



A National Amenity Society

The Planning Inspectorate
Submitted online

14 February 2023

25 Ham Farm Road, Ham, Richmond, TW10 5NA. Appeal Ref. APP/L5810/W/22/3311969

Thank you for consulting the Council for British Archaeology (CBA) on this appeal against the refusal of application 22/0934/FUL.

Summary

The Council for British Archaeology previously objected to the Full application 22/0934/FUL, for the “Demolition of existing dwelling house and construction of replacement single storey dwellinghouse and associated hard and soft landscaping”, on the following grounds:

- the proposals would cause harm to the Parkleys Conservation Area.
- the dwelling at 25 Ham Farm Road is of evidential, historic and architectural value and should be considered as a Non-Designated Heritage Asset.

Although the applicant has provided a revised Heritage Statement to support this appeal against the refusal of the above proposal, we do not consider that it sufficiently addresses these issues. We therefore recommend that this appeal is **dismissed**.

Significance

25 Ham Farm Road is a single-storey dwelling dating from the 1950s, designed by noted architect Eric Lyons and constructed as part of the development of the wider Parkleys area. It is rare as a surviving example of a domestic property constructed by Lyons.

Unlike many conservation areas which are focused on older townscapes, the Parkleys Conservation Area recognises the architectural significance of the post-war development of the Estate, which the Conservation Area Appraisal describes as ‘a highly influential 1950s planned development of both flats on Parkleys and associated detached houses along Ham Farm Road’. As a remarkably well-preserved survivor of the development, 25 Ham Farm Road exemplifies the qualities for which the Conservation Area was designated and makes a positive contribution to the character and appearance of the Conservation Area.



25 Ham Farm Road has recently been designated as a Building of Townscape Merit, recognising 'its significance to the history and character of the local environment' (Richmond Local List webpage).

Comments

Impact on the Conservation Area

Application 22/0934/FUL, for the "Demolition of existing dwelling house and construction of replacement single storey dwellinghouse and associated hard and soft landscaping", included the design/heritage impact of the proposal among other reasons for refusal. The Decision Notice stated that:

'The proposed demolition of the existing dwelling, by reason of its contribution to the overall significance, character and appearance of the Conservation Area, would be detrimental to the setting of the cohesive group of buildings, the nearby non-designated heritage assets and the Conservation Area as a whole. As such the scheme fails to address the aims and objectives of the NPPF and, in particular, policy LP1, LP3 and LP4 of the Local Plan (2018), policies C2 and H2 of the Ham and Petersham Neighbourhood Plan, as supported by the Parkleys Estate Conservation Area Statement / Study.'

The revised Heritage Statement provided by HCUK seeks to rebut this by arguing that the proposed dwelling is of a high standard, which sufficiently mitigates the negative impact of the proposed demolition of Ham Farm Road on the Parkleys Conservation Area. The CBA strongly disagree with this assessment; while a well-designed new dwelling might not have a negative impact on the *appearance* of the Conservation Area, the contribution which the current building makes to the *character*, significance and legible history of the area cannot be replicated. A modern building cannot have the same evidential, historical and architectural values as a rare and well-preserved surviving example of an 1950s dwelling by a noted architect of the time, which formed part of a significant large-scale development. The demolition of 25 Ham Farm Road would therefore certainly cause harm to the Parkleys Conservation Area.

Relevant here is para. 72(1) of the 1990 Planning (Listed Buildings and Conservation Areas) Act, which requires that in a Conservation Area 'special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area'. The National Planning Policy Framework (NPPF) para. 199 also requires that 'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation.'

Impact on the Building of Townscape Merit



The CBA strongly disagree with the revised Heritage Statement's assessment that the 'limited heritage value of the subject building is not considered to weigh significantly in favour of its retention'. We concur with the Twentieth Century Society's comments, that the quotations included from Historic England's 2021 report give the misleading impression that the building is of 'low heritage value'. In fact, the report notes that the building has 'clear claims to architectural and historic interest', in particular in its largely intact survival and its design by Lyons. Its recent inclusion on Richmond's Local List as a Building of Townscape Merit underlines its heritage value.

The proposal would result in the total loss of a Building of Townscape Merit. This would classify as **substantial harm** to a Non-Designated Heritage Asset. Harm to the significance of Non-Designated Heritage Assets should be taken into account in determining the application, under NPPF para. 203. Replacing 25 Ham Farm Road with another private dwelling means there are minimal public benefits that would be derived from the demolition of this building to consider in the planning balance. In addition, Richmond's Local Plan Richmond's Local Plan states that 'There will be a presumption against the demolition of Buildings of Townscape Merit' (Policy LP4).

Recommendation

The CBA do not consider that the additional documents provided for the appeal sufficiently refute the reason for the refusal of application 22/0934/FUL on design/heritage grounds. We consider that the demolition of 25 Ham Farm Road would cause harm to the Parkleys Road Conservation Area and substantial harm to the existing Building of Townscape Merit. We do not consider that this harm to the historic character of the building and the area can be outweighed by the design of its proposed replacement. We therefore recommend that this appeal is **dismissed**.

I trust these comments are useful to you; please keep the CBA informed of any developments with this case.

Kind Regards,

Dr Alison Edwards, PhD, ACIfA
Assistant Listed Buildings Caseworker

The Council for British Archaeology (CBA) is the national amenity society concerned with protection of the archaeological interest in heritage assets. Local planning authorities have a duty to notify the CBA of applications for listed building consent involving partial or total demolition, under the procedures set out in, **Arrangements for handling heritage applications – notification To Historic England and National Amenity Societies and the Secretary of state (England) direction 2021**.