

HAMPTON COURT RESCUE CAMPAIGN



**DEDICATED TO RESTORING, PRESERVING AND SAFEGUARDING
THE FUTURE OF THE HAMPTON COURT SITE**

To: Martin Parker Esq., MRTPI
Head of Town Planning,
Elmbridge Borough Council
Civic Centre,
High Street,
Esher,
Surrey. KT10 9SD

APPLICATION: 2008/1600 (FULL APPLICATION)

Town & Country Planning Act 1990

THE HAMPTON COURT RESCUE CAMPAIGN

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8 August, 2008

Mr. Martin Parker BA. MRTPI.,
Head of Town Planning,
Elmbridge Borough Council,
Civic Centre, High Street, Esher,
Surrey KT10 9SD

Dear Mr. Parker,

HAMPTON COURT STATION & THE JOLLY BOATMAN SITE Planning Applications 2008/1600 (Full Application)

Please find in this brochure the response from the Hampton Court Rescue Campaign to the above new Planning Application. A separate document will be submitted referring to Planning Application 2007/2971/1/2.

Much of the content of both documents is identical - the difference is mainly directed to the proposed alternative schemes for the hotel on the Jolly Boatman site.

Because of the short time allowed for the receipt of responses from consultees HCRC reserves the right, if necessary, to make supplementary submissions containing corrections and/or additional material.

Yours sincerely,

Brian Rusbridge. Joint Co-ordinator

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HAMPTON COURT RESCUE CAMPAIGN

PLANNING APPLICATION. 2008/1600 (Full application)

SECTION 1. - THE COMPELLING CASE FOR REJECTION

The Hampton Court Rescue Campaign, with 3,000 supporters, calls for the rejection of the Planning Proposals in their entirety. Taken unilaterally any one of the sections listed below justifies rejection of the applications – taken together the case becomes overwhelming.

The applicants seek to advance an outrageously spurious claim that, by covering the entire Hampton Court site with an intensive, high rise building development they are rendering an outstanding service to Elmbridge Borough Council and the communities on both sides of the River Thames by putting right an area “that has been an eyesore for years”.

In fact the “eyesore” exists because of a calculated policy of neglect by the current owners and their predecessors for more than 20 years. The station buildings have fallen into ruins and the land bordering the riverside in front of the station has remained overgrown and littered with rubbish. (GladeDale Developments have rejected offers by Hampton Court Palace to landscape the Jolly Boatman site free of charge). The aim has been to create a public attitude that, “Anything is better than this”.

The future of the Hampton Court site must be determined by an impartial review in which all the local authorities involved; the communities on both sides of the river; Historic Royal Palaces; English Heritage; Thames Landscape Strategy and all other relevant bodies join together to devise a comprehensive plan based solely on the national, local and public interest. This will never be achieved by developers, either those in place or those who may follow, whose sole interest is financial gain.

The Hampton Court Rescue Campaign insists that the time has come to bring this unseemly charade to an end

**SECTION 2. - GOVERNMENT PLANNING POLICY STATEMENT 25.
DEVELOPMENT & FLOOD RISK ASSESSMENT (PPS 25).**

Note: Detailed comments on Flood Risk related to Hampton Court Station and the Jolly Boatman site are to be found in Appendix 1 attached.

Planning Policy Statement PPS. 25 is so critical to Planning Applications 2008/1600 that it merits specific attention.

PPS. 25, published in December, 2006 directs any potential development to areas of lowest flood risk. A “Sequential Test” is required so that sites at little or no risk of flooding are developed in preference to areas at higher risk. Where the “Sequential Test” shows there are no available sites at lower risk of flooding and the need for vulnerable developments e.g. new homes outweighs the flood risk then PPS 25 imposes a further test – the “Exception Test” to ensure that buildings that have to be built in high risk areas are safe and less susceptible to flood damage.

Despite the fact that Hampton Court Station and the Jolly Boatman site are rated 3 (the highest level of flood risk) the Developers have made no effort to conduct a “Sequential Test”. Thus there is no evidence that the Developers have tried and failed to locate sites of low flood risk on which to erect the developments contained in Planning Application 2008/1600. In addition there is no evidence produced to indicate that the need for vulnerable developments on the site outweighs the flood risk. *(Any such assertion would immediately be challenged by the Hampton Court Rescue Campaign.)*

Any claim by the Developers that the Sequential Test and the Exception Test do not apply to the Hampton Court Station/Jolly Boatman site because their proposed comprehensive developments are inextricably linked with the Railway Station *(which cannot be located on any other site)* must be refuted immediately.

Network Rail has the responsibility for restoring and maintaining Hampton Court Station in top condition and for the funding thereof. The building developments proposed in Application 2008/1600 are a commercial venture and are not inextricably linked to the station itself. Thus the Developers are at fault in not conducting the Sequential and Exception Tests. **THIS, ON ITS OWN, IS SUFFICIENT REASON FOR THE REJECTION OF PLANNING APPLICATION 2008/1600.**

SECTION 3. - FLOOD RISK

Definition of responsibility

The task of the Environment Agency is to identify areas of Flood Risk. It has clearly defined the whole of the Hampton Court/Jolly Boatman site as Flood Zone 3 (the highest risk). This imposes an obligation on potential developers to apply the Government's Planning Policy Statement 25, involving a Sequential Test and an Exception Test.

The responsibility for ensuring that the requirements of the Planning Policy Statements are fully observed by the developers falls entirely on the Local Authority and is not shared by the Environment Agency. Since the Applicants have failed to demonstrate that they have applied the Sequential Test and the Exception Test for a proposed development in Flood Zone 3 it is the duty of Elmbridge Borough Council to rule immediately that Planning Application 2008/1600 is invalid. Thus there is no reason for the detailed application to receive any consideration beyond this point.

SECTION 4. - FLOOD RISK MITIGATION – PPS. 25

The Hampton Court Rescue Campaign is unable, for reasons outlined above, to identify any reason for Elmbridge Borough to consider the whole application in detail. If, however, the Council chooses to do so then "Flood Risk Mitigation" must be brought into play. PPS 25 states that, in extreme cases, if any developments are allowed on Flood Zone 3 then the Applicants are obliged to reduce the overall impact of flood risk through the layout and form of the project development and the appropriate application of sustainable techniques. The construction of an underground car park would appear to have exactly the opposite effect.

This view is supported by the Applicants who are on record as saying it is their intention to provide flood gates to prevent the car park from flooding when floods are foreseen. Clearly a single event of flooding of the underground car park could be catastrophic in terms of harm to persons and the contamination by fuel, lubricants etc. from submerged vehicles.

SECTION 5. - FLOODS – ESCAPE ROUTES

The closure of the flood gates in the underground car park immediately removes the main vehicular escape route for occupants of the site, notably the residents of the Star & Garter Home. In addition Planning Application 2008/1600 identifies the narrow (6 metres) road from Hampton Court Way to Cigarette Island as the route for service and emergency vehicles. Apart from the underground car park this is the only other vehicular escape route in the event of flooding. Since the Cigarette Island (site service) road inevitably will be under water it becomes impassable. Thus all the

occupants of the site who require evacuation by ambulance etc. are marooned with no means of escape to dry land.

SECTION 6 - FLOOD RISK ALLEVIATION

The Applicants propose the use of a geo-cellular storage system to contain some of the flood water. These are essentially plastic tanks buried a short distance below the surface. This is unproven technology and should be viewed as highly suspect. The Applicants themselves admit that it does not provide the ideal solution. The Environment Agency cites the need for maintenance storage tanks but adds the caveat that it takes no responsibility for data provided in the Applicant's Flood Risk Assessment. The Council should not accept this material unless it has been subjected to a thorough and independent assessment.

SECTION 7.-.THE ACTIVITIES OF THE ENVIRONMENT AGENCY.

The evidence so far, subject to any further responses by the Environment Agency to Planning Application 2008/1600, is that, in making their observations to Elmbridge Council the Environment Agency has relied almost entirely on discussion and evidence submitted to it by the Applicants. Planning Application 2008/1600 is so critical and has such profound implications that it merits a special and independent study by the Environment Agency, including site visits. (Had it done so it would have exposed the major flaws in the Environment Assessment presented by the Applicants) .Until this is done then any observations by the Environment Agency on the suitability or otherwise of the Applicant's proposals to build in a High Risk Flood Zone must be interpreted by Elmbridge Council with the greatest caution.

SECTION 8.-.DEPARTMENT OF COMMUNITIES & LOCAL GOVERNMENT

The rigid application of Planning Policy Statement 25 was vigorously endorsed on 12 June 2008 by Minister for Planning, Caroline Flint. Her opening statement reads:-

“Councils must get tough on protecting people in flood risk areas.”

SECTION 9. – AIR POLLUTION

The Hampton Court Rescue Campaign is aware of the attention now being paid by Elmbridge Council to the question of Air Quality. HCRC urges the Council to have particular regard to Application 2008/1600 for an intensive residential development on the Hampton Court/Jolly Boatman site.

Since much of the policy on Air Management is still in the Council's pipe-line HCRC's comments have to be based largely on observation and common-sense.

It is understood that the area around Bridge and Creek Roads is to be designated as an Air Quality Management Area. Much of the air pollution in this vicinity stems from the high volume of traffic on Hampton Court Way. It follows that the Hampton Court Station site will be affected by air pollution equally as much as Bridge and Creek Roads.

Hampton Court Station site

Air pollution on this site. At present, is not a key problem because nobody lives there. This will be drastically altered if the Applicants' proposals are approved. Once built upon will be intensively occupied by dwellers in the residential blocks; those visiting the shops and café's thereon and those staying in the hotel on the Jolly Boatman site.

Of primary importance are the potential residents of the Star & Garter Home (if it is ever built). They are elderly and infirm people who will be heavily affected by polluted air. Good sense dictates that this is not the right place for the Star & Garter Home. Elmbridge Council has a duty to impress upon the Governors of the Star & Garter Homes of the adverse air pollution implications for the site at Hampton Court.

Excavation and Construction Period

This will cover a period of at least three years. The basic source of air pollution from cars in Hampton Court Way will still be there and will be worsened if the traffic of heavy vehicles into and out of the site results in long tail-backs with cars, at a standstill, pumping out fumes. The heavy vehicles involved in carrying earth and materials will themselves add substantially to the pollution levels. Also the excavation of the two-storey car-park will require heavy machinery and pile-driving equipment that will generate high levels of air pollution.

Anticipation of future pollution by Elmbridge Council

Elmbridge Council is called upon to look ahead and to anticipate the massive increase in air pollution that will be triggered off if the Applicants are allowed to proceed with their proposals. Common sense dictates that, there is justification for this reason alone, that Planning Application 2008/1600 should be rejected.

SECTION 10. – GROUND CONTAMINATION

The Hampton Court/Jolly Boatman site has a long history of potentially contaminative land use, predominately because it was used for many years (since 1868) by the Railway Authorities as an Engine Shed, Siding and Turntable for steam locomotives. A letter (17 January 2008) from the Head of Environmental Health and Licensing, Elmbridge Borough Council to the Head of Town Planning contains a statement, “Based on this history and the site investigation already carried out where the elevated levels of contaminants were found, we believe there to be a potential risk to human health and to the wider environment”. It then goes on to recommend further intrusive ground investigations to identify any further risks and to identify a remediation strategy to reduce these risks.

The Hampton Court Rescue Campaign does not have readily available the resources or the expertise to check and evaluate the highly technical data involved – nor is aware that it has in fact been placed in the public domain. Good sense however dictates that the excavation, piling and tanking necessary to construct a deep underground car-park must, unavoidably, have a profound effect on the flow of under-surface water and drainage. This applies both during the construction stage and as a permanent feature if the Applicants are allowed to proceed with the project to completion. (*HCRC says they should not*).

HCRC has nevertheless a profound feeling of unease that the whole question of ground contamination has not been accorded the importance it merits, either by Elmbridge Council or the Environment Agency. (If this is an unfair comment then it is incumbent upon both organisations to provide the public with an open and honest account of what is at stake and what has been done).

HCRC is also uncomfortable if approval were to be given to an Application with conditions to apply at a later date either during the construction stage or during the lifetime of the completed project. It is essential that all conditions are rigidly defined and, if possible, in place before the main construction commences. In a project as complex as this it will create chaos if, at some stage, work is brought to a standstill until a condition has been complied with – it simply extends the already onerous construction period.

In essence the Hampton Court Rescue Campaign urges that none of these eventualities should arise because permission for the total project to proceed should be refused outright

SECTION 11 .-.PROTECTION & ENHANCEMENT OF THE NATURAL & HISTORIC ENVIRONMENT. (See Appendix 2)

The Hampton Court Rescue Campaign is unswerving in its insistence that the Hampton Court/Jolly Boatman site must be accorded the highest significance as a dominant feature in a wide area on both the North and South sides of the River Thames. Any policy for its future must have regard for:-

1. Its national importance as a transport venue handling annually vast numbers of visitors, many of them from overseas.
2. Its vital contribution and place in the local community.
3. Its highly significant location and setting in the environs of Hampton Court Palace and the River Thames. (National Historic Environment).

Any decision on future policies for the site must therefore have full regard for all three of the above features, but for the moment Section 9 focuses on Item 3 and deals with the “National and Historic Environment”. (*Other sections will deal with the other features*).

Over a number of years the Hampton Rescue Campaign has kept in close touch with Historic Royal Palaces and has the greatest admiration for the documents produced by the latter recording the views of the Palace on the significance of Hampton Court Station and the Jolly Boatman site. These describe, so well, the history and long running abortive discussions with successive owners and potential developers. This is presented most effectively in a letter of 7 December 2007 sent by Historic Royal Palaces to Elmbridge Council. The Hampton Court Rescue Campaign is pleased to endorse the content of this letter and therefore includes a copy at Appendix 3. This document makes full reference to the place of the policies contained in the Replacement Elmbridge Borough Local Plan. (REBLP).

It is accepted that Historic Royal Palaces may up-date its views in the light of Planning Application 2008/1600 Elmbridge Council may also up-date REBLP. Taking this into account HCRC reserves the right to make a supplementary submission at a later date if this is called for.

All the evidence points to the fact that the Applicant’s proposals contained in 2008/1600 are totally out of character with this historic site so closely related to Hampton Court Palace. **This on its own provides a compelling reason for the outright rejection of the application.**

It should be noted also that the Campaign to Protect Rural England wrote to Elmbridge Council on 9 February 2008 registering strong objections to proposals to build on the Jolly Boatman site. One point they made is particularly significant, “As currently proposed, the hotel and its setting in no way meet policies EVV2, RTT1 and RTT2 of the Local Plan, nor the Surrey Structure Plan nor CC12 of the South East Plan.” It would appear that the developer’s proposed amendments fail to correct the failures highlighted by the Campaign to Protect Rural England.

SECTION 12. – TRANSPORTATION *(see Appendix 3 for a more detailed commentary)*

Two Distinct and Separate Problems

Elmbridge Council must recognise that the traffic flows in the vicinity of Hampton Court Bridge have two quite separate features:-

1. The main road traffic routes to and fro across Hampton Court Bridge. *(Referred to as the “Traffic Hub”)*
2. Road traffic entering and emerging from the Hampton Court/Jolly Boatman site including any changes introduced by the proposals in Application 2008/1600.

The Traffic Hub.

Hampton Court Bridge and the road network in its immediate vicinity is at the hub of a traffic complex extending for miles around. (Some 2,000 vehicles per hour, at peak times, in each direction). Over many years road users have been acutely aware that a fundamental review of the road network is called for and this can only be undertaken by the combined efforts of:-

- Surrey County Council
- London Borough of Richmond
- Elmbridge Borough Council

There is no evidence that this has ever been attempted nor is there a long-term plan for improvement. It is ludicrous even to suggest that this fundamental traffic problem will be resolved by ill-considered solutions prompted by the Applicant’s proposals to make localised changes to the entrance and exit points at Hampton Court Station.

Hampton Court Station – Entry and Exit

In terms of volume, vehicles entering or leaving Hampton Court Station, (although marginally changed by the proposals in Application 2008/1600) are expected to remain relatively small by comparison with the main traffic flows along Hampton Court Way.

This, however, must not obscure the vital fact that the problem of maintaining a continuous traffic flow, in both directions, along Hampton Court Way, is so fragile that even minor disruptions generate immediate tail-backs for miles around.

Although it must always be an objective to design the entry and exit points at Hampton Court Station to allow the traffic from its car-park to infiltrate easily into the main traffic flow – in no way can it be allowed to dictate the road layout affecting the network for miles around.

Road Traffic Proposals in Application 2008/1600

It is almost inconceivable that Surrey County Council has entered into an understanding with the Applicants to introduce a localised new road layout in the immediate vicinity of the southern end of Hampton Court Bridge. The only possible explanation is that it introduces alleged (*but controversial*) local improvements paid for by the Applicants. This immediately poses the following questions.

- Will these, narrowly focussed, changes improve the overall traffic flow in both directions along Hampton Court Way and will it address the fundamental existing problems of the “traffic hub”. The answer has to be NO. It may well introduce more disruption and worsen the existing problem.
- Will the changes facilitate entry and exit to Hampton Court Station? Detailed examination produces no evidence that it will do so and that it is more than counter-balanced by the traffic flows over a wider area.

Action to be taken

Elmbridge Council should reject the proposals to alter the road layout in the vicinity of Hampton Court Station on the grounds that any changes should only be made after there has been a wide-ranging review of traffic problems over a wide area (*The Traffic Hub*) conducted by Surrey County Council; Richmond Borough Council and Elmbridge Borough Council.

SECTION 13. – CAR PARKING. BUS STATION. UNDERGROUND CAR-PARK

The proposal by the Applicants to create a two-storey underground car-park is completely unacceptable to the local community.

The existing surface car-park

This is located on Network Rail property and offers 238 car parking spaces. Whilst it is well used by commuters there are, normally, a substantial number of spaces unused. The high daily charge imposed by Network Rail drives many commuters to park in the prime residential streets of East Molesey. Ideally a partnership between Network Rail and Elmbridge Council with a modest daily charge would fill the car-park every day and ease the pressure on the surrounding roads. This would also benefit the Bridge Street traders whose customers today are forced find spaces outside the “commuter parking zone” with a long walk to reach the shops.

The closure of the Station Car-Park

From Day 1, when excavation and construction commences, the existing Station surface car-park will close and remain closed for three years. This immediately pushes all existing users on to the residential roads of East Molesey multiplying the existing congestion and chaos over a wide area. Nothing in the Applicant’s proposals makes provision for temporary parking during excavation and construction.

Traffic chaos during the Excavation and Construction Period (3 years)

The fragile and highly sensitive traffic flows in the vicinity of Hampton Court Station has already been explained in Section 10 above. “Even minor disruptions generate immediate tail-backs for miles around”.

The task imposed by the Applicants’ proposals of excavating thousands of tons of soil and hard-core, followed by a two year construction phase, involves a constant movement of giant vehicles into and out of the site. How these vehicles can be integrated into the main traffic flows, going both ways along Hampton Court Way, is beyond comprehension. Every breakdown and accident - for which there is a high potential – spells disaster and grid-locked traffic for miles around. The proposal for the construction of a new road lay-out in the vicinity of the Station is a recipe for even further chaos.

Elmbridge Council must not allow this to happen and, if it does so, must take full responsibility for the results.

Post-construction

It should not be imagined that, after 3 years of chaos and the opening of the underground car-park, that all will be well. Section 9 explains THAT IT WILL NOT.

Underground Car-park. Allocation of spaces.

The Applicants indicate that the underground car-park will offer 238 spaces. Of these 16 will be reserved for Star & Garter and 33 for the residential element of the scheme thus leaving 189 spaces for allocation by Network Rail – for commuters and members of the public. (*Compare this with 234 spaces on offer today*). **THERE IS NO CAR-PARKING PROVISION FOR VISITORS AND STAFF FROM THE HOTEL NOR FOR CAR OWNERS PATRONIZING THE RETAIL ELEMENTS.**

The conclusion has to be drawn that, even if there were a modest charge for car-parking there would be insufficient overall space and cars will continue to be forced on to the residential roads in East Molesey. This does not substantiate a claim by the Applicants that the proposals bring benefit to the community – quite the reverse.

Hazards of the Underground Car-park

Bear in mind that this is two storeys under the surface approached from Hampton Court Way via a long and somewhat tortuous subterranean tunnel. Because of the difficulties of vehicles exiting and entering there is a strong possibility that, at times, slow moving queues will form inside the car-park. This will create noxious fumes that are hazardous for the occupants of the waiting cars.

Once having left their cars or proceeding down the stairs or lifts, persons using the car-park are virtually isolated, with little or no means of attracting attention if they are in trouble. Thus they are at the mercy of vandals, thieves and sexual predators. This applies particularly late in the evening. Hampton Court Station, over the years, has not had a happy record in this respect.

The overall undesirability of an underground car-park

All of the above features, when added to the risk of flooding, cause HCRC to insist that Elmbridge Council refuses permission for the construction of an underground car-park.

Coach parking

Currently coaches are allowed to park adjacent to Hampton Court Way immediately to the south of the Railway Station. The Applicants now propose to erect a massive new block on this site that will entirely eliminate coach parking in this area. NO PROVISION APPEARS TO HAVE BEEN MADE IN APPLICATION 2008/1600 FOR AN ALTERNATIVE PLACE FOR COACHES TO PARK. A coach park is an essential feature for the many visitors who come annually by this method. **Elmbridge Council must address this in reaching their decision.**

SECTION 14 – CONSERVATION AREA (Kent Town) & ELMBRIDGE LOCAL DEVELOPMENT FRAMEWORK (Core Strategy)

Conservation Area - Boundary

The East Molesey Kent Town Conservation Area was originally designated in 1973 and extended in 1994 and 2000. (*After the 1999 Development Brief*). The last extension included the rest of the Hampton Court Station site; Cigarette Island and the Grade II listed Lutyens Bridge. The original designation statement notes that the attraction of the Conservation Area lies in it being a good example of Victorian domestic architecture and planning. Obviously the buildings on the Hampton Court Station site and the bridge fall into this category. In extending the Conservation Area Elmbridge Council also had in mind the sensitivity of the whole site and the adjoining river frontage; the need to support the relevant proposals in the Thames Landscape Strategy (Kew to Hampstead); the unusual contribution made to Cigarette Island and the importance of the bridge in making a contribution to the special interest and character of the area.

The Conception and Interpretation of conservation areas

There can be no hard and fast rules on how to identify a conservation area; the justification for its creation and what changes (if any) should be allowed within its limits. It is an essentially subjective judgement involving bringing together a wide range of personal opinions including that of the community.

Clearly this was achieved in creating and extending the Kent Road Conservation Area. What is now at stake are the proposals by the Applicants to make permanent and extensive changes to that part containing the Hampton Court site.

The fact that this stems from the Applicants, whose primary aim is concerned with commercial gain and profit, must be treated by Elmbridge Council with the greatest caution.

Are the Applicants' proposed changes to the Kent Road Conservation Area acceptable?

The response by the Hampton Court Rescue Campaign is a resounding "NO". The judgement has to be made on the effect of the total project on the Conservation Area. There is an immensely strong ground-swell of public opinion (as evidenced by letters from members of the public on the Elmbridge Council website) that indicate the proposals are so massive; concentrated and of incompatible design as to make them completely unacceptable in the Kent Road Conservation Area.

Efforts by the Applicants to direct attention to only one feature currently the design of the hotel) are a reprehensible attempt to divert attention from the unacceptability of the total scheme. *The submission by Clare Smith, Principal Landscape & Heritage Officer, Town Planning Division should be read in conjunction with this).*

EBC. Conservation Areas Advisory Committee

It is unfortunate that the CAAC, having registered their overall objection to the Applicants proposals, go on to comment on what, in its view, might be acceptable on the Hampton Court Station site. The issue before the Council is whether or not the total scheme is or is not acceptable. Neither the Council nor the CAAC is called upon to advance a gratuitous view on what, in different circumstances and at some time in the future might find favour. Such statements only have a place after an intensive consultation exercise with the public and after much research by Elmbridge Council.

Local Development Framework (Core Strategy)

The Elmbridge Local Development Framework is a series of documents that will guide the future of Elmbridge and development within the Borough into 2020 and beyond. An important feature of this is the provision of affordable dwellings. Obviously the on-going policies of the Core Strategy must have a close relationship with any proposals to erect dwellings on the Hampton Court site.

Because of the limited time allowed for responses to Application 2008/1600 HCRC has not had sufficient time, nor access to all the relevant material to make a full submission on this issue. *HCRC therefore reserves the right to do so by way of a supplementary submission at a later date).*

Elmbridge Council carries a heavy burden of responsibility for the decision it makes on Application 2008/1600. If building is allowed on the Hampton Court Station site which does not fit with the aspirations of the Elmbridge Core Strategy the damage will have been done and will be irreversible. Elmbridge Council are called upon to inform the public of where it stands in this respect.

SECTION 15. – MASSIVE OVER-DEVELOPMENT

It is exceedingly difficult for the ordinary members of the public even to begin to comprehend the massive scale and bulk of the development enshrined in Application 2008/1600. They have been subjected, by the Applicants, to a succession of exhibitions and leaflets each highlighting selective illustrations of just one small piece of the total site. This led a minority, who took it at its face value, to say “Yes” on pre-printed cards – justifying it to themselves by saying that anything is better than the mess existing at the present time. Those who persisted in trying to get the full picture invariably expressed a resounding “No” in the thoughtful letters addressed to the Council.

Had the proper procedure been carried out by applying the “Sequential Test” contained in PPS.25 many of the questions would have been answered. As it is the strong feedback coming to the HCRC is that the Applicants proposals envisage a gross over-development for which there is neither demand nor justification. If the public had been shown something like the illustration contained in **Appendix 5** they would have re-acted immediately with horror at the concentration of buildings crammed on to the Hampton Court site.

Only a very few will have registered the scale of the building scheduled to face on to Hampton Court Way. Its elevation reveals a style totally out of keeping with the location and produces a “tunnel-like” effect for that portion of Hampton Court Way.

Calculations by HCRC reveal that the total “new build” on the site is some 20 times the size of the existing station!

Were a proper exhibition to be staged giving an unbiased picture of the proposed total development on the lines of the illustration in Appendix 5 HCRC is confident that the answer would be a forceful and conclusive “No” to the total project.

In the light of this HCRC is convinced that Elmbridge Council has no alternative but to reject the 2008/1600 in its entirety

SECTION 16. – 1999 DEVELOPMENT BRIEF

The Hampton Court Rescue Campaign insists that Elmbridge Council should set aside the 1999 Development Brief as being out-dated and no longer relevant. It should not therefore be used as a determining feature in the consideration by Elmbridge Borough Council of Planning Application 2008/1600.

Section 1 of this submission makes the case for a total rejection of the Application. If this is done plus the withdrawal of the 1999 Development Brief then the way is open for all the interested parties (including the local communities) to start again, with a clean

sheet, to review the future of Hampton Court Station/Jolly Boatman sites as “The Gateway to Hampton Court Palace”.

A major reason for the withdrawal of the 1999 Development Brief is that there is no reference to “Flooding” (*see Section 2 of this document*). The designation of the sites as Zone 3 Flood Risk occurred after the publication of the 1999 Planning Brief. The Government Planning Policy Statement 25 imposes an obligation on applicants to conduct Sequential/Exception Tests for any proposals to build on a high risk Flood Zone; this came in December 2006 and thus did not feature in the Development Brief.

It is pointless for Elmbridge Council to engage in an involved argument with the Applicants on whether or not the proposals are within or without the 1999 Development Brief if the Brief itself is no longer relevant.

Additionally Government Planning Policy Statement 1 imposes an obligation on Elmbridge Council and the Applicants to protect and preserve the Historic Environment. This too came after the publication of the 1999 Development Brief.

The objectives of the Government Planning Policy Statement are incorporated in the Replacement Elmbridge Borough Local Plan (REBLP) 2000, as amended in 2003. Obviously this too happened after the publication of the 1999 Development Brief so adding an additional reason for it being out-of-date. (*Section 2 and Appendix 2 contain specific references to REBPL 2000*).

Reference should also be made to a letter referring to Applications 2007/2970 and 2098/1600 from Dr. Laurence Shafe, dated 30 July 2008. This provides an itemised list of instances where the applications conflict with Elmbridge Council’s Replacement Local Plan and its planning guidelines

Warning

If Elmbridge Council fails to withdraw the 1999 Development Brief it will find itself engaged in an abortive discussion on whether the Applicants’ proposals are, or are not, within its parameters. In view of the many detailed and complex facets involved this could be a lengthy process.

If the 1999 Development Brief is used as a reason for rejecting the Application Elmbridge Council will have to justify why it has done so. This may cause the Applicants to withdraw to evolve yet more amendments to its proposals. Meanwhile the Applicants will ensure that the whole site remains derelict.

Since it is abundantly clear that the 1999 Planning Brief is no longer relevant it should be withdrawn and the Application rejected on the wide range of objections identified in this memorandum. This is a clean-cut operation which allows immediate and positive progress to be made towards identifying a strategy for the future of the site that reflects its true national and local significance.

SECTION 17. – THE ROYAL STAR & GARTER HOMES

The Hampton Court Rescue Campaign makes it clear that it supports in every way possible the work of this charity devoted to the care of disabled service personnel. The fact that HCRC is obliged to question the plans of the Governors of RS&G, in relation to Hampton Court, must not be construed as an attack on the charity itself

The decision makers at Elmbridge Council must be made fully aware that the Royal Star & Garter Homes, having been persuaded by GladeDale and Network Rail to join them in the submission of Planning Application 2008/1600, has been ruthlessly used as an emotional “front” for the entire and comprehensive proposals for the entire site.

HCRC must express great concern that RS&G has locked itself in to an inseparable planning application with two other partners who, unlike RS&G, are motivated solely by commercial gain. Thus RS&G has committed itself to a controversial, complex and comprehensive proposal for the whole of the Hampton Court/Jolly Boatman site including residential blocks, commercial premises, a hotel and of course a home for the disabled. It involves a massive constructional project, not least to excavate an underground car park in the middle of a flood risk area.

With a wide area of Southern England from which to choose an open site with no inherent constructional problems and with the good will of the surrounding community HCRC finds it difficult to understand why RS&G has chosen to involve itself with the Hampton Court Planning Applications with all their complexities, risk of lengthy procedures and the ultimate risk of failure. The last thing that HCRC wants is for RS&G to get hurt in the process

Hampton Court is not a suitable location for a new Star & Garter Home.

The decision makers at Elmbridge Council need to study carefully the planned layout for the overall scheme proposed by the Applicants. It reveals that the new Care Home occupies a position at the southern end of the existing car-park, wedged between high rise residential blocks and adjacent to the railway line carrying travellers into Hampton Court Station (not a peaceful and relaxed location for the disabled inhabitants of the Home. *(See also Section 9 for comments on air pollution).*)

Disabled people, particularly those in wheel chairs, will be isolated on the Hampton Court site. For them to attempt to cross Hampton Court Way to East Molesey, using the proposed new pedestrian route, would be unwise if not impossible.

The Hampton Court Rescue Campaign earnestly hopes that the Governors of the Royal Star & Garter Homes will review their involvement in Planning Application 2008/1600 and withdraw. If Elmbridge Council rejects the total scheme, and with it the proposed Star & Garter Home, it will force the Governors of the Home to look elsewhere. In doing so HCRC is convinced it will be saving future residents of the Home from a move to a location entirely unsuited for their needs.

A most apposite letter appeared in the local press written by Annette Waldman of Ham Common, who has direct knowledge of the Star & Garter needs and believes a move to Hampton Court would be a mistake. She has kindly agreed for her letter to be included in this submission. (Please see Appendix 4)

SECTION 18. – THE PROPOSED HOTEL

Application 2008/1600 differs from Application 2007/2970 only in the design and cladding of the proposed hotel. The vast and congested bulk of the overall development remains the same.

The HCRC re-action

The Hampton Court Rescue Campaign continues to insist that Application 2008/1600 must be rejected in its entirety. This means that the hotel is not approved and will not be built.

The design of the new hotel

In HCRC's book this is not an issue because it will not be built. Nevertheless because it is part of the total application HCRC feels it must comment because the proposed hotel is totally out of keeping with the location. Its monolithic bulk and height dominates the riverside and skyline as seen from Hampton Court Palace. Design and cladding, however it is presented cannot alter this.

The construction of a forecourt and patio presents a harsh and unsympathetic vista in a location which HCRC claims should be a rural, landscaped setting of trees, lawns and bushes. The forecourt because of its mixture of uses also constitutes a hazard for pedestrians because heavy vehicles cross the forecourt. **THERE IS NO NEED TO WASTE TIME. ELMBRIDGE COUNCIL SHOULD REJECT THE TOTAL PLAN AND WITH IT THE HOTEL.**

Proposed development facing on to Hampton Court Way

This encompasses the Hotel entrance; the North and South Lodges and the Hampton court Way “barrack block”.

Obviously, with a total rejection of the overall scheme none of this will be built but because of its gross and intrusive impact HCRC feels obliged to comment on its sheer bulk and the “slab-like “ vista it presents to those approaching from East Molesey. The general public have not seen most of the drawings and elevations and are completely unaware of the massive and unwelcome changes it will bring to this area.

The elevation presented in Appendix 6 gives some impression of the unwelcome immensity of the proposals. Appendix 7 homes in on the existing station and illustrates how the hotel and adjacent buildings will completely overwhelm this listed building.

ALL OF THIS SPELLS OUT THE NEED FOR THE TOTAL REJECTION OF THE ENTIRE SCHEME.

SECTION 19. – STATEMENT OF COMMUNITY INVOLVEMENT

In support of their Application 2008/1600 the Applicants submitted a Statement of Community Involvement. **The Hampton Court Rescue Campaign insists that this must be disregarded.** This Statement is the outcome of an attempt by the Applicants to subvert the principles of proper consultation advocated by Elmbridge Borough Council which says that it should be an honest and transparent dialogue with the public.

Among the methods employed by the Applicants to market their proposals via exhibitions and leaflets is the device of highlighting just one feature of their total project. The promotion of a Star & Garter Homes is an example. Members of the public were invited to tick a box on a card to be sent to Elmbridge Council supporting the building of a Care Home for S&G. They were completely unaware that this would be construed by the Applicants as a vote in favour of the total project. No provision was made on the card to register a vote against.

Currently the public are invited to register a choice on which of two designs of the hotel they prefer. No provision is made for them to register that no hotel should be built on the Jolly Boatman site. Nor were they given an option to express a view on the proposal covering the whole of the Hampton Court/Jolly Boatman site which is the real issue now before Elmbridge Council.

An example of the manipulation of public opinion is a statement on Page 28 of the Applicants’ submission that a street by street analysis of 555 replies from the public, registered by a tick-box on a card, indicates that 71% of respondents agreed that the

Applicants proposals “are progressing in the right direction”. Only 10% were recorded as being in disagreement.

The Applicants have ignored a spate of thoughtfully written letters, submitted to Elmbridge Council by local residents, in relation to their Applications 2007/2970 and 2008/1600. An analysis of all the Letters of Representation received by the Council at the date of this submission reveals a totally different and diametrically opposite picture to that presented by the Applicants. Of the Letters of Representation from East Molesey residents over 80% OBJECTED to the Applicants proposals. (*Only a few tick-box postcards were in favour*).

The points raised in the thoughtful letters from the public in East Molesey resonate with many of the objections to the totality of the Applicants proposals made by the Hampton Court Rescue Campaign in this submission.

SECTION 20. – CONCLUSION

This brochure contains many individual reasons why Application 2008/1600 must be rejected in its entirety. Taken in total they present an irrefutable case for rejection.

ELMBRIDGE COUNCIL IS URGED TO DO THIS – SO OPENING THE WAY FOR A FULL AND IMPARTIAL REVIEW OF THE FUTURE OF THE SITE IN WHICH THERE WILL BE FULL AND EXTENSIVE CONSULTATION WITH THE PUBLIC.

THE HAMPTON COURT RESCUE CAMPAIGN

APPENDIX 1

FLOOD RISK – Planning Application 2008/1600

PLANNING POLICY STATEMENTS

A series of “Planning Policy Statements” set out the Government’s national policies on different aspects of land use planning in England. Developers submitting planning applications must satisfy the relevant Local Authority that their proposed schemes comply with the requirements set out in the Planning Policy Statements. The Environment Agency must also have regard for these requirements in the advice the Agency gives to Local Authorities and Developers. However, the final responsibility for ensuring that the requirements of the Planning Policy Statements are met falls entirely on the Local Authority alone and is not shared with the Environment Agency. The statements are particularly relevant where the land proposed for development is designated as “High Flood Risk”. For reasons stated below **The Hampton Court Rescue Campaign calls upon Elmbridge Borough Council to reject in their entirety the above Planning Applications on the grounds that the Applicants have failed to satisfy the Council that the requirements of the Planning Policy Statements would be met if the Applications were to be approved.**

FLOOD RISK ZONE

In 2004 the Environment Agency produced new Flood Zone Maps which defined the Hampton Court Station/Jolly Boatman sites as lying within “Flood Zone 3”. This is the category which identifies areas at the highest risk of flooding. The Elmbridge Borough Council 1999 Development Brief is thereby out-dated and should have no relevance in the consideration of Planning Application 2007/2970.

The Flood Risk designation “3” determines that both the Applicants and Elmbridge Borough Council must be satisfied that the standards and regulations contained in Planning Policy Statement 25 (December 2006) have been met.

The Hampton Court Rescue Campaign calls upon Elmbridge Borough Council to reject Planning Application 2008/1600 in its entirety on the grounds that the Applicants (in their Environment Impact Assessment and Flood Risk Assessment) have failed completely to demonstrate they have conducted a full and impartial assessment of the conditions contained in PPS. 25 and, additionally, they have wrongfully claimed compliance for reasons that are grossly distorted and irrelevant.

PLANNING POLICY STATEMENT 25. ANNEX D.

This defines two tests that must be applied to all proposals for new development. (The “Sequential Test” and, *only if the former is applied and is failed*, the “Exception Test”). The aim of this policy is to steer new development away from areas of high flood risk (e.g. Hampton Court/Jolly Boatman – Zone 3 - highest risk) towards areas with minimal flood risk (Zone 1 – lowest risk).

The Sequential Test

The “Sequential Test” is applied where no suitable land can be found in Zone 1 areas (lowest risk) and, failing this, to judge whether development should be allowed in Zone 2 areas (intermediate risk).

The Hampton Court Rescue Campaign calls upon Elmbridge Borough Council to reject Planning Applications 2008/1600 in its entirety on the grounds that the Applicants have failed completely properly to apply the Sequential Test and have failed to demonstrate that there are no alternative (and more acceptable sites) on which to build the structures contained in Planning Application 2008/1600.

The Applicants seek to justify their omission with the unsupportable assertion that it is not required because their proposed development involves improvements to the Railway Station. This is an utter fallacy and a deliberate attempt to evade the “Sequential Test”. The duty of Network Rail, after many years of neglect, to restore the Railway Station stands on its own. It is not dependent on any development on the remainder of the site. The proposed development must, therefore, be judged on its own merits which leaves the Applicants no alternative but for the full conditions of the Sequential Test to be applied by the Applicants or the Council.

The Exception Test

Only where the “Sequential Test” is properly applied and is failed i.e. it is not possible to identify areas for the proposed development in Flood Zones 1 & 2 is it legitimate for an “Exception Test” to be applied to test whether building development can be allowed on land in Flood Zone 3 (Highest risk). Since the applicants have failed properly to apply an adequate “Sequential Test” there are no grounds for claiming an exception.

Even if a valid case were to be made for an Exception Test the Applicants must demonstrate that the proposed development provides wider sustainability benefits to the community that outweigh flood risk. No such case can be made for the developments proposed for the Hampton Court Station/Jolly Boatman sites, none of

which are essential to or favoured by the community. On the contrary, the density, scale and massing of the proposed buildings and the excavation of the underground car park are overwhelmingly environmentally detrimental to this site, the locality and its infrastructure. It should be registered that the site is already recorded as a Conservation Area. The proposals have met with widespread local opposition

FLOOD RISK MITIGATION – PPS.25

In extreme cases any developments, if allowed in Flood Zone 3, place obligations upon Applicants to reduce the overall impact of flood risk through the layout and form of the proposed development and the appropriate application of sustainable techniques. (The construction of an underground car park would appear to have exactly the opposite effect).

The intention, stated by the Applicants to the Environment Agency in January 2006, to provide flood gates to prevent the underground car park from flooding when floods are forecast indicates there being a significant risk of such an occurrence. But, the provision of flood gates is not mentioned by the Agency as a required condition of planning permission. Clearly, a single event of flooding of the underground car park could be catastrophic in terms of harm to persons and contamination by fuel, lubricants etc. from submerged vehicles.

By way of alleviation the Applicants propose the use of a geo-cellular storage system (essentially plastic tanks buried below the surface). Plastic Tanks may fail when subjected to the likelihood of heavy pressure from service and emergency vehicles and lack of maintenance. The Applicants themselves admit that it does not provide the ideal solution.

The response from the Environment Agency (Para. S.106. Agreement Recommendation) cites the need for maintenance of storage tanks. It adds the caveat that the Environment Agency takes no responsibility for data provided in the Applicants' Flood Risk Assessment.

Hampton Court Rescue Campaign asserts that the use of geo-cellular storage systems is unproven technology which should be regarded as highly suspect and inappropriate for the Hampton Court Station/Jolly Boatman sites.

In addition HCRC maintains that the construction of an underground car park will distort the flow of below-surface water and drainage (sometimes referred to as the "shadow effect"). The precise nature of this is unproven and has not fully been taken into account in the Applicant's proposals.

ENVIRONMENT AGENCY

The Hampton Court Rescue Campaign is deeply concerned that the Environment Agency, in its submission of 28 January, 2008 failed to identify and comment on the fundamental flaws in the Applicants' proposals in the context of the site's high flood risk exposure and the fact that the Sequential Test required by PPS25 had not been properly applied either by the Applicants or Elmbridge Borough Council. It is submitted that the Environment Agency relied too heavily on data presented by the Applicants and failed to conduct its own independent and thorough investigation. Had it done so it would have exposed the major flaws in the Environment Assessment presented by the Applicants.

In addition Hampton Court Rescue Campaign maintains that the construction of an underground car park will distort the flow of below-surface water and drainage (sometimes referred to as the "shadow effect"). The precise nature of this is unproven and has not been fully taken into account in the Applicant's proposals. The Applicant's Flood Risk Assessment does not include estimates of the velocity and volume of flood water and the direction of flow. Could their proposed system cope with the onset of deep and fast flowing floods from two rivers? There has to be danger that the entry to the storage tanks will be blocked by debris. Flood water can be polluted by domestic sewage. If polluted water is allowed to enter the tanks then evidence is needed about how the tanks can be decontaminated.

07 December 2007

Martin Parker
Head of Town Planning
Elmbridge Borough Council
Civic Centre
High Street
Esher
Surrey KT109SD

Dear Mr Parker

HAMPTON COURT STATION AND THE JOLLY BOATMAN SITE,
HAMPTON COURT WAY, EAST MOLESEY, KT8 9AE
APPLICATION NUMBERS: 2007/2970 - FULL PLANNING; 2007/2971 -
CONSERVATION AREA CONSENT; 2007/2972 - LISTED BUILDING
CONSENT

I am writing to set out Historic Royal Palaces' objections to the proposed planning application scheme at Hampton Court Station and the Jolly Boatman site, application references as above. Historic Royal Palaces was created in 1998 by Royal Charter as an independent charitable trust, charged, for the benefit of the nation, with the responsibilities of caring for, conserving and presenting to the public the unoccupied royal palaces. As guardians of Hampton Court Palace, we have very serious concerns regarding the proposed development of this site and its potential impact on the setting of the palace, its gardens and park, and the surrounding area. Our objections focus on particular areas of concern which are related to relevant national, regional and local planning policy, including the 'saved' policies of the Replacement Elmbridge Borough Local Plan (REBLP) 2000, as detailed below.

The impact on the setting of Hampton Court Palace

The significance of Hampton Court Palace, its gardens and estate is beyond question and lies in the combination of important cultural qualities - both tangible and intangible - that together make it an outstandingly special place. It is a unique combination of a Tudor and Baroque palace, retaining its palatial setting largely intact. It was the location of key events in England's religious and political history. Its significance is reflected in the palace being a scheduled monument and statutorily listed at grade I, and whose gardens and park are included at grade I in English Heritage's *Register of Parks and Gardens of special historic interest*. The close relationship between the palace buildings, gardens and park, its setting by the River Thames for ease of transport, and its surrounding park for hunting, were key attractions to the kings and queens who have lived there.

While the location and setting of the palace is highly significant, the juxtaposition of the surrounding park and gardens with the palace is vital: the vistas within and without give the impression of an even

larger ensemble. Key prospects, such as the Long Water, Ditton and Kingston Avenues, and the view northwards into Bushy Park and southwards over the river to the playing fields and Cigarette Island, still give the impression that this area of historical, horticultural and ecological importance is peacefully unaffected by the development surrounding it.

Until the 20th century, the land opposite Hampton Court Palace remained open, except, from 1849, for the railway tracks. The trees lining the banks of the Thames and the Embur enfolded Cigarette Island in greenery. From the beginning of the 20th century, when Metropolitan London was growing westwards and East Molesey and Thames Ditton were becoming commuter suburbs, those responsible for Hampton Court Palace strove to keep the Surrey shore opposite the palace as open land, in order to protect the rural ambience of this important ensemble and its setting. In 1902, it was suggested that the Government should acquire the land immediately opposite the palace to ensure 'that the amenities of the Palace and Gardens may in future be preserved' and, in 1910, the area which is now Cigarette Island Park was acquired for the nation. As a result of a Town Planning Scheme¹ proposed by the then local council in 1926, for which funding was sought from the Government, Cigarette Island was transferred to council ownership² in return for protective covenants to ensure that it remained public open space in perpetuity. The proposed Town Planning Scheme had originally aimed to include the station and associated railway land, in order to extend the enhancement of the south bank as far as Hampton Court Bridge, but the Southern Railway Company formally objected to the scheme, which did not proceed for lack of funding.

As present custodian of the palace, Historic Royal Palaces has for many years consistently advocated that the site of the former Jolly Boatman restaurant should not be redeveloped, but cleared and landscaped to reinforce and extend the rural parkland character of the Surrey bank of the River Thames along Cigarette Island to Hampton Court Bridge. In 2004, we commissioned a study on ways in which views to and from the palace might be protected and managed. This study, the *Hampton Court Palace Views Management Plan*, which was the subject of wide public consultation and the principal

1 The Urban District Council of East and West Molesey

2 By the Urban District Council of Esher

recommendations of which have been adopted as policy by Historic Royal Palaces, concluded that development on the Jolly Boatman site would have a seriously detrimental effect on the immediate setting of the palace and on the historic rural character of the adjoining area. The study recommended that the existing development brief for the Jolly Boatman and Hampton Court Station sites by Elmbridge BC should be

reviewed as a matter of urgency.

We have therefore sought to ensure that no more than small scale development, such as information or refreshment kiosks, should be allowed on the former Jolly Boatman site. Indeed, it is Historic Royal Palaces' view that the rural nature of the site should be strengthened in order to 'preserve or enhance' the character of this part of the conservation area and the setting of the palace. We opposed the earlier scheme for these sites by Country and Metropolitan/Network Rail because of the principle of development on the former Jolly Boatman site. We also deplored the proposed density and scale of development on the station site, the inappropriate nature of the scheme and its poor design. Historic Royal Palaces commissioned a further detailed study related to the *Views Management Plan, a Historic Landscape Assessment and Landscape Development Strategy for the Hampton Court Station/Jolly Boatman site*, focusing specifically on this site. This study, which has been made publicly available, sets out our understanding of the history of, and aspirations for, the former Jolly Boatman site. A copy of the study is appended to this letter, for ease of reference. In contrast, the application scheme proposes a four storey hotel and restaurant building on the Jolly Boatman site, which would dominate the river bank in this location by virtue of its orientation, bulk and external materials (largely white painted timber weatherboarding and reflective sheet glass), and the hard urban-style landscaping in front of it, extending right down to the water's edge. The design of this building is said to stand within a tradition of waterfront buildings, including mills, boathouses and pubs, but there are few examples of this genre - and certainly none in the locality - of the scale or prominence of the proposed hotel.

We also continue to deplore the density and scale of the development on the station site. The developers claim that the quantum of development proposed is the minimum required to make the application scheme financially viable, because of the very high infrastructure costs involved. Certainly, it is evident that the construction of the proposed double deck underground car park must account for a significant part of these costs - but we question the need for the extent of the car parking proposed (see below). For whatever reason, the outcome is a high-density, monolithic scheme, generally four storeys in height, which will appear from Hampton Court Palace as a continuous wall along the eastern boundary of Cigarette Island and rising above the existing East Molesey skyline. The designers have sought to reduce the bulk of this part of the proposed development by modulating the frontage facing Cigarette Island, but the dense, urban nature of the scheme is inappropriate in our view and essentially out of place in this suburban/rural context.

Planning Policy Guidance note 15 (PPG15) *Planning and the Historic Environment* points out that local planning authorities must have special regard to certain matters, including the desirability of preserving the setting of a listed building, when considering applications for planning permission which affect a listed building.³ The setting is often an essential part of the building's character. The guidance continues by noting that the setting of a building may often include land some distance from it. Specifically, the PPG states that '*A proposed high or bulky building might also affect the setting of a listed building some distance away, or alter the view of a historic skyline. In some cases, setting can only be defined by a historical assessment of a building's surroundings*'. This exercise was undertaken by Historic Royal Palaces through the commissioning of the *Historic Landscape Assessment and Landscape Development Strategy for the Hampton Court Station /Jolly Boatman site* study. The bulk and height of the proposed hotel development and its proximity to the Thames and the palace are much greater than the existing buildings on the station site and would have a considerable impact on the historic setting of the grade I listed Hampton Court Palace. REBLP policy HEN7 is consistent with the approach set out in PPG15 in stating that proposals for development will only be permitted if they do not harm the setting of a listed building. Historic Royal Palaces considers that, due to its scale and bulk, especially of the hotel adjacent to the riverside, the development proposed on the application site is not in accordance with this policy since it would harm the setting of the listed Hampton Court Palace. For the reasons set out in our *Historic Landscape Assessment* study, we believe that this part of the overall site should remain free of built development and be landscaped as an extension of the Cigarette Island Park, continuing its parkland as far as the grade II listed Hampton Court Bridge.

Impact on views of and from Hampton Court Palace There are important and significant views of Hampton Court Palace from both the river and surrounding area. REBLP policy ENV27 designates the Palace as a 'Key Landmark', with a number of related Strategic Views identified on the Proposals Map. The policy states that 3 As required by Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 these views have been identified in order to protect their intrinsic character and amenity value; and that any development affecting strategic views or key landmarks will not be permitted if it has an adverse impact on the setting, character and amenity value of the view or landmark, or if its location, massing, height and configuration are not acceptable in terms of the impact on the site, near or long distance views and the skyline. Although the policy does not specifically

identify the views between (from or to) the palace and the Jolly Boatman site, Historic Royal Palaces believes that, due to the proximity of the application site to the palace, all views in this direction are significant and should be afforded an appropriate level of protection. All the representative views provided in the application indicating the outline of the proposed development, especially those from Hampton Court Palace,, show foliage on a majority of the trees. We consider that these representations are misleading, since the indicative outlines are barely discernible against the trees: winter-time views would provide a very different impression. Because of its scale, massing and height, the proposed development would have a significant impact on views of the palace from the train station and immediately surrounding area, particularly as the proposed riverside hotel and restaurant is a prominent, four storey building set forward of the existing station building. Views from both East Molesey and the station exit, from which large numbers of visitors have their first clear view of Hampton Court Palace, will be either blocked or adversely affected (see below).

The impact on the River Thames

The location of the proposed development on this important site adjacent to the River Thames will have significant impacts on the river and its setting. REBLP policy RTT1 requires proposals for development to maintain and enhance the unique character of the River Thames, including significant views, vistas and key landmarks along, and conspicuous from, the banks. The explanatory text particularly highlights that the relationship with the opposite riverbank and vistas extending beyond the river corridors will also be taken into account, and that this approach is essential in the vicinity of Hampton Court Palace and its associated parkland. Historic Royal Palaces considers that the scale and design of the proposed development is not in accordance with this policy, since it clearly does not maintain or enhance the unique character of the river, due to the monolithic nature of the overall design and its considerable height and bulk, particularly of the hotel building fronting the river. The significant and important view of Hampton Court Palace from the station, from which large numbers of visitors approach the palace, will be significantly reduced due to the location and screening effect of the proposed buildings. Having left the station and passed the corner of the hotel building, the visitor's first view of the palace will then be across the new paved 'public square', a hard and urban-style space that will not contribute either to the riverside ambience or to the essentially rural character of the setting of the palace.

The application site is located within the Thames Policy Area, which the *Thames Landscape Strategy* (2006) works to improve, in order to make it more accessible to all, with increased ecological, educational,

amenity and economic opportunity. REBLP policy RTT2 states that development within or conspicuous from the Thames Policy Area will only be permitted where, amongst other factors, it makes the best use of the riverside location; the impact of design, character and scale on the skyline and views is acceptable; and it ensures the retention of buildings and features which make a valuable contribution to the historic character of the river. Points (i) and (ii) of REBLP policy RTT7 state that all riverside development should sympathetically reflect the riverside location and take advantage of outlook and orientation, whilst also being in harmony with surrounding buildings in both scale and character. The proposed character, bulk and massing of the application scheme is considered to be out of scale with the site and its surroundings and therefore not appropriate for this riverside site. It will have a detrimental impact on the skyline due to its height, which in turn will have an impact on views across the river. The area of the site between the proposed hotel and the river does not appear to have been designed to relate sympathetically to the riverside and the views across to Hampton Court Palace, nor to the adjacent Cigarette Island Park. Described in the application as a 'new high quality paved public meeting place', this substantial open space descends in a series of steps towards the park, but is otherwise largely unrelieved and urban in character. It is in part a shared surface, mainly for the use of pedestrians, but also providing access for service and emergency vehicles to the residential blocks and the Star and Garter home along the east side of the site and for maintenance vehicles to Cigarette Island Park. The riverside is reached by a flight of stone steps which extends across the entire width of the site and runs into the abutment of Lutyens' listed bridge. The grandiose scale and metropolitan nature of this new frontage would form a hard, urban contrast to the adjacent park and the character of the Thames banks east of Hampton Court Bridge, which are so important to the setting of the palace. It would increase and make permanent past harm rather than taking the opportunity for preservation and enhancement which has been a public goal for this area for over a century. The wider impacts on Hampton Court Palace's role within the local area

Impact on the visitor experience

Hampton Court Palace is a significant visitor attraction in the local area and beyond, indeed nationally, attracting considerable number of visitors throughout the year. These visitors undoubtedly contribute to the local economy through spending in local shops, restaurants and other facilities, particularly in Bridge Road, which clearly has a symbiotic relationship with the palace. For a significant number of these visitors to the palace, their experience starts at the train station, with glimpses of the palace ensemble through the trees from the

arrival platform. A panoramic view of the palace in its wider setting is then revealed as the visitor emerges from the station buildings and walks towards Hampton Court Bridge. While the existing Jolly Boatman site clearly needs improvement, Historic Royal Palaces does not consider that the application proposals enhance the area in an appropriate way, particularly as the existing views of the palace from the station will be significantly curtailed. Policies for the West Front of the palace contained in our *Hampton Court Palace Views Management Plan* include an aspiration to selectively thin the Norway Maples to open up views towards the palace from the south side of the river and particularly East Molesey.⁴ This aspiration will not be achieved if the tree screen has to be maintained in order to protect views out from the palace.

Highways and traffic

Hampton Court Palace is one of the largest employers in the local area and also the venue for both occasional and regular events, such as the Flower Festival and winter skating rink: it therefore generates a significant amount of traffic. Although it is sited on the opposite side of the Thames, all traffic leaving the palace currently must turn left over Hampton Court Bridge and then right from Hampton Court Way into the gyratory opposite Hampton Court Station and back over the bridge in order to travel either north or west. This situation, which we are powerless to remedy, has long added to traffic problems in East Molesey and has, understandably, caused local tensions. The application proposals appear likely worsen the situation, since it is clear that the right turn opposite the station will no longer be available to vehicles needing to return north over Hampton Court Bridge. Historic Royal Palaces recognises that it is not for any development on the application site to remedy this problem, which has its origin on the north side of the river, but neither would we expect existing circumstances to be made worse. It is unclear from the application drawings and supporting information how vehicles leaving Hampton Court Palace can make their way north or west, short of travelling some considerable distance south along Hampton Court Way to the 4 Section 4.12 The West Front, policy R4.12 Imber Court roundabout and returning north through East Molesey to re-cross Hampton Court Bridge.

Other relevant issues Parking

The application proposals state that a total of some 287 car parking spaces will be provided in the development, of which 238 are 'replacement' parking for the 214 spaces in the existing station car park. Why is Network Rail getting an increase in parking spaces, when the existing car park is routinely never full? The remaining 49 car parking spaces are to be allocated to other components of the

development: 16 for the Star and Garter care home (an operator requirement) and 33 for the residential element. The extent of the parking provision has resulted in a double deck underground car park reached by a long, complicated ramp. This, as the developers have explained, drives up infrastructure costs, which in turn dictates a minimum quantum of development on the site. Historic Royal Palaces questions the validity of this cost/quantum argument and the need (with reference to Surrey Structure Plan policy DN3) for such extensive car parking in this location, close to a railway station, a travel interchange and on the edge of London.

Repair/restoration of the existing station building

As a key, although comparatively minor, objective of any development on the site, the proper restoration of the historic building must be guaranteed.

Although not statutorily listed, the station is on the Council's list of buildings of local interest, it makes a strong and positive contribution to the character of the East Molesey (Kent Town) conservation area and it is greatly valued by the local community. The application drawings indicating the proposed 'refurbishment' of this building are unconvincing - it is currently shown with stump chimneys and inappropriate windows. The station's proper restoration, externally at least, is essential.

Conclusion

Historic Royal Palaces is responsible not only for conserving and maintaining the palaces in its care, but also for seeking to protect the settings of their important historic sites. The significance of Hampton Court Palace, its gardens and estate is beyond question. The palace's setting by the river Thames, which survives largely intact, was a key attraction for the kings and queens who built and used it and remains so for all who visit it. Whilst we recognise that improvement of the Hampton Court station area is badly needed, we will continue to argue that the former Jolly Boatman site should remain undeveloped and should be landscaped as an extension to Cigarette Island in order to protect the vitally important setting of the palace. We maintain that an appropriate planning solution for the whole site included in this application must recognise the historic significance of the area and the criteria proposed in Historic Royal Palaces' recent studies. The application proposals fail to do so insofar as they address the river frontage and Palace beyond.

We therefore strongly urge the Council to refuse consent for the development as proposed in these applications. These representations set out Historic Royal Palaces' direct and principal concerns about the application proposals. We reserve the right to comment on other aspects of the scheme or issues arising from it at any future occasion on which representations are invited.

Yours sincerely

John Barnes
Conservation and Learning Director

HAMPTON COURT RESCUE CAMPAIGN

APPENDIX 3

TRANSPORTATION

THE HAMPTON COURT TRAFFIC HUB

Hampton Court Bridge and the road network in its immediate vicinity is at the hub of a road traffic complex extending for miles around with feeder routes encompassing Esher; Walton-on-Thames; Hampton; Shepperton; Chertsey; Weybridge; Sunbury; Kingston-upon-Thames. (*Referred to below as 'Extended Traffic Network'*). The Hampton Court road traffic hub is already working to capacity (some 2,000 vehicles per hour, at peak times, in each direction). Even minor traffic incidents and disruptions, particularly at peak times, (morning and evening and at week-ends) create extensive tail-backs. Current traffic flows are maintained with difficulty and much frustration and delay on the part of road users.

ASSESSMENT OF CURRENT AND FUTURE TRAFFIC PROBLEMS AT HAMPTON COURT

Independently of the Developers and in advance of any consideration of Planning Application 2008/1600 the above calls for intensive discussion between:-

- Surrey County Council
- London Borough of Richmond
- Elmbridge Borough Council

To determine:-

1. Whether it is possible to ease the traffic congestion.
2. Can this be accomplished by re-routing traffic flows from the outer perimeters extending miles beyond Hampton Court?
3. If so what plans can be made? (Some may be long term).
4. Are there factors that will worsen the traffic problem e.g. the new Walton Bridge, Heathrow expansion?
5. Are there any helpful changes that can be made in the specific locality of Hampton Court? (Recognising that these will be palliative only and small in comparison with the wide-spread traffic flows under review).

TRAFFIC IN THE IMMEDIATE VICINITY OF HAMPTON COURT

This can only be reviewed when there has been an overall assessment of the traffic demands over the wide area. (The Extended Traffic Network). Questions that have to be addressed are:-

1. What can be done to improve the entry and exit at Hampton Court Palace? (Currently emerging traffic can only turn left – not right towards Kingston).
2. What improvements can be made to the bus terminal at Hampton Court Station – both in the interest of passengers and easier exit on to Hampton Court Way?
3. Is a better road layout advisable to allow traffic coming southwards over Hampton Court Bridge to turn right into Hurst Road or Creek Road?
4. Is an improvement desirable to facilitate traffic emerging from Creek Road and turning right or left into Hampton Court Way? (Currently the controlled pedestrian crossing outside Hampton Court Station provides a break for traffic to emerge from Creek Road i.e. it halts the traffic temporarily going north along Hampton Court Way.)
5. Are the arrangements for traffic flowing along Bridge Road towards Hurst Road and the feed-in from Palace Road satisfactory or is there a better alternative?
6. Coach pick-up and drop off points and parking facilities are not satisfactory. Where should coaches park? Hampton Court Palace needs to be involved on this one.

THE APPLICANTS PROPOSALS' ON TRANSPORTATION

Against the need for a fundamental review of the 'Extended Traffic Network' and the 'Hampton Court Hub' the Applicants proposals for changes in the road layout, traffic control and pedestrian routes are exposed as being superficial and exceedingly narrowly based. They are made solely in the interests of the developers and it is inexplicable that Surrey County Council is able to say, without reason or justification, that "*In transportation terms the proposals are acceptable in principle*".

Nevertheless Planning Proposal 2008/1600 is on record and it is thus necessary for Hampton Court Rescue Campaign to comment. The fact that we do so in no way detracts from the main argument that the Developers' proposals are out of context, narrowly based and should not be taken into account.

Applicants' proposals to introduce split-level pedestrian crossings over Hampton Court Way.

The existing pedestrian crossing appears to cope adequately with the pedestrian flow across Hampton Court Way. At certain times of the day it is heavily used. The proposal by the Developers to introduce a split-level crossing appears unnecessary and dangerous. A large number of people can be trapped on a central island in the middle of both lanes of heavy traffic. This is not satisfactory.

Proposal to introduce a second split-level crossing across Hampton Court Way south of Creek Road.

To insert two sets of controlled pedestrian crossings within a short distance of each other interspersed with a proposed set of traffic lights at the exit of Creek Road – all in the passage of nose-to-tail traffic – is a recipe for disaster. It will substantially increase the traffic tail-backs.

Proposal to place an entrance to an underground car-park opposite the petrol station in Hampton Court Way. (*HCRC is opposed to an underground car-park*)

The proposals appear to allow a right-hand turn for north bound traffic to enter the tunnel. This involves crossing the south-bound lane. Very limited space is allowed for cars queuing to cross the south-bound traffic. If there is insufficient room in the waiting space then cars will halt in the main stream of traffic – result, an immediate hold-up and tail-back.

Cars exiting the tunnel appear to have only one option – to turn left in a southwards direction. Those wishing to turn northwards towards Hampton Court Bridger are obliged, firstly, to go south to the Imber Court roundabout (about $\frac{3}{4}$ mile) before joining the north-bound carriageway. At peak times it will thus take around half-an-hour to get back to the starting point opposite the tunnel. This does not seem a feasible proposition. (The Hampton Court Rescue Campaign is opposed to an underground car-park. If this is not installed then this problem does not exist).

Proposed access road for emergency vehicles to the Jolly Boatman/Hampton Court site.

The Developers propose this should be sited immediately adjacent to Hampton Court Bridge. This is not practical and will add to the congestion of traffic proceeding southwards over the bridge. Once into the site these vehicles follow a route along the river bank before turning right on a roadway between the rear of the new buildings and Cigarette Island.

Clearly this entry and route will be used not only for Ambulances and Fire Appliances but also for vehicles delivering to the proposed hotel, the residential blocks and the Care Home. Undoubtedly it will also be used by taxis, visitors to the Care Home and special vehicles for the disabled and by heavy duty refuse vehicles. Thus the potential usage of this so-called 'Emergency Route' will be far greater than that suggested by the Developers.

Note:

- The 1999 Planning Brief (Sect. 8.3) states "Servicing access should be discretely provided to the rear of the site away from the Thames frontage and must be designed to minimise pedestrian and service vehicle conflict."
- The evidence submitted by Clare Smith, Principal Landscape and Heritage Officer, Town Planning Division, on the routes for service vehicles raises similar observations to those listed above).

Developers' proposals for a revised road layout and traffic control opposite the Station on the other side of Hampton Court Way.

All of the above detailed Developers' proposals are integral and stem from the proposed intensive development on the Station site but there are further proposals for a revised road layout and traffic control on the other side of the Station opposite the Station. These have no direct link with the building developments envisaged in Planning Application 2008/1600, thus they are not within the province of the Developers. Such changes, whether or not necessary or desirable, are solely the concern of Surrey County Council and Elmbridge Borough Council and therefore should not form a part of the Planning application. The re-assessment of the wide ranging traffic issues advocated by Hampton Court Rescue Campaign to be led by Surrey Council is the proper place for these to be reviewed.

In this context Hampton Court Rescue Campaign has the following comments:-

- There is a proposal to erect a set of traffic lights where Creek Road joins Hampton Court Way. As it stands road traffic manages to negotiate this busy junction with considerable difficulty but at least keeps moving. The existing controlled pedestrian crossing opposite the Station, at intervals, halts the flow of traffic on Hampton Court Way and provides limited opportunities for traffic to emerge from and enter Creek Road. There is no evidence to suggest that a set of traffic lights will improve this – indeed there is every possibility that it will itself create hold-ups in the traffic in both directions on Hampton Court Way. This proposal should not even be contemplated without the most intensive investigation of its desirability and practicability.

In this context Hampton Court Rescue Campaign has the following comments:-

- There is a proposal to re-shape the traffic island at the junction of Hampton Court Way/River Bank (Hurst Road). Associated with this are proposals for reversing the flow of traffic along Bridge Road causing cars, wishing to enter from Creek Road to make an elaborate circuit utilising the existing lay-by immediately opposite the Station. Whatever the merits/demerits of this proposal may be it has little or no bearing on the Developers proposals for the Station site. Thus there is no reason for this to be part of the Developers proposal. It requires intensive examination by Surrey County Council and Elmbridge Council plus a major consultation exercise with the public. Among the reasons for this are:-
 1. Road users in this locality have day to day experience of traffic problems and will have a most useful contribution to make.
 2. The traders in Bridge Road will certainly be affected by the proposals for a reverse traffic flow and must be consulted.
 3. Residents entering and leaving Palace Road which feeds in to Bridge Road will need to be assured that any proposals for a reversed traffic flow are a practical proposition.

All of the above demonstrates the need for a detailed and extensive study of TRANSPORTATION AND CAR PARKING as outlined in the opening paragraph of this submission.

THE APPLICANTS' TRANSPORT ASSESSMENT

The Hampton Court Rescue Campaign finds this document to be flawed and unconvincing in its conclusions.

In paragraph 1.1.8 that Applicants claim that their scheme “*incorporates the findings of an extensive public consultation exercise*”. HCRC refutes this claim as yet another example of the manipulation used by the Applicants in its dealings with the public and with the Council. Indeed most of the letters of representation from local residents to Elmbridge Council express opposition to the proposed traffic scheme on the grounds of the additional congestion and parking problems that it will introduce.

It is disappointing to note that, according to the Applicants' Transport Assessment (*Para. 2.3.5*) Elmbridge Council still does not have a Local Development Framework and Supplementary Statement and has to rely on Surrey County Council for guidance. The Applicant Transport Assessment also says in paragraph 1.1.6 “that it “*also covers the agreements that have been reached with Surrey County Council, the Highway Authority for this area*”.

Appendix 3 cont.

A serious concern of the HCRC is that the road planning arrangements outside the actual boundaries of the site, but related to the Application; appear to have been devised behind closed doors by two sets of consultants (one employed by the Applicants). There is no transparency so far as the public is concerned and there is nothing to indicate whether or not Elmbridge Council, the responsible planning authority, has been monitoring or is aware of the agreements that are said to have been concluded.

IT IS AN INESCAPABLE FACT THAT ROAD TRAFFIC IN THE VICINITY OF HAMPTON COURT BRIDGE IS FREQUENTLY CONGESTED TO THE POINT OF STAGNATION AND GRID-LOCK. THE SMALLEST INCREASE IN TRAFFIC VOLUME FROM THE PROPOSED DEVELOPMENT WILL HAVE QUITE DISPROPORTIONATE ADVERSE EFFECT AND CREATE A TOTALLY INTOLERABLE SITUATION FOR WHICH ELMBRIDGE BOROUGH COUNCIL – AS THE PLANNING AUTHORITY – NOT SURREY COUNTY COUNCIL – WILL BE SOLELY RESPONSIBLE.

From: Waldman
Sent: 29 July 2008 00:04
To: 'campaign@zacgoldsmith.com'
Subject Proposed scheme for a new Star and Garter Home

Appendix 4.

Dear Mr. Goldsmith,

I am quite sure that you are aware of the proposed new scheme to develop Hampton Court Station and to include a care home to replace the present Star and Garter Home. I remember that when the proposed closure of the present Home was announced there was a promise that four homes would be built throughout UK, one being in the Richmond area. We understood that all these would be ready before the closure of the present Home.

The original Brief was written around ten years ago before the station area was classified as a high risk level 3 flood zone by the Environment Agency in 2004 and also the area we now learn is, in all probability, about to be designated an Air Quality Management Zone. We have been told that the building work for the whole of the project will take at least 3 years during which time contaminated material will have to be removed on a daily basis from the site. I understand that the area very near the proposed site is a conservation area and that the Historic Royal Palaces have also raised some objection to the proposed plans.

I live in Ham and have been associated with Richmond all my life. Through my late father who was a Governor of the Royal Star and Garter Home, I have an awareness of the needs of the residents there, I am strongly opposed to the scheme for a new care home to be included in the proposed development The Star and Garter home is a permanent home with resident trained nursing care for disabled ex service men and women. To house them in a mixed development on the corner of an extremely busy and noisy main road with only an access to a public garden is completely incorrect and unsuitable.

The Home needs to have direct access to private and quiet grounds of its own to enable the mainly exceedingly disabled men and women (many badly and permanently wounded in combat) to live out the remainder of their lives in as comfortable and quiet and essentially private (bearing in mind the type of disability of many) surroundings possible.

I realise that the present home which is huge, is probably no longer a viable proposition to run, but the residents will be losing nursing facilities, a hydrotherapy pool which has been such a wonderful asset, and well equipped workshops. The proposal for an ordinary care home could not be more incorrect There should be nursing and stimulation for residents who could be there for years. They have all spent time defending their country in war and peace time and now in wartime again and deserve better than being condemned to spend their years sitting around in a care home with no stimulation other than being pushed into a communal garden.

The Royal Star and Garter Home have sent out hundreds of pamphlets to people who do not live anywhere near Richmond or Hampton Court asking for their support for the new plans. They point out the wonderful transport, the nearby shops, the fact that there will be a hotel in the development etc. They do not mention the noise, the pollution, the huge main roads, the trains which only ran from Waterloo twice an hour and the busy road with traffic to and from the M3 and Heathrow. It is not even as easy as the train to Richmond and a bus up the hill to the Home which is surrounded by hotels and B and B's and has a unique view of the river and access to Richmond Park. Many of the letters sent by the Home have tear off leaflets backing the new plans - which, as it goes to many people completely ignorant of the position of the proposed new site, gives a completely false picture.

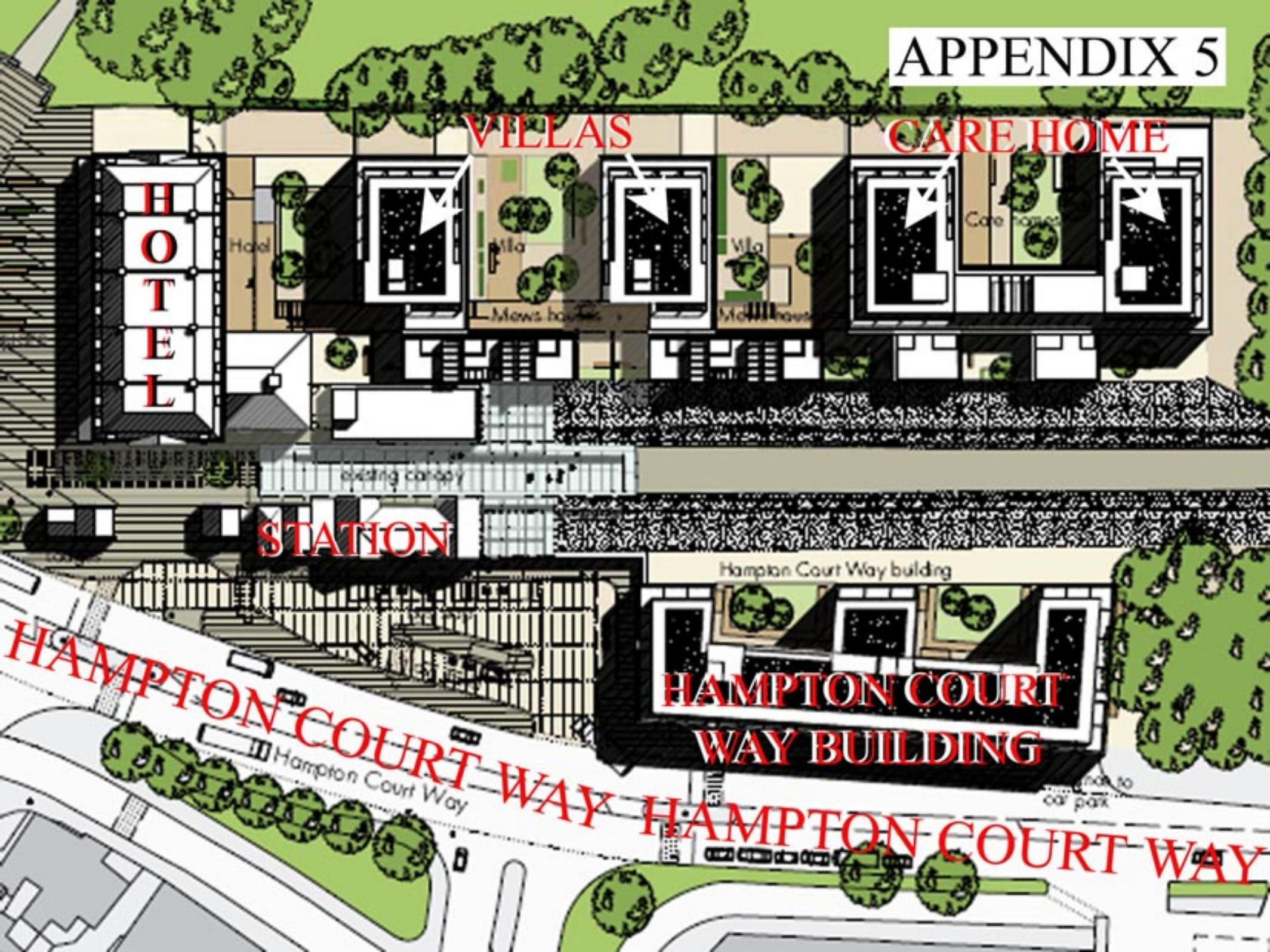
I know there is a Hampton Court Rescue Campaign but as I am not resident in the area, I cannot take part in this. My very genuine concern is to make sure that the Royal Star and Garter actually find a new home which will give our disabled ex servicemen and women the care and facilities they have earned in our defence.

As the prospective candidate for Richmond Park and as a dedicated environmentalist, I hope that you will find that you can help to support the objections of so many who know and understand the problems.

Yours sincerely,

30/07/2008

APPENDIX 5



VILLAS

CARE HOME

H
O
T
E
L

Hotel

Villa

Vila

Care Home

Mews house

Mews house

waiting canopy

Hampton Court Way building

STATION

HAMPTON COURT
WAY BUILDING

HAMPTON COURT WAY HAMPTON COURT WAY

Hampton Court Way

link to
car park

APPENDIX 6

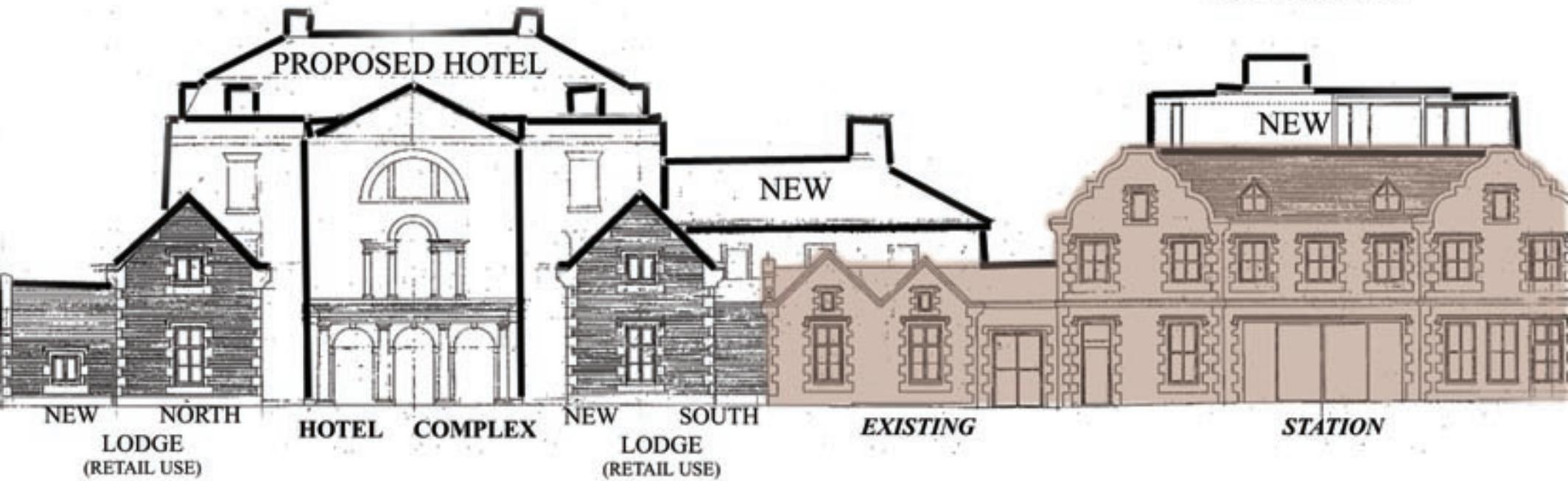


HOTEL

EXISTING STATION & CANOPY

HAMPTON COURT WAY BUILDING

APPENDIX 7.



THE VIEW LOOKING ACROSS HAMPTON COURT WAY FROM THE EAST MOLESEY SIDE