



London
Campaign to Protect Rural England

THE ARCADIAN THAMES: planning policy ignored?



View from Richmond Hill
Photo: ajth on Flickr

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FOREWORD

Has the tide gone out for protection of this historic landscape?

Between Weybridge and Kew the river Thames meanders through a unique landscape of parks, royal palaces and working communities known as the Arcadian Thames.

Originally a private and privileged landscape, Arcadia was saved and democratised in the 19th century with many of the private estates being opened up for the public to enjoy.

The Arcadian Thames is symbolic. It represents the results of the conservation movement. Campaigners ensured that its history and illusion of 'rural paradise' survived the expansion of London by advocating that development in and around it should be controlled. The beautiful stretch of the river we call the Arcadian Thames which we all enjoy today would not exist if the UK did not have a system which effectively controls development and which places value on such things as heritage and countryside within the city for the enjoyment of all Londoners.

Of course the planning system does much more than place a value on heritage and illusion. Through a democratic process which is shared between local boroughs, London-wide as well as national politics, the system ensures there is space for business, affordable housing, retail, leisure, schools and so on. Or at least it did.

The Arcadian Thames is now under threat. And this is also symbolic. Across London developments are going ahead even though they do not meet the community vision set

out in the democratically agreed 'Local Plan' and even though they damage cherished places like heritage or conservation areas, or protected green spaces such as Green Belt, playing fields or parks.

Developments frequently don't contain the required number of affordable homes; they impact on protected views or the enjoyment of parks; they encroach on green space; units are crammed in without sufficient quality of buildings and spaces ... and on and on.

In other words the system which should balance development and community need is broken. The breakdown of the system of control is extremely problematic. This report demonstrates how this is playing out on the ground – specifically in the Arcadian Thames area – through taking a closer look at the journey through the planning system of a number of large and some smaller developments.

It just scratches the surface of the implications for the future of a system which is now loaded in favour of development, and by implication, developers – with local communities less and less able to be heard. Whilst building





on brownfield first is firmly on the national political agenda thanks to the work of CPRE and others, the liberalised regime compromises on quality and local involvement.

Traditionally local authorities have mediated between local communities and the 'big picture'. But their position has been weakened by being put in a Catch 22 situation where they are under pressure to allow unsuitable development or have control taken away from them.

For half a century UK governments have slowly taken more and more power to the centre, away from local authorities.

This latest onslaught can only be described as the dismantling of the planning system.

We can fight to save the Arcadian Thames but the reality is that this is a much bigger battle – to save any kind of semblance of local democratic control over our built and natural environment.

John Croxson
Chair, CPRE London



THE ARCADIAN THAMES:

a history of conservation
in 'London's countryside'

Since the successful campaign in 1902 to protect the 'View from Richmond Hill', the haven of green space along the Thames from Weybridge to Hampton to Kew has been conserved and protected. Also known as 'London's Countryside', this extraordinarily diverse landscape collectively contains more listed buildings, conservation areas, wildlife sites and registered parks and gardens than in any other comparable location in the UK.



The Pagoda at
Kew Gardens

It contains two of the UK's top ten most visited attractions, Kew Gardens and Hampton Court Palace. A natural area of biodiversity, it also contains the Site of Special Scientific Interest at Bushy Park, and provides increasingly important flood meadows for Greater London.

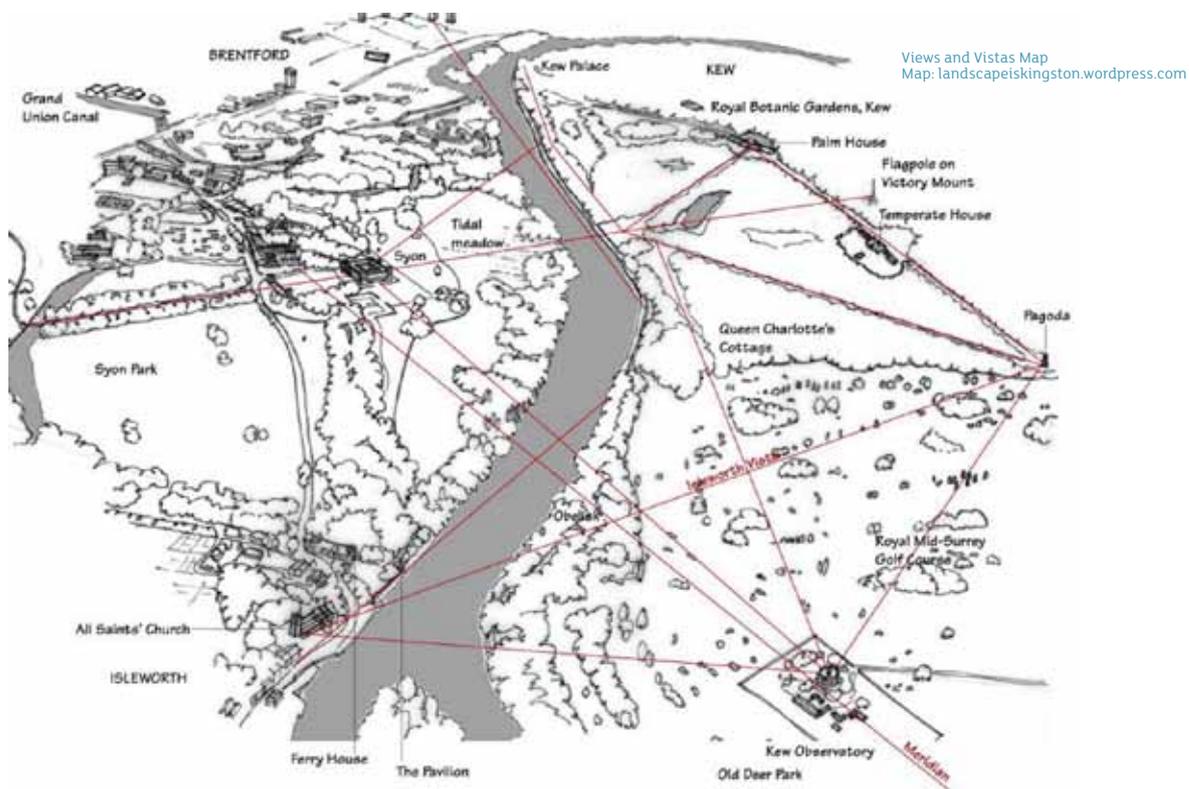
It has housed and inspired artists and writers, from Chaucer to Alexander Pope, Joshua Reynolds and Spencer Gore, to the Rolling Stones.¹

The Mayor of London has recognised the importance of the region in the London View Management Framework (2012; revised 2015) and has listed the view from Henry VIII's mount in Richmond across the Thames to St Paul's Cathedral as a protected view, constraining development from disrupting this historic sight line.

Many communities along the Thames from Kew to Weybridge have campaigned to protect their riverside landscape from encroachments by unsympathetic development. New local area

Hampton Court Palace





Views and Vistas Map
Map: landscapeiskingston.wordpress.com

The Arcadian Thames contains an elaborate network of framed view lines, avenues and vistas along and from the River Thames and Richmond Hill. This visual network gradually evolved from the early 17th century, formed by key landmarks such as palaces, villas, the Royal Observatory, Kew Pagoda, obelisks, bridges, church towers and spires, and the planted avenues which still provide definition and structure to the landscape today.

and neighbourhood plans have also contributed to conservation efforts. Historic England and Historic Royal Palaces also work consistently to protect views and vistas along the Thames, and their responses to planning applications can prove key in granting or denying permissions.

and railings, and paths were enhanced to increase access. Outreach programmes and volunteer efforts were also coordinated to ensure the continuation of the aims of the project. Since then, the Arcadian Thames has, according to the TLS, become an area of 'unrivalled public open access and recreational activities'.⁴

A charity committed specifically to protecting the green and open spaces along the river, The Thames Landscape Strategy (TLS), has for the past twenty-one years been at the forefront of conserving the Arcadian Thames and, in 2005, a major Heritage Lottery Fund grant allowed TLS to 'restore, open up, and enhance the view from Richmond Hill'.² This project involved the planting of trees and native hedgerows as well as reeds and sedges meant to restore the 'almost lost Thameside natural environment'.³ Historic features of the built landscape were also restored, including gates



The view of St Paul's Cathedral from Henry VIII's mound in Richmond
Photo: landscapeiskingston.wordpress.com



ARCADIA UNDER THREAT: the impact of the National Planning Policy Framework

Despite the clear consensus amongst the Mayor of London's Office, local amenity groups, and the TLS that this special landscape ought to be protected, recent planning decisions have demonstrated that other issues, such as affordable housing and the viability of urban regeneration, are more important than the preservation of London green spaces and riverside views.

While affordable housing and urban regeneration are undeniably key issues that require urgent attention, a closer look at how planning decisions are made often reveals that these issues are raised as a way of distracting decision makers from developers' drive to produce developments that will result in the highest possible profit. The frequent result is compromises on these very issues.

The National Planning Policy Framework (NPPF), which came into effect in March 2012, specifies that planning ought to be sensitive to each area's local character, the provision of green space, and the conservation of historic landscapes and buildings, but its loophole concerning the delivery of housing in particular has been used by developers to challenge objections to designs that might impact these crucial urban amenities.⁵

More specifically, the Framework states that for 'decision taking', the 'golden thread' of 'sustainable development' means that:

- 'development proposals that accord with the development plan' should be approved 'without delay;' and
- 'where the development plan is absent, silent or relevant policies are out-of-date' that permission should be granted 'unless any adverse impacts of so doing would significantly and demonstrably outweigh the benefits when assessed against the policies in [the] Framework' and 'unless material considerations indicate otherwise'.⁶

In other words, the priority under the aegis of the National Planning Policy Framework is on pushing development through, and the reigning presumption in favour of development seriously curtails the power of objections to proposals that violate its otherwise laudable environmental guidelines.



PLANNING WITHOUT PERMISSION?

Residents, councillors and developers: some case studies of development applications along the Arcadian Thames

A number of planning decisions across the Arcadian Thames London boroughs – Kingston, Hounslow, and Richmond – both ongoing and completed, are illuminating in terms of how various planning frameworks are used in allowing or refusing new developments. Large-scale plans in Kingston town centre and Brentford reveal a number of issues and attitudes regarding views and vistas along this special landscape.

Kingston in particular has seen a high volume of new development for the past several years; since 2014 partly under the aegis of Kingston Futures, a scheme to attract developers to regenerate the town centre.⁷

Kingston Riverside

Pre-NPPF developments seem to have set the stage for new plans with building heights that impose more severely on Kingston's views and vistas. In 2008, a 16-storey riverside development (Kingston Riverside) on the site of the old power station was granted permission on appeal by the Secretary of State even though the council had rejected it on the grounds that it did not provide sufficient affordable housing, that its 'height, scale, and massing' were 'out of scale and character', and

would compromise the 'protection of key views'.⁸ Later aspects of the development in June 2012 elicited objections from Richmond over illuminated lighting opposite to a landmark bridge and adjacent to a Grade I historic park, but these were also granted permission.⁹

Kingston's Old Post Office site

Kingston's regeneration has continued to spark opposition. The latest proposals to build on The Old Post Office (TOPO) site have been highly contentious, particularly plans to erect a 19-storey tower block in the town centre.

Kingston Riverside
Photo: redrow.co.uk



The proposed Old Post Office development known as TOPO
Photo: Kingstonweeblyskyline.com



Historic England, the Borough of Richmond and Hampton Court Palace have objected strenuously to the impact such developments would have on views and vistas.¹⁰ Developers cited the previous developments at Kingston Riverside in 2007 as precedent for the height of the current planned tower. Plans for that development were originally refused by the council on grounds very similar to objections now being raised by residents and conservation bodies: lack of affordable housing, ‘harmful’ effects on the ‘character and setting’ of the site, and the height and massing being ‘contrary’ to policy Kingston Core Strategy policy BE1 Strategic Areas of Special Character and the Protection of Key Views.¹¹

Present leader of the Kingston Council Kevin Davis responded to residents’ criticisms of the plans for the TOPO site by citing the housing crisis: ‘We are unbelievably short of housing in London. Do we sit down and sit on our hands? We can’t. Some of the objections being raised are childish’.¹²

The council officers expressed recognition of ‘a significant change in scale between’ the proposed buildings and the adjacent historic environment ‘which cause[s] some harm’, but ‘the detrimental effect of the massing and scale’ is ‘appropriately mitigated’ by its ‘contemporary scheme’ and ‘substantial public benefit’.¹³

However, overwhelming opposition to TOPO plans, backed up by legal opinions from the Kingston Residence Alliance barrister and Historic England as to the harmful effects of the proposed development on ‘heritage assets’, caused the council unanimously to refuse permission on 5 November 2015, against the planning officers’ recommendations. The reasons given were height and design, lack of three-bedroom housing, and the height of the tallest buildings being out of character with the historic market town’s other buildings.¹⁴

Residents were pleased with the decision, but concerned that planning officers failed to ‘accept that there were clear London Plan policy breaches in the proposed scheme’, and that councillors restricted their grounds for refusal to just three issues, without mention of local heritage or affordable housing.¹⁵

Eden Walk

Consultations for Eden Walk, another large-scale development in the town centre with proposals for blocks of flats in towers rising to 20-storeys, have been ongoing, and a planning application is expected imminently.¹⁶

Liberal Councillor Liz Green recently remarked that Kingston’s development plans might provide ‘ample opportunity to engage’ with residents ‘on a real knowledgeable level’, but worried that ‘we are not doing that’.¹⁷

Photo: Kingstonweeblyskyline.com



The proposed redevelopment at Eden Walk

Similarly, in an address to the Conservative party conference on 6 October 2015, Zac Goldsmith (MP for Richmond Park and North Kingston) was deeply concerned that in the push to 'build more', communities were having 'ugly' developments 'dumped' upon them which were 'out of proportion' and 'out of keeping' with the local area.¹⁸

His fellow candidate for Mayor of London, Sadiq Khan (MP for Tooting), has also expressed concern over the '16-storey developments with luxury flats' proposed for Kingston and has emphasised the importance of ensuring 'a good deal for local residents'.¹⁹

Tolworth Tower site

The debate continues in other areas of the borough. Plans to develop the Tolworth Tower site, for example, have been so heated that two councillors were asked to leave a planning meeting on 14 September 2015 'after they spoke against the project'.²⁰

Councillor Richard Hudson found grave faults with current proposals by CNM Estates to create 400 homes on the site, calling attention to the fact that 'the density is well over the London plan'. He worried that 'The recommendation has already come out to approve', and added that he was unsure 'if there is anything that planning officer won't recommend for approval'.²¹

The Mayor's Office, however, agreed that the development did 'not comply with the London Plan' especially owing to its lack of affordable housing and density.²²

Brentford High Street

Brentford's High Street, like Kingston's town centre, has been targeted for regeneration for the past twenty years. The most recent plans, put forth by Ballymore last year, were the subject of intense local debate.²³

Residents felt that the developer's plans were a series of compromises over density and height which led them to object.²⁴



Hounslow Council decided in favour of the development by 12 to 2, because, in the words of one councillor, Brentford was faced with a decision between 'some scheme or none scheme'.²⁵

Residents thought the heights and density of the buildings proposed were problematic enough, and that the 'sterile atmosphere' of the green areas attempting to mitigate these effects were entirely insufficient.

There was a sense that all objections attempting to address the problems with design had 'fallen on deaf ears' and that the 'people feel they hadn't been listened to'.²⁶ The plan in fact 'obliterates the three most historic lanes' leading from the High Street to the river, which was 'an avoidable tragedy'.²⁷

Furthermore, the provision of affordable housing (10-13% throughout the various phases), was seen as particularly poor.²⁸

The planning officer admitted that there would be visual impact on the view from Kew, a World Heritage Site, though he believed it would be screened by the current treescape.²⁹

Kew Gardens had in fact objected to the plan owing to the adverse visual impact in winter when screening trees would be bare.

They were also sceptical of an independent report, used by the planning officer, on the visual impact of the development which failed to take sufficient account of the winter treescape, plans to manage the current screen of trees, and effects from urban lighting.³⁰

The Mayor's Office attempted to allay these fears by pointing to the additional screening effects of Brentford Dock.³¹ The planning officer assured the council that the GLA supported the plan, and that it complied with the NPPF.³²

Responses to his presentation during the decision meeting drew attention to his own reservations, where many points of the plan were 'almost' acceptable or 'not quite' in compliance with guidelines.³³

The overall sense of the decision meeting is that compromise was needed on a number of issues in order to begin the desperately needed rejuvenation of the High Street.

Twickenham Old Sorting Office site, Richmond

Richmond has had fewer development issues than other boroughs along the Thames, but the Twickenham Old Sorting Office site redevelopment is one case.

The council approved a large arts building which impinged on Metropolitan Open Land and which, according to local amenity group Friends of the River Crane Environment, disrupted views along the River Crane conservation corridor.³⁴ The Mayor's Office felt that, although the plan 'did not comply with London Plan Policy', the 'substantial public benefits' it offered to the area 'outweighed' the 'proposed loss of MOL land', and that the lack of affordable housing, in the 'absence of grant funding', was 'reasonable'.³⁵



BETTER DECISIONS FOR SMALLER DEVELOPMENTS?



Surbiton Filter Beds
Photo: friends@seeingwells.org

Although most large developments have been approved or are likely to be, there are examples of smaller developments threatening local views and vistas which have had a more felicitous outcome.

The site of the Surbiton Filter Beds, Kingston, was the subject of a planning application for 64 houses on a floating pontoon, as well as for a large restaurant, and was rejected both initially (2013) and on appeal (2014) for its encroachment on the riverside landscape near Hampton Court Palace, on Metropolitan Open Land, and on the heritage assets, including the Victorian Chelsea Waterworks and coal stores.

The original decision stated that the development would have ‘detrimental impact’ on the area’s ‘visual amenity’ and Metropolitan Open Land.³⁶ The appeal decision again drew attention to the detrimental impact on this ‘open’ area of the river, and found ‘no special circumstances’ to override these concerns.³⁷

A similarly smaller development at **Taggs Boatyard in Elmbridge** was also refused permission on the grounds of its impact on views and vistas.

The planning application called for a detached three-storey building with offices and a boatyard on the ground floor, with eight flats above and another two-storey building with one flat and parking space.

Elmbridge Council determined that such a development ‘would be detrimental to views and vistas along the river’ and that the ‘mass, overall scale, height, and siting would result in a building highly visible and over dominant within the Thames River frontage’.³⁸



Taggs boatyard
Photo: propertylink.estatesgazette.com



CONCLUSIONS

Perhaps the most distressing element of all the case studies under consideration in this report is the constant refrain from local residents that their concerns are not listened to, their suggestions to improve planning designs are ‘ignored’,³⁹ and their voices are simply not being given due credit in planning processes.

The question many residents ask is, to what end is new development if not for the quality of life for both existing and future inhabitants of and visitors to the Arcadian Thames?

Naturally, developers are concerned with profitability, but the consensus amongst residents is that London Mayoral responses and London councils’ decisions now seem to signal less inclination to listen to or act upon objections raised about developments which will affect their communities for many years to come.⁴⁰

In the last three years since the NPPF, even with the advent of so many local community action groups, as well as village and neighbourhood plans, there is a perception that local influence on planning and development is eroding.

And even when policy should be clear, as in views and vistas protection along the Arcadian Thames, practice seems increasingly to be falling far short of explicit planning frameworks, including the NPPF.

In an area with so much to lose in terms of its natural beauty, history, biodiversity, heritage sites and unique character, the loss of local input and overriding of conservation policy threatens to be damaging.

Brentford from Kew Towpath
Tower blocks in Brentford show
the impact of this much older
development on an otherwise
unspoilt view
Photo: TLS website



FOOTNOTES

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Prince Regent's Birthday at Richmond Hill by Turner 1819



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