



Historic England

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Our ref: PL00049085

By email: michelle.b@usefulstudio.co.uk

12th December 2016

Dear Ms Barlow,

Re: St Mary's University Twickenham Masterplan

Further to our meeting on site on 9th November 2016, thank you for the opportunity to provide comments on the Estates Masterplan for St Mary's University. We understand this document is likely to inform a Supplementary Planning Document (SPD) that will be produced by the London Borough of Richmond upon Thames. As the Government's advisor on the historic environment, and a statutory consultee in the context of Strategic Environmental Assessment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is fully taken into account at all stages and levels of the Local Plan process.

Accordingly, we have reviewed this document in the context of the National Planning Policy Framework (NPPF) and its core principle that heritage assets be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations. Having done this, Historic England is pleased to offer the following advice.

Summary

This letter focuses on the highly sensitive Strawberry Hill site, which includes the Grade I listed Strawberry Hill House, Grade I listed Chapel in the Wood, Grade II* registered landscape and Grade II listed College Chapel. Historic England considers the current proposals for this site to be exceedingly ambitious in terms of the amount of new on-site student housing proposed. This means that while the masterplan creates some opportunities to enhance elements of the historic environment it also introduces some threats to its heritage significance, notably to the setting of the registered landscape.

Opportunities to enhance



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During our site visit we explored the Strawberry Hill campus, which appears to have been developed in an ad-hoc manner. The result is an estate of buildings that vary greatly in quality, from exceptionally important listed buildings dating from the mid eighteenth century, to some functional but architecturally uninspired teaching and residential blocks from the mid-late twentieth century. Modern phases of development, with the exception of the 1960s Grade II listed College Chapel, have generally obscured elements of the historic landscape.

Given the aspirations of the masterplan, we would strongly encourage you to explore how lesser quality existing buildings and spaces can be redeveloped, before considering building on open spaces, particularly those that are sensitive. This exercise is likely to be an important part of any convincing justification for planning proposals for new development in the site.

The harm caused by unsympathetic twentieth century alterations is particularly evident with the plaza area between the College Chapel and Waldegrave Road. Dominated by parking and unsympathetic hard landscaping, this space detracts from the significance of the registered park and garden, and the setting of the Grade I listed Chapel in the Woods. As such the masterplan presents an opportunity to research the historic landscape, and through reinstatement or reinterpretation, better reveal its significance and that of the listed structures within it. The illustration on p.115 of the Estates Masterplan which shows this space re-landscaped appears stark and it is unclear how this approach would relate to the historic landscape.

Having looked at the Grade I listed Chapel it might be appropriate for it to be assessed for inclusion on the Heritage at Risk Register. We discussed the need to do a condition survey of this structure, as it appears to be in need of repairs both to the decorative plaster ceilings, and the murals, whose significance would also benefit from further assessment. We would recommend that the University look at addressing any repair work that are identified as a matter of priority, and engage the Council's conservation staff who can advise if this would require listed building consent.

The masterplan also provides an opportunity to better reveal the significance of other historic structures on the site, such as the Old Dairy and the current maintenance department buildings. These are currently obscured by later developments and poor quality alterations, and through sensitive incorporation into your plans could help better tell the story of the development of Strawberry Hill.

Threats to significance

While Historic England welcomes the principles of the masterplan, specifically the protection of heritage, and notes to that end that the masterplan looks to concentrate new



development away from Strawberry Hill House, we have serious concerns about the impact of new student housing blocks on the setting of the registered park and garden. Historic maps illustrate that the area to the south of the registered park and garden, which now contains the running track and sports pitches, has always been open. This open quality is evident from within the designed landscape, particularly in winter when the trees that mark the boundary of the registered park and garden are not in leaf. The potential introduction of five large residential blocks in close proximity to this boundary would have the effect of enclosing the landscape, and is likely to harm the setting.

Paragraph 152 of the NPPF which considers Plan Making, and is therefore relevant when considering site allocations and the potential SPD, notes that “significant adverse impacts on any of these dimensions (economic, social or environmental) should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate.”

Similarly, when considering any planning application for the student housing in the setting of the registered landscape, decision makers will need to give great weight to the conservation of this landscape, including its setting, particularly given the high level of designation. We would therefore encourage you to explore alternative locations for the student housing that is proposed to enclose the registered park and garden, including looking at other sites owned by the University that are less sensitive. Likewise, while we recognise the benefits of providing generous space for students’ accommodation, we would question plans that show this exceeding average sizes at other London institutions where this might result in harm to the historic environment, and strongly encourage you to pursue different options.

As we have previously advised, this campus is also designated as a site of high archaeological significance. As such, should it be subject to redevelopment in future, it would require pre-application assessment by a Registered Archaeological Organisation. This would include an up to date desk-based historic environment assessment with deposit survival modelling which ideally covers both the Strawberry Hill campus & the Teddington campus. This would be supported by a series of impact assessments for each of the application sites as they are submitted through the planning process. The reports would confirm whether further archaeological assessment was required and/or determine an appropriate mitigation strategy.

We are due to start a scoping exercise for the review of London Borough of Richmond upon Thames Archaeological Priority Areas in the early part of 2017. This should provide us with further detail on this specific Archaeological Priority Area, which may be defined as a Tier 1

APA due to the Grade I Strawberry Hill House and the registered park and garden. Further information on those we have already reviewed including a GLAAS Archaeology & Development Risk Model can be found on our website. There is also a Conservation Management Plan for Strawberry Hill, which should provide further information.

The GLHER indicates there has been some archaeological fieldwork undertaken in 2010 within the campus mostly in the south west corner (prior to development here) which revealed cut features interpreted as Roman and/or Medieval ditches and a eighteenth-century ditch thought to be representative of remains of a tree-lined avenue associated with the boundary of Horace Walpole's estate. There has been limited archaeological work on the remainder of the campus site but there is potential. A programme of archaeological fieldwork with historic building recording was undertaken within the estate of Strawberry Hill House in 2014. This should all be on the GLHER now and further detail can be included in the updated assessment. To assist you in integrating archaeology into the SPD we are preparing an archaeological brief which will be provided soon.

Expectations for an SPD

Given the extensive work that has already gone into the masterplan, it seems likely that the SPD will contain some quite detailed proposals which would affect elements of the historic environment that are highly sensitive. It is important that it is developed with a clear understanding of the historic significance of the site and that the heritage values inform the masterplanning as it progresses. It is necessary therefore that the SPD is underpinned by proportionate background evidence. This will relate to the significance of the heritage assets, i.e. fully assessing significance and the contribution that setting, for example, makes to this. In some cases it will also include understanding the condition of the heritage assets. As we set out above there are ample opportunities to redevelop parts of the site in such a way that will enhance the heritage significance of buildings and elements of the landscape, and we would encourage you to draw these out. We would also encourage you to consider how the heritage contained on the campus could be better promoted, as part of a positive strategy for the enjoyment of heritage within the borough.

Finally I must note that this opinion is based on the information provided by you and for the avoidance of doubt does not take precedence over our obligation to advise you on, and potentially object to development proposals which may subsequently arise from this masterplan or any subsequent SPD and which may have adverse effects on the environment.



Historic England

Yours sincerely,


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