

Hampton Court Rescue Campaign
Response to Alexpo Public Consultation
‘Jolly Boatman’ & the Hampton Court Railway Station Site
1st of August 2018

We welcome and appreciate the constructive and ongoing dialogue with Alexpo, the new owner of the ‘Jolly Boatman’ site. Following our preliminary assessment of Alexpo's plans at a public exhibition on 20 June 2018, HCRC has consulted with other interested parties and can now provide an advanced assessment of the proposed scheme.

Background

The first detailed proposals for the site appeared in the 2002 accounts of County and Metropolitan. The scheme comprised five blocks of apartments on the Network Rail car park, but was not progressed to planning. County and Metropolitan was subsequently acquired by Gladedale Homes, who submitted, along with Network Rail, a comprehensive regeneration scheme in 2008 that swapped two of the five apartment blocks for a large Care Home. Although planning permission was granted, the Gladedale scheme was not implemented “because the cost of access arrangements made it unviable” as stated by Network Rail in its Land Disposal Consultation Report to the ORR in November 2016.

Acquiring the site in October 2014, Alexpo has now presented fresh proposals that are broadly similar to the 2008 Gladedale scheme but with the welcome omission of the Hotel on the ‘Boatman’ site. Costs for the Alexpo scheme have been trimmed by significantly reducing the car park size and configuration, and with a revised access road which removes much of the underground car park ramp. The proposed new car park has one level of ground floor undercroft parking and a half level of underground parking, whereas the previous schemes provided two full levels of underground parking.

Viability and Site Characteristics

The site has a number of challenging characteristics which have frustrated a long line of developers:

- The need to protect the setting of Hampton Court Palace.
- A sensitive refurbishment of the historic locally listed Railway Station in its entirety with the retention of its character and unique position in the heritage of East Molesey.
- Requirement for safe access to and from the site for cars, buses, pedestrians, commuters and cyclists and the guarantee of safe transit for visitors to Hampton Court Palace, an international tourist attraction - where visitor numbers have increased from 500,000 (quoted in the 2008 Gladedale scheme application) to the current level of 1 million plus.
- Costs to build the underground car park are prohibitive.
- Increased demand for affordable housing.
- The increased risk of flooding predicted by the Environment Agency.
- Year on year increases in construction costs and soft residential values.

These characteristics have substantive legacy implications which the planning authority and developer must address. HCRC has confidence that Elmbridge Borough Council will ensure that:

- The setting of Hampton Court Palace is enhanced.
- There is a positive impact on parking and the movement of vehicles to and from the site and on surrounding roads.
- The site will reasonably accommodate the continued exponential growth in visitor numbers to Hampton Court Palace.
- The car park size and affordable housing ratios are not substantively compromised to facilitate a scheme frustrated by low viability.
- The many objectives set out in EBC 1999 Planning Brief for the site still hold.

HCRC assessment of the proposed Alexpo scheme is as follows:

Car Parking

The existing and long-standing Network Rail car park at Hampton Court Station has 204 spaces, whereas Alexpo's current scheme proposes to include a single, additional car park space. The new 205 space car park will be required to cater for all rail-users (including Cross Rail 2 in the future), visitors to the area including to Hampton Court Palace, 97 residential apartments, a 72 bed hotel and an undisclosed number of retail units. This is to be compared with Gladedale's smaller scheme of 66 apartments, a 46 bed Hotel, retail units and a Care Home, which the Planning Inspector reasonably assessed as needing **287** parking spaces, of which **237** must not be reserved and therefore made publicly available.

We should note that the existing car park use fluctuates in line with the number of visitors to Hampton Court Palace and that current usage data is likely to be negatively affected by the temporary safety fence which constrains access.

HCRC is aware that the planning authority is encouraging less reliance on cars which we applaud, however post 2008 there is very limited evidence of a substantive modal shift in the use of cars and there is no justification for a reduced car park with only 205 spaces.

Our understanding is that the proposed car park size is driven by the developer's profit aspirations and does not reflect current demand, or any reasonable assessment into the future. For these reasons and with reference to the Planning Inspector's earlier report we believe that the proposed parking provision has no realistic chance of being acceptable to the planning authority. If this proposal was to be approved, it could be challenged in the Courts.

The inevitable impact of inadequate parking will be further congestion and intolerable overspill into East Molesey streets, a reduction in rail passengers who use Hampton Court as a terminal commuter Station and fewer visitors travelling to Hampton Court Palace.

Network Rail has also added that Crossrail 2 is likely to proceed with a doubling of the number of trains operating out of this station, utilising the two existing platforms which could increase the passenger demand for car parking spaces.

'Jolly Boatman' Site

Alexpo's proposed scheme reduces the building footprint on the Boatman site from the 2008 scheme, which HCRC applauds. We also welcome some improvement to the internationally acclaimed views of Hampton Court Palace enjoyed by visitors exiting the Station, but lost by the imposition of Gladedale's Hotel scheme and the erection of the 'temporary' hoarding around the JB site. The inclusion of some open space is a positive element, but we regret the use and widening of the existing Cigarette Island Park Maintenance Service Road as the primary access route into the whole site. The open space proposed will be divorced from the river and from Cigarette Island Park, and will be visually and functionally disappointing. We therefore urge the developer to consider locating the Park Servicing/Primary Access Road nearer to the Station building.

We note that in Alexpo's most recent design a proposed gable-end extends onto the Boatman site, 13 meters beyond the building-line of the current Station. Whilst its architectural treatment claims to relate to Hampton Court Palace and goes some way to break up an otherwise flat facade, we would encourage the developer to reduce its encroachment onto the Boatman site. The projecting wing reduces the opportunity for relocating the access road and impinges on the potential for the new public open space to visually and physically link with Cigarette Island Park.

Although HCRC takes issue with the totality of the mass of the scheme there are opportunities to adjust the positions of some elements of the development. For example, this could be achieved by moving the apartment blocks further east (as per the approved 2008 scheme) and by small reductions in the gaps between blocks together with a smaller gable. A combination of these strategies could reasonably adhere to the known building-line of the current Station footprint.

HCRC's key objective is to protect the unique setting of historic Hampton Court Station's relationship to Hampton Court Palace across the Thames corridor as an open, riverside space, brought about by the seamless integration of the Boatman land to Cigarette Island Park. Central to this plan is the

preference for 'soft edge' landscaping on the Elmbridge-side embankment and its landing-stage. This fits with the adopted plans of both Historic Royal Palaces and the Thames Landscape Strategy for the Thames hinterland, and would provide a continuation of the Albany Reach open aspect.

Pedestrian Safety and Access Road

Given the ever-increasing popularity and the number of visitors to Hampton Court Palace, pedestrian safety at the Station must be at the forefront of any scheme. At this time, the layout plans for the pedestrian/car passenger routes to and from the Station ticket office/machines and platforms, are not shown. These should be available on all future drawings to aid both the designer and the public's understanding.

The new plans for the Car Park adopt the current Park Maintenance Access Road. Its entrance will be immediately south of Hampton Court Bridge and take vehicles across the Boatman site, regulated by a pedestrian-crossing located in very close proximity to, and parallel with the highway. The bridge viewing platform turret creates a dangerous blind spot for vehicles turning left into the site when approaching from the Richmond side and creates a high risk to pedestrians crossing near to the bridge.

Alexpo is proposing a signalled-crossing to manage the conflict between cars and pedestrians here, but based only on the expectation of relatively few vehicle movements – averaged as roughly one per minute at peak time. However, the majority of pedestrians leaving the trains at Hampton Court Station move forward to Hampton Court Palace in waves, grouped together. Experience suggests that motorists turning sharp left from Hampton Court Bridge will have limited visibility and insufficient space and time to avoid pedestrians. Moreover, we believe that many visitors will ignore the signals at this location, creating unpredictable conflicts with cars. HCRC encourages the developer to explore alternative road and pedestrian layouts that increase visibility and minimise the foreseeable dangers.

HCRC would encourage the incorporation of a ground-level frontage 'kiss and ride' facility, as we believe it is unrealistic to expect passengers to be dropped off in the undercroft or underground car park, as it will be underused and not secure (or perceived as insecure). Any initiative to reduce car usage must offer a significant increase in cycle parking provision. HCRC considers that passenger cycle parking must be accommodated at a higher level than the current usage. The suggestion outlined in the 2008 scheme's Travel Plan with its location on platform 2 cannot be proposed as a long term solution, when CR2 has indicated the intention to use this platform.

Drawings and Visuals

Currently, the drawings and visuals made available by Alexpo do not provide interested parties or the public with sufficient information to properly assess the scheme. There are no upper-floor plans at this stage and many of the colour blocks do not have a use identified. Moreover, we would welcome visuals and elevations of the four apartment blocks as viewed from Hampton Court Palace and Cigarette Island. Computer-generated images of the views from the Palace should correctly reflect the seasonal flora and fauna.

Development Bulk and Mass

The inadequate plans and artist's impressions appear to indicate that the overall bulk and mass of Alexpo's proposals have been increased. The scheme is significantly larger in floor space and height than the approved 2008 plans. Then as now, this will have a negative impact on the locally-listed Station, designed by renowned Victorian architect Sir William Tite. Tite also created the London to Southampton Railway and a link to Windsor from Datchet for Queen Victoria. The Station is locally recognised as a "*Focal Building*" and Sir William Tite wanted its architecture to be in keeping with that of the Palace, at the end of an important view along the Bridge Road/ Creek Road vista in the adopted Conservation Area Management Plan. To preserve East Molesey's heritage, it is important that the height and mass of the apartment blocks and Hotel do not overwhelm this historic Victorian Station complex in scale, or diminish its important historical setting and significance. We therefore ask Alexpo to address the overall mass of the scheme.

The developer should be guided by the relevant extracts that are still applicable in the 1999 Development Brief (remaining as adopted policy where relevant) and not simply rely on the controversial design approved in the 2008 scheme. The Brief brought forward previous height and design policies which included at par 6.3:

“The South Western Railway Act of 1913 prohibits the development of any building greater than 15.5m (50 foot) within one and a half miles of Hampton Court Palace. However, whilst this might control development to an extent it is the Councils view that no development anywhere on the site should exceed three storeys plus a pitched roof which is likely to be substantially less than the 50 foot limit. This is to ensure that the development does not dominate the existing station, is below the tree canopy of the park and masses appropriately with the East Molesey Conservation Area buildings”

Presently there are no details for heights annotated on any buildings or sections which is key to an assessment of the impact on the surrounding area and skyline. HCRC also notes that the South Western Railway Act 1913 was intended to protect the setting of Hampton Court Palace and any measurement of height should therefore refer to the average level (measured in Meters AOD) on Cigarette Island Park and not the arbitrary highest point of the railway platform as was proposed by Gladedale in the 2008 scheme Design and Access document.

HCRC already considered the approved 2008 scheme, which comprised 3 floors + roof storey to be insensitive development, but which the Council Leader accepted and acknowledged “was just about OK”. The current proposals are for a design where most elements exceed the advised 3 floors + roof storey. The three apartment blocks facing the Palace rise a full 5 storeys when accounting for the raised ground-level of the undercroft car park. The new Hotel proposed for Hampton Court Way, will be an additional storey higher than the 2008 approved scheme. On height alone the development is categorically overdevelopment. Plans presented in the future should be annotated with the building heights, mindful of the adopted guidance that seeks a maximum of 3 storeys plus roof across the site.

Riverside Block (north of the Station)

The building line and reverse “S” plan form is geometric and relates to the Station platform and building only. It should attempt to be more creative and relate to the riverside, the main highway alignment and surrounding buildings plan forms more carefully. A building line more parallel to the river frontage would create an enclosure for the open space to be more prominent and effective.

The complete form is 4 storeys, and even with the fourth storey appearing to be part of the roof form, it creates a strong horizontal eaves line on the south elevation which sits behind and above the Station building, dominating what should be the focal landmark building at the end of a recognised vista.

Car park/Cigarette Island facing Blocks

While we do not have any east and west elevations or visuals, we can see from the sections that facing the Station the elevation will be 4.5 storeys and facing the park it will be a full 5 storeys - this being one complete storey higher than the 2008 approved scheme. What in the 2008 approval were lower Mews houses along the train-line appear to be full height blocks, although the plan form at the upper levels is unclear. The lightweight top storey does go some way to reducing the bulk of these structures but the density and raised ground floor will create a very overpowering built form that must surpass and break the 15.5m height limit which taken together with the Hotel block, will create a canyon effect.

Hotel/ Hampton Court Way Block

The visuals present a monolithic 4 storey rectangular block with a partial pitched roof and we assume a partial 5th floor which we expect will contain roof top plant and machinery. Both the front and rear elevations would benefit from some modelling and relief to the horizontal roof parapet. The developer should also consider stepping down the building height to 3 storeys including a roof form nearest to the Station forecourt.

The car park section visual (page 6 of Alexpo’s published exhibition banners) clearly demonstrates the repetitive long flat rear elevation set immediately upon the second Station platform, which together with the eastern 3 blocks and Mews blocks, will create a canyon effect and potential wind tunnel comparable to a train user’s expectations when arriving at a Central London terminus. This is suburban Surrey not Central London so building design, height and mass should respect our rural riverside setting and the close proximity to Hampton Court Palace.

The plan layout (page 4 of Alexpo's published exhibition banners) suggests that the Hotel block either touches the Station's existing second canopy over the second platform, or that the canopy is removed. This canopy forms part of the pair of original Station canopies and is integral to the historic Station as a covered exit route to the west. The building footprint should be moved away from these canopies (currently not shown on the visuals) to ensure that the Station survives in its entirety.

Impact of Construction

The construction project could take three years (to be confirmed) and during that time the Station car park will be more or less unavailable with very restricted parking. We urge the developer and Elmbridge Council to explore all realistic options to reduce the build-time and provide substantive, temporary parking during construction. HCRC will continue to work with local authorities to find a solution to reduce the impact of any project on surrounding roads. We broadly support the proposal to park on Cigarette Island Park during construction conditional on the protection of the existing trees and maintenance of public access to CIP. If EBC and residents do agree to temporary use of part of CIP for parking thus reducing the development build schedule and costs, as a quid pro quo, the developer should look at the treatment and future of the Jolly Boatman site in a different, more favourable manner.

Hoardings

The Boatman site enjoyed wonderful cross-river views of Hampton Court Palace when it was grassed-over for the Olympic cycling events in 2012. For the last five years the site has been characterised by an unattractive hoarding with no obvious prospect of development. Enough time has passed and we believe that as a gesture of good faith (unless construction is imminent) that the developer should remove the hoardings to re-open the treasured cross-river views.

In summary

We believe that a much better design of Access Road and a smaller scheme that do not encroach on the Boatman site are very reasonable demands. However, we question whether any developer can overcome the inherent site characteristics and provide sufficient parking and meaningful levels of affordable housing.

Our view is that Alexpo is no closer to having a scheme which can be implemented than the long line of previous developers. Furthermore, residents would not entertain a scheme which had a negative long term legacy.

HCRC is not opposed to a realistic, sensitive development to reflect the site's unique setting. We would look favourably on Alexpo reviewing the current scheme and giving consideration to other possibilities:

Scheme A - Revised Full Scheme: Alexpo could submit a more modest scheme as per the variations we have proposed, with a car park larger than the 2008 scheme that embraces the higher accommodation levels and suitable affordable housing ratios.

Scheme B – Staged Development: An alternative approach could be that with the reasonable permission of the local Authorities, Alexpo could part-implement Scheme A in the first instance by landscaping the Jolly Boatman site in its entirety and completing the Hampton Court Way portion of the development. Then, as and when there is a modal shift in the use of cars and therefore less demand for parking, re-submit a revised application to realistically develop the Network Rail car park site in say 5 – 10 years time. This would mean that in the short/medium term the Council and local community would be asked to accept a Hotel with retail/café and affordable housing without any additional car parking to cater for the increased parking requirement, other than the option to utilise the spare capacity at the existing Network Rail surface car park.

Scheme C - Hampton Court Way development and the sale of the Boatman Site: This scheme would consider the sale of the Boatman site to secure the land in perpetuity - meanwhile concentrating development on the expansive Hampton Court Way site. The scheme could include a revised Access Road, a 'kiss and ride' facility, a Bus Station, and the refurbishment of the Railway Station, but would omit any development on the current Station Car Park. This could be implemented with the support from all stakeholders and would allow the Boatman site to be permanently protected in its entirety as a public open space.

This scheme possibly has lower potential profit, but also carries much less risk or delays. As an incentive to Alexpo we believe that the sale of the Boatman site at a realistic, negotiated valuation would be warmly supported by all interested parties. This could be part-funded by strategic CIL funds and from third party funds which we believe will be forthcoming.

Given the complex legacy issues with this site we believe that it would be a disaster to use the scheme to attempt to drive the modal shift in car usage and we do not believe that any argument for low viability should be used to justify lower than acceptable ratios of affordable housing.

The challenge to achieve a sensitive, high quality development on the Hampton Court Railway Station and Boatman sites has lasted for over twenty years. For the last five years the Boatman has been boarded up and suffers from increasing ugly dilapidation. However now is not the time for Elmbridge Council and local residents to be seduced by the prospect of regeneration at the expense of a poor development with a very negative legacy. The enduring maxim that **'anything is better than this'** must not be allowed to stand. Alexpo's consultation is a welcome opportunity to advance a new sympathetic scheme, but to also indicate the limitations that our Council and local residents are willing to consider.

There is currently an implied threat that if Alexpo is not successful with its current plans then it will revert to the already approved 2008 scheme. This would defer to building a costly underground car park of 287 spaces, expensive underground ramped access, a Care Home, a reduced number of apartments and a smaller Hotel. The various site owners have had 10 years to implement the 'unviable' 2008 approved scheme and with soaring construction costs and a soft residential property market it is no more 'viable' today. We therefore do not believe that there is any chance that the 2008 Approved Scheme will be implemented.

HCRC Committee