alteration to its setting, it is not deemed harmful.</p>				
23	Palace Gate	Medium	Medium	Low	Minor/ Moderate	Neutral / Negligible
Impact and Reasoning		<p>This building is situated within a terrace of other listed buildings. Its significance is partially in its relationship with the other buildings within the terrace and its immediate setting. It is positioned opposite the Palace where views of the development may be possible but are likely to be limited due to the level changes, resulting in only views of the upper storeys. The separation and nature of the available views, plus that its immediate setting is maintained means the development would have no impact.</p>				
24	Sunken Garden - Statue	Medium	High	Negligible	Neutral/ Negligible	Negligible

Impact and Reasoning		The statue is located to the south of the Palace and separated from the development by the existing tree screen and changes in level. Its setting within the gardens adds to their significance. The wider setting, that is outside of the gardens is of less importance. Therefore, whilst the development would be visible, the affect of it on the wider green setting is not considered detrimental to its significance.				
25	Statue in Fountain Garden on Lawn Opposite Tennis Courts	Medium	Low	Nil	None	Neutral
Impact and Reasoning		The statue is located to the east of the Palace and separated from the development by the existing tree screen, changes in level and the Palace itself. Its setting within the gardens adds to its significance. The wider setting, that is outside of the gardens is of less importance. The affect the development has on the wider green setting is not considered detrimental to its significance.				
26	Privy Garden - Statue	Medium	High	Negligible	Neutral/ Negligible	Negligible
Impact and Reasoning		The statue is located to the south of the Palace and separated from the development by the existing tree screen and changes in level. Its setting within the gardens adds to their significance. The wider setting, that is outside of the gardens is of less importance. Therefore, whilst the development would be visible, the affect of it on the wider green setting is not considered detrimental to its significance.				
27	Privy Garden - Statue	Medium	High	Negligible	Neutral/ Negligible	Negligible
Impact and Reasoning		The statue is located to the south of the Palace and separated from the development by the existing tree screen and changes in level. Its setting within the gardens adds to their significance. The wider setting, that is outside of the gardens is of less importance. Therefore, whilst the development would be visible, the affect of it on the wider green setting is not considered detrimental to its significance.				
28	Privy Garden - Statute	Medium	High	Negligible	Neutral/ Negligible	Negligible
Impact and Reasoning		The statue is located to the south of the Palace and separated from the development by the existing tree screen and changes in level. Its setting within the gardens adds to their significance. The wider setting, that is outside of the gardens is of less importance. Therefore, whilst the development would be visible, the affect of it on the wider green setting is not considered detrimental to its significance.				
29	Privy Garden –	Medium	High	Negligible	Neutral/ Negligible	Negligible

	10 Lead Vases					
Impact and Reasoning		The vases are located to the south of the Palace and separated from the development by the existing tree screen and changes in level. Their setting within the gardens adds to their significance. The wider setting, that is outside of the gardens is of less importance. Therefore, whilst the development would be visible, the affect of it on the wider green setting is not considered detrimental to their significance.				
30	Fountain Garden - Urn	Medium	Low	Nil	None	Neutral
Impact and Reasoning		The urn is located to the east of the Palace and separated from the development by the existing tree screen, changes in level and the Palace itself. Its setting within the gardens adds to its significance. The wider setting, that is outside of the gardens is of less importance. The affect the development has on the wider green setting is not considered detrimental to its significance.				
31	Fountain Garden – Pair of Urns	Medium	Low	Nil	None	Neutral
Impact and Reasoning		The urns are located to the east of the Palace and separated from the development by the existing tree screen, changes in level and the Palace itself. Their setting within the gardens adds to its significance. The wider setting, that is outside of the gardens is of less importance. The affect the development has on the wider green setting is not considered detrimental to their significance.				
32	Palace Gate House	Medium	Low	Negligible	Neutral/ Negligible	Negligible
Impact and Reasoning		The Gate House is located on the corner of the terrace opposite the Palace. Its significance is partially drawn from its immediate surroundings. The separation, intervening townscape and level changes mean that there would at best be limited views of the upper storeys of the development. The impact is therefore considered to be negligible.				
33	The Green	Medium	Low	Nil	None	Neutral
Impact and Reasoning		This building is situated within a terrace of other listed buildings. Its location and history are related to the terrace. The separation, intervening townscape and level changes mean that there are no views of the development and therefore there would be no impact.				
34	Court Cottage	Medium	Low	Nil	None	Neutral
Impact and Reasoning		This building is situated within a terrace of other listed buildings. Its location and history are related to the terrace. The separation, intervening townscape and level changes mean that there are no views of the development and therefore there would be no impact.				
35	Faraday House and	Medium	Low	Nil	None	Neutral

	Cardinal House with Wall and Gate piers to Street					
Impact and Reasoning		This building is situated within a terrace of other listed buildings. Its location and history are related to the terrace. The separation, intervening townscape and level changes mean that there are no views of the development and therefore there would be no impact.				
39	Kingfisher Court	Medium	Low	Negligible	Neutral/ Negligible	Neutral
Impact and Reasoning		This building and its associated buildings are located over 300m from the development. It is inward looking and therefore takes little significance from its setting. Views of the development will be long distance east along Bridge Road. It is very unlikely that Kingfisher Court and the development will be seen together due to the intervening townscape.				
40	Kingfisher Court	Medium	Low	Negligible	Neutral/ Negligible	Neutral
Impact and Reasoning		This building and its associated buildings are located over 300m from the development. It is inward looking and therefore takes little significance from its setting. Views of the development will be long distance east along Bridge Road. It is very unlikely that Kingfisher Court and the development will be seen together due to the intervening townscape.				
41	Swimming Pool and associated Pump House at Kingfisher Court and Fountain at Kingfisher Court	Medium	Low	Nil	None	Neutral
Impact and Reasoning		This building/ pool is associated with Kingfisher Court and located over 300m from the development. The site is inward looking and draws significance from its setting in the form of the relationship with the main block.				
42	Pond, Retaining Walls enclosing Sunken Garden, Piers around former Pergola at Kingfisher Court	Medium	Low	Nil	None	Neutral

Impact and Reasoning		This structure is associated with Kingfisher Court and located over 300m from the development. The site is inward looking and draws significance from its setting in the form of the relationship with the main block.				
46	Privy Garden - Statue	Medium	High	Negligible	Neutral/ Negligible	Negligible
Impact and Reasoning		The statue is located to the south of the Palace and separated from the development by the tree screen and changes in level. Its setting within the gardens adds to their significance. The wider setting, that is outside of the gardens is of less importance. Therefore, whilst the development would be visible, the affect of it on the wider green setting is not considered detrimental to its significance.				
47	Fountain Garden - Vase	Medium	Medium	Negligible	Neutral/ Negligible	Negligible
Impact and Reasoning		The vase is located to the east of the Palace and separated from the development by the tree screen and changes in level. Its setting within the gardens adds to their significance. The wider setting, that is outside of the gardens is of less importance. Therefore, whilst the development would be visible, the affect of it on the wider green setting is not considered detrimental to its significance.				
48	Fountain Garden – Pair of Pedestals	Medium	Medium	Negligible	Neutral/ Negligible	Negligible
Impact and Reasoning		The pedestals are located to the east of the Palace and separated from the development by the tree screen and changes in level. Their setting within the gardens adds to their significance. The wider setting, that is outside of the gardens is of less importance. Therefore, whilst the development would be visible, the affect of it on the wider green setting is not considered detrimental to their significance.				
49	Statue in Fountain Garden	Medium	High	Negligible	Neutral / Negligible	Negligible
Impact and Reasoning		The urns are located to the east of the Palace and separated from the development by the tree screen and changes in level. The urns setting within the gardens adds to their significance. The wider setting, that is outside of the gardens is of less importance. Therefore, whilst the development would be visible, the affect of it on the wider green setting is not considered detrimental to their significance.				
50	Palace Gate	Medium	Medium	Low	Minor/ Moderate	Neutral/ Negligible
Impact and Reasoning		This building is situated within a terrace of other listed buildings opposite the Palace. Its significance is partially in its relationship with the other buildings within the terrace and its immediate setting. Views of the development may be possible but are likely to be limited due to the level changes, resulting in only views of the upper storeys. The separation and nature of				

		the available views, plus that its immediate setting is maintained means the development would have no impact.				
55	Faraday Cottage, King's Store Cottage, attached garage between King's Store Cottage and Old Court House	Medium	Medium	Negligible	Neutral / Negligible	Negligible
Impact and Reasoning		Set back from the banks of the Thames these buildings derive significance from their immediate setting formed of the small cluster of buildings around them, which are unaffected by the development. Views of the development would be limited at best to the upper storeys due to the level changes or broken by Hampton Court Bridge and other intervening townscape and/ or trees. Whilst the development would be an alteration to their setting and most visible from where the plot meets the Thames, it is not deemed harmful.				
56	Old Office House	Medium	Medium	Negligible	Neutral / Negligible	Negligible
Impact and Reasoning		Set back from the banks of the Thames these buildings derive significance from their immediate setting formed of the small cluster of buildings around them, which are unaffected by the development. Views of the development would be limited at best to the upper storeys due to the level changes or broken by Hampton Court Bridge and other intervening townscape and/ or trees. Whilst the development would be an alteration to their setting and most visible from where the plot meets the Thames, it is not deemed harmful.				
59	Fountain Garden – Pair of Pedestals	Medium	High	Negligible	Neutral/ Negligible	Negligible
Impact and Reasoning		The pedestals are located to the south east of the Palace and separated from the development by the existing tree screen and changes in level. Their setting within the gardens adds to their significance. The wider setting, that is outside of the gardens is of less importance. Therefore, whilst the development would be visible, the affect of it on the wider green setting is not considered detrimental to their significance.				
60	Paper House	Medium	Low	Nil	None	Neutral
Impact and Reasoning		This building is situated within a terrace of other listed buildings. Its location and history are related to the terrace. The separation, intervening townscape and level changes mean that there are no views of the development and therefore there would be no impact.				

61	Fountain Garden – Pair of Urns	Medium	Medium	Negligible	Neutral/ Negligible	Negligible
Impact and Reasoning		The urns are located to the east of the Palace and separated from the development by the existing tree screen and changes in level. Their setting within the gardens adds to their significance. The wider setting, that is outside of the gardens is of less importance. Therefore, whilst the development would be visible, the affect of it on the wider green setting is not considered detrimental to their significance.				
62	Fountain Garden – Pair of Urns	Medium	Medium	Negligible	Neutral/ Negligible	Negligible
Impact and Reasoning		The urns are located to the east of the Palace and separated from the development by the existing tree screen and changes in level. Their setting within the gardens adds to their significance. The wider setting, that is outside of the gardens is of less importance. Therefore, whilst the development would be visible, the affect of it on the wider green setting is not considered detrimental to their significance.				
63	Sunken Garden - Statue	Medium	High	Negligible	Neutral/ Negligible	Negligible
Impact and Reasoning		The statue is located to the south of the Palace and separated from the development by the existing tree screen and changes in level. Its setting within the gardens adds to their significance. The wider setting, that is outside of the gardens is of less importance. Therefore, whilst the development would be visible, the affect of it on the wider green setting is not considered detrimental to its significance.				
64	Privy Garden - Statute	Medium	High	Negligible	Neutral/ Negligible	Negligible
Impact and Reasoning		The statue is located to the south of the Palace and separated from the development by the existing tree screen and changes in level. Its setting within the gardens adds to their significance. The wider setting, that is outside of the gardens is of less importance. Therefore, whilst the development would be visible, the affect of it on the wider green setting is not considered detrimental to its significance.				
65 - 64 in table	Super-intendents House, The Georgian House	Medium	Low	Nil	None	Neutral
Impact and Reasoning		Located in the heart of the Palace complex its significance is partially drawn from its setting within the Palace. The development will not be visible from this location and as such it considered to be unaffected.				

66	Hampton Court Bridge	n/a	n/a	n/a	n/a	n/a
Impact and Reasoning		This is a duplicate record and was removed from the list by Historic England on 7 th February 2019.				
68	Bridge over the River Ember	Medium	Medium	Low	Minor/ Moderate	Neutral
Impact and Reasoning		This Bridge draws significance from its setting but to a much lesser extent than Hampton Court Bridge. When crossing over the Bridge it is not entirely evident that you are on a bridge. The Bridge has been urbanised and includes a footpath and grass verge that match the highway treatments before and after it. The massing of the development would be evident to the north, however the significance drawn from its setting has a very limited boundary, ultimately only consisting of the immediate road surface to the north and south and the water over which it bridges. Whilst the development would be visible from the bridge, its setting is considered to be unaffected and as such there is no impact.				
69	K6 Telephone Kiosk at Hampton Court Trophy Gates	Medium	Low	Nil	None	Neutral
Impact and Reasoning		The Telephone kiosk is one of a limited number of K6 designs that remain. Whilst the kiosk is important in our developmental history, these kiosks can be found in many locations, their setting does not add to their significance.				
70	War Memorial to the Men of East and West Molesey	Medium	Medium	Negligible	Neutral Negligible	Neutral
Impact and Reasoning		The memorial is an important feature within the Conservation Area, however it does not draw any significance from its setting.				

Conservation Areas

<i>Map Ref</i>	<i>Heritage Asset</i>	<i>Receptor Value (HR)</i>	<i>Susceptibility to Change</i>	<i>Magnitude</i>	<i>Likely Affect</i>	<i>Beneficial or Harmful</i>
B	Hampton Court Park	High	High	Medium	Moderate/ Major	Moderate Adverse
Reasoning and Impact		The setting of the Conservation Area will be affected to the south west where the development is located. The scale of this impact is dependent on your location with the Palace, its grounds or the towpath. The development impinges on the openness of the Conservation Area's setting and in accordance with other				

		assessments of the setting of Hampton Court Palace the development would have an adverse impact.				
D	Hampton Court Green	Medium	Low	Negligible	Neutral/ Negligible	Neutral/ Negligible
Reasoning and Impact		This area includes the buildings on the north side of the Thames to the west of Hampton Court Palace, plus the green space to its north. Views out over Hampton Court Bridge are limited from within the Conservation Area due to the increase in levels over the Bridge. Given that views are limited and that the conservation areas setting on the south side of the river is one of largely built townscape, the character and appearance of the conservation area is considered unaffected.				
E	East Molesey – Kent Town	Medium	High	Medium	Moderate to Moderate Major	Minor Adverse
Reasoning and Impact		The works are located in a part of the Conservation Area which has a different character to the remaining residential streets. The scale, massing, siting and design of the development are considered harmful due to the impact on views north and south along Hampton Court Way, the view east along Bridge Road, the impact on the Railway Station building, the impact on Cigarette Island and the Air Raid shelter. There are benefits to the development in heritage terms in the form of the removal of the existing hoarding and the increase in vitality, plus the improvements to the views across the water of Hampton Court and Hampton Court Bridge. All in all these benefits are considered to lessen the impact of the development, but that it is still harmful.				

Registered Parks and Gardens

<i>Map Ref</i>	<i>Heritage Asset</i>	<i>Receptor Value (HR)</i>	<i>Susceptibility to Change</i>	<i>Magnitude</i>	<i>Likely Affect</i>	<i>Beneficial or Harmful</i>
95	Hampton Court	Exceptional	Medium	Medium	Moderate/ Major	Moderate Adverse
Reasoning and Impact		The setting of the Park will be affected to the south west where the development is located. The magnitude of this impact is dependent on your location and will alter from various positions within the Park. The setting of the park is important to its significance and to the west where the development is located Cigarette Island and the existing trees provide a green buffer that enhances views out of the park.				

Locally Listed Buildings/Areas (*this list does not include buildings within Richmond*)

<i>Map Ref</i>	<i>Heritage Asset</i>	<i>Receptor Value (HR)</i>	<i>Susceptibility to Change</i>	<i>Magnitude</i>	<i>Likely Affect</i>	<i>Beneficial or Harmful</i>
n/a	Hampton Court	Very Low	High	High	Moderate to	Moderate Adverse

	Train Station				Moderate/ Major	
Reasoning and Impact	The train station lies at the centre of the application site. Its setting is one of an open railway complex and this contributes to its significance. The development would engulf the building in both plan and elevation. Its setting would be harmed which would in turn affect its significance.					
n/a	5-7 Creek Road	Very Low	High	Medium	Minor Moderate to Moderate	Neutral/ Negligible
Reasoning and Impact	The significance of this building lies within the terrace of buildings within which it is located. The development would be clearly visible however due to the separation and that fact that the building's immediate setting is retained, the buildings significance is considered to be maintained.					
n/a	Albion Public House, 34-36 Bridge Road	Very Low	Low	Negligible	Neutral/ Negligible	Neutral
Reasoning and Impact	Located on Bridge Road and within a tight collection of buildings the development lies 120m to its east. The setting of this building is important with regards to the relationship with Bridge Road. The rear part of its setting adds no significance. Given the development lies to the rear of the site its significance is considered to be maintained.					
n/a	The Old Mill, Queen's Reach	Very Low	Low	Nil	None	Neutral
Reasoning and Impact	Located within the Queen's Reach development the significance of this building relies little on its setting which has been vastly altered following the construction of the residential development around it. It is also separated from the development by buildings and Hampton Court Way. Its significance is maintained.					
n/a	The Limes, 5 Palace Road	Very Low	Low	Nil	None	Neutral
Reasoning and Impact	Located on Palace Road this building is separated from the development by the buildings along Bridge Road and Creek Road its setting and significance are maintained.					
n/a	70 (The Post Office) and 72 (Bridge House) Bridge Road	Very Low	Low	Nil	None	Neutral
Reasoning and Impact	Located on Bridge Road views of this building from the junction with Wolsey Road would include the development framed at the					

		end of Creek Road (viewpoint 10). Whilst visible, given the distances involved and the fact that the significance of these buildings is limited to their immediate surroundings means that their significance is considered to be maintained.				
n/a	Cigarette Island	Very Low	Medium	High	Moderate	Neutral/ Negligible
Reasoning and Impact		Located to the north east of the application site, this green space, whilst not officially recognised on the Council's local list register is considered to be of importance. The development would alter its setting, however the primary relationship with the Thames and trees would be maintained. Plus the development would improve the usability of the green space and therefore whilst the development will affect this area it is not considered to be harmful.				
n/a	Air Raid Shelter	Very Low	Medium	High	Minor/ Moderate	Minor Adverse
Reasoning and Impact		The existing air raid shelter, whilst not officially recognised on the Council's local list register would be affected through the proposed access road and temporary carpark covered under a separate application. SCC Archaeology has confirmed that they are content with the proposals and that a suitable condition would preserve the asset. As such the significance and setting of the shelter are considered to be maintained.				

The submitted Environmental Statement states that the application site does not contain any heritage assets, although there are heritage assets in the wider area. As highlighted above there are heritage assets within the application site under the definition provided within the glossary of the NPPF which for clarity states 'A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)'.

In the Executive Summary the document also states that the impact on 'setting' itself is not a consideration. Whilst this is true, an adverse impact on the setting of an asset could harm its significance, which is under consideration. Where the setting of an asset does not add to its significance, an adverse impact on its setting would not be harmful.

Summary of impact on Hampton Court Palace

Hampton Court Palace is considered to be of national and international significance. The analysis/ assessments above set out the impact of the proposals on the various elements that make up the Palace and its grounds. The setting of the Palace as described earlier is mostly made up of landscape to the north, east and large parts of the south. To the west the River Thames plays an important part in its history with the townscape of East Molesey acting as a backdrop beyond. These elements add to the significance of the Palace. Officers do not consider that the existing application site has a negative effect on the setting of the Palace (the hoardings are of limited scale and visibility and at worst have a neutral impact). The development will impact on the setting of the Palace through the increased scale and massing. This scale and massing

has been confirmed in the viewpoints and that it would be visible from the Palace and its grounds. The increase in massing has the effect of bringing the townscape on the south of the river closer to the Palace. It is the increased prominence of the massing that draws attention and lessens the positive impact the trees and existing green setting that is created by Cigarette Island and Ditton Field have on the Palace's setting. Furthermore, the additional light created from the development at night will impact the ambiance within the Palace grounds and continue to highlight the scale and massing of the development at night. The location of the development opposite the Barracks and the open space of the Palace approach/ entrance further harms the Palace's setting, which is only partially shielded by the existing tree line.

Officers considers the impact to Hampton Court Palace and its Gardens to be classed under the NPPF as 'less than substantial' harm. However, the international importance of the Palace and its gardens means that the overall impact has considerable weight in the planning balance.

Summary of impact on Character Areas

The assessment above considers the impact of the development on a number of Character Areas. These assessments are summarised in the table below.

Character Area 1	Moderate Adverse
Character Area 2	Moderate Adverse
Character Area 4	Minor Adverse
Character Area 6	Minor Adverse

The analysis of the impact on the Character Areas has concluded that all of the areas that are closest to the development would be adversely affected, barring Character Area 5, where the benefits have outweighed the harm. These assessments have concluded that the Townscape of the locality would be harmed if the proposed development were erected.

Summary of impact on Viewpoints

The assessment above considers the impact of the development on a number of viewpoints. These assessments are summarised in the table below.

Viewpoint 1	Minor Adverse
Viewpoint 2	Minor Adverse
Viewpoint 3	Minor Adverse
Viewpoint 4	Moderate Adverse
Viewpoint 5	Moderate Adverse
Viewpoint 6	Moderate Adverse
Viewpoint 7	Major Adverse
Viewpoint 9	Minor Adverse
Viewpoint 10	Moderate Adverse
Viewpoint 11	Moderate Adverse

The analysis of the impact on the identified viewpoints has concluded that harm would be created in all but one (Viewpoint 8). Overall it is the siting, scale,

massing and design of the proposals that have been found to be incompatible with the existing townscape and the heritage assets that it possesses.

Summary of impact on listed buildings

The assessment above considers the impact of the development on the significance of surrounding listed buildings, which are a mixture of buildings, statues, bridges and other structures. These assessments are summarised in the table below.

8	Barracks	Grade I	Moderate Adverse
10	Hampton Court Palace	Grade I and Scheduled Ancient Monument	Moderate Adverse
11	Lower Orangery	Grade I	Moderate Adverse
13	Banqueting House	Grade I	Moderate Adverse
20	Hampton Court Bridge	Grade II	Moderate Adverse

The harm identified predominately is caused to Grade I listed buildings. These buildings such as Hampton Court Palace are of international importance. Harm was also found to Hampton Court Bridge which is a Grade II listed building. The harm identified when afforded 'great weight' weighs heavily against the development in the planning balance. The heritage benefits created by the development have also been considered and weighed when coming to the degree of harm identified. It is clear following this assessment that there are insufficient benefits to outweigh the harm.

The Council considers the impact to all listed buildings to be classed under paragraph 196 of the NPPF as 'less than substantial'.

Summary of impact on Conservation areas

The site is situated within the designated East Molesey Kent Town Conservation Area and forms part of the north-eastern corner of the Conservation Area. The character and appearance of the Conservation Area would be harmed through the massing and siting of the proposed development. The development in effect forms a new character to the eastern section of the Kent Town Conservation Area. The setting of the station building, especially when viewed in viewpoint 10 is also harmed. However, it is acknowledged that the development would enhance the sense of place around the locality, including the provision of new public realm and the resolution of a number of the negative features identified within the Conservation Area appraisal.

The Hampton Court Conservation Area includes Hampton Court Palace. The development site lies on the far western boundary of the area, but outside of its boundary. Whilst, in the context of the overall Conservation Area the development represents a small area of the conservation areas setting, it would adversely impact on the setting and significance of Hampton Court Palace.

The setting of the Hampton Court Green Conservation Area is the least affected, given that the development can only be seen from the brow of Hampton Court Bridge. The significance of the area is in part derived from its setting and its association with Hampton Court Palace. There are few views out over Hampton Court Bridge from within the Conservation Area due to the increase in levels over the Bridge.

Below is a table summarising the impact on each of the conservation areas.

Hampton Court Palace	Moderate Adverse
Hampton Court Green	Neutral/ Negligible
East Molesey Kent Town	Minor Adverse

The affect is worse on the Hampton Court Palace conservation are, due to the impact of the massing would have on the setting of the palace. Hampton Court Green is unaffected due to the separation and lack of visibility tween its boundaries and the development. And finally, Kent Town would see on balance some benefits to its character and appearance.

Summary of impact on Registered Parks and Gardens

There is only one Register Park and Garden within the context of the development. The assessment above has found that there would be harm to its setting.

Hampton Court – Park and Gardens	Moderate Adverse
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Summary of impact on Locally listed buildings

The assessment above considers the impact of the development on a number of Locally Listed Buildings. These assessments are summarised in the table below.

Railway Station Building	Moderate Adverse
Air Raid Shelter (not formally added to the local list)	Minor Adverse

The Railway Station Building, a locally listed building and sits at the heart of the development, it is also an important focal point within the conservation area. Of the locally listed buildings identified this is the one that is the most affected. At 1.5 storeys in height the building has greater presence than its scale would suggest.

An application was considered by Historic England to list Hampton Court Railway Station. This application was rejected on 1st April 2019 for the following principal reasons, which are taken from Historic England's decision:

Architectural Interest - compared to other surviving stations in a similar idiom by Sir William Tite, such as, Barnes, Windsor and Eton Riverside and Carlisle, Hampton Court Station compares poorly. Architecturally it is a somewhat

uninspired exercise in the Jacobethan historicist style and lacks the sense of movement and quality of detailing that would evoke a complimentary visual relationship with Hampton Court Palace; It has been significantly altered. The loss of the chimneys and finials means that the dynamic between the vertical and horizontal has been radically altered. The insertion of shop fronts has degraded the character of the main frontage and there have been significant later additions.

Historic Interest - although of some historical interest for its relationship to Hampton Court Palace, as, probably, the first railway station dedicated to facilitating sightseeing to a specific historical and cultural building and for its association with important early figures in the railway industry, this is not of sufficient interest to outweigh the lack of architectural interest.

Group Value - sited on the opposite bank of the Thames from Hampton Court Palace and with a visual relationship impaired by intervening planting, group value, despite a degree of historical functionality with the Palace, is not sufficiently evident.

The station building is in poor condition and officers have raised their concerns with Network Rail on previous occasions. The Environmental Statement: volume 3, states under paragraph 6.36 that "*Network Rail proposes to refurbish the station, and whilst these works do not form part of the planning application and are not weighed in the overall planning balance, they have the potential to further improve the character and appearance of this non-designated heritage asset.*" Officers agree that if works to renovate and improve the building were included within the application they would have been considered a benefit, but they are not.

The proposed development would represent a significant increase in the mass of the buildings surrounding the Railway Station building. This increase is considered to harm the setting of the building and the understanding of its origins as a building set within a railway complex. Whilst the buildings around it that are to be lost are of little interest they form its setting, allowing it to stand out and they are appropriate to the railway use of the site.

The Air Raid Shelter was identified during the application process and had otherwise been known. The shelter is not on the Council's local list, but an assessment by Surrey Archaeology has determined that it is of interest and hence why it has been added.

Archaeology

With regards to below ground Heritage Assets, a pre-commencement condition relating to archaeological investigation work has been recommended Surrey County Council. At this stage the development has not be found to cause harm to existing archaeology.

Heritage Benefits

Following the assessments above, heritage benefits have been noted in the table below. The benefits have been considered in the assessments of each of the assets affected and therefore do not add further to the planning balance, they are recorded here for clarity.

Hampton Court Palace – Grade I	Approach from the train station improved through the removal of the existing hoarding and the opening up of view over the Thames, (benefits form part of Viewpoint 8)
Hampton Court Bridge – Grade II	Improved views when approaching from Hampton Court Way
Kent Town conservation area	Improved vitality and public realm, plus the views identified above.

Need for Listed Building Consent

Specific objection has been raised to the inclusion of traffic lights at the southern end of Hampton Court Bridge. It has also been raised that these traffic signals require Listed Building Consent. The impact of the traffic signals on the setting of the bridge has been considered in the assessments above. Whilst it is for the LPA to make the final decision as to whether Listed Building Consent is required for the traffic signals, discussions have taken place with Historic England who have confirmed previously that consent is not required. Regardless of this point even if LBC were required for any of the works on the site this would not prevent the determination of this planning application. A further assessment of the need for LBC will be made as and when new information is available.

It is acknowledged and confirmed by the applicants that the proposed development would not result in works directly to the structure of Hampton Court Bridge. However, there is concern regarding the proposed construction works, particularly the sheet piling operations. The vibration assessment in the Environmental Statement: chapter 10 is noted, paragraph 10.53 recommends monitoring of vibration levels. Should permission be granted this would be secured by a condition(s) to address these concerns.

Heritage Conclusion

The above assessments have identified harm to a number of heritage assets of varying value. The table below sets out the heritage assets, viewpoints and character areas (as defined by the application) that are adversely affected.

<i>Asset, Character Area or Viewpoint</i>	<i>Receptor</i>	<i>Impact</i>
Character Areas	1	Minor Adverse
	2	Moderate Adverse
	4	Minor Adverse
	6	Minor Adverse
Viewpoints	Viewpoint 1	Minor Adverse
	Viewpoint 2	Minor Adverse
	Viewpoint 3	Minor Adverse
	Viewpoint 4	Moderate Adverse

	Viewpoint 5	Moderate Adverse
	Viewpoint 6	Moderate Adverse
	Viewpoint 7	Major Adverse
	Viewpoint 9	Minor Adverse
	Viewpoint 10	Moderate Adverse
	Viewpoint 11	Moderate Adverse
Listed Buildings	Barracks	Moderate Adverse
	Hampton Court Palace	Moderate Adverse
	Lower Orangery	Moderate Adverse
	Banqueting House	Moderate Adverse
	Hampton Court Bridge	Moderate Adverse
Conservation Areas	Hampton Court Palace	Moderate Adverse
	Hampton Court Green	Neutral/ Negligible
	East Molesey Kent Town	Minor Adverse
Registered Parks and Gardens	Hampton Court – Park and Gardens	Moderate Adverse
Locally Listed Building	Railway Station Building	Moderate Adverse
	Air Raid Shelter	Minor Adverse

The harm has all been categorised as 'less than substantial' (NPPF, paragraph 196), except in the case of the Locally Listed buildings as harm in their case is considered as a balanced judgement (NPPF, paragraph 197). 'Great weight' (Paragraph 193, NPPF) must be attributed to the conservation of heritage assets and therefore the balance weighs heavily in their favour.

In order for the works to be considered favourably substantial public and/ or heritage benefits must be provided that outweigh the harm and the requirement to preserve. The above summary table must also be carefully analysed as there are a number of overlaps between, character areas, viewpoints, conservations and buildings (both statutorily listed and locally listed).

In this case the development provides limited heritage benefits. Whilst there are some advantages, these benefits are not considered to outweigh the large number of heritage assets that would be harmed and the magnitude of that harm.