

Hanworth Park House



Summary

“The existing House is in very poor condition and is in need of urgent repairs. Although the principle of some enabling development has been accepted, and the Council has resolved to approve conversion of the House to a hotel (along with extensions), it is not considered the current scheme provides significant public benefits that outweighs the harm to the Green Belt and so there are not very special circumstances that justify the amount of development.”

To aid the Area forum and Q&A, we have tried to re-cap on –

- 1 - Existing hotel consent
- 2 – Current position on the current planning application
- 3 – Details of public and community benefits
- 4 – Our response to the Officers’ report
- 5 – West of Borough Plan / Feltham Vision

These are detailed in summary form in the first few pages with a detailed appendix

Existing hotel consent

“whilst the proposals were still contrary to Hounslow’s planning policies for preserving the openness of the green belt, the restoration of the listed building is considered to constitute the very special circumstances that would justify a departure from the Local Plan”.

LBH concluded that the Council has a duty to seek a satisfactory outcome to the listed building being vacant and at risk.



“although the development would result in some harm to the openness of the Green Belt, the benefits of the scheme in terms of the restoration of the historic building and economic regeneration would outweigh this”

“the proposed scheme would restore the house and bring it back into use – that very special circumstances existed to justify the proposal, and the public benefits that arise from restoration of the Listed Building outweigh any harm”.

Current proposal

“work together to restore the house and create the very special circumstances”



“that the case for an enabling development of this scale to provide the very special circumstances necessary to justify a departure from Green Belt policy is considered to be on track”. June 2017 (Brendon Walsh and Shane Baker)

“We are anxious to see the property is sustained and put to viable use, and the building and land preserved as it would be with the original plan.”

“a case can be made to support the proposed development via enabling development. Noting that although harm would be created, the works provide sufficient public benefit to justify and outweigh any perceived harm”

Key Public Benefits

- ✓ **House Restoration** - we have an agreed restoration strategy with LBH Conservation and Historic England to restore the house, where we will apply a full heritage approved approach to the external façade, and community areas (ballroom and 2 adjacent function rooms). Elsewhere in the house, we will seek to apply a modern high quality sympathetic conversion.
- ✓ **Park land restoration** - we have an ecology master plan that will transform more than 10 acres of derelict and inaccessible green belt into high quality amenity park land and garden scape, including the restoration of the Longford River, working with LBH Parks and Environment Trust. The area will be cleaner, safer and significantly more accessible.
- ✓ **Affordable Housing** - We will be providing c 200 new high quality (and affordable) homes for local people in an area where there is an acute housing shortage. We have also offered to also provide up to 100 “social affordable” homes working with a designated HA.
- ✓ **Employment** - We will create hundreds of local jobs in the short term (construction) and across the longer term with the jobs that would be created in and around Hanworth Park. We have also been discussing with LBH to provide up to 50 Youth training / NVQ training places throughout the construction phase, including working with a number of local charities who focus on work place integration.
- ✓ **Community hub** - we will be creating more than 10,000sq ft of publicly accessible community space in and around the house. This space will be made available to local clubs, societies, and businesses with all revenue being re-invested to the house, park, or local charities, working with LBH and Lampton 360 to offer new modern community space. As part of this, we have also offered to build a bespoke community centre in the grounds of the house and provide funding of up to £ 250,000 (over 3yrs) to provide the necessary equipment and infrastructure to help local youth, homeless and food bank causes.
- ✓ **Public interest** – Overwhelmingly in support of the house restoration (99%), with more than 4 times the number of people in support of the restoration even given the proposed development.

Officers' Report

- ✓ **Green belt departure** – Consent already exists to build several large 4 storey pavilions and a large (105 space) car park and coach park. Para 81 of the NPPF states that “local planning authorities should plan positively to enhance the beneficial use of the green belt..., to retain and enhance landscapes, or to improve damaged and derelict land”.
- ✓ **Land sale / state aid** – we have asked LBH to discuss the land sale more than 50 times over the last 3yrs and are still waiting for a meeting date ! We have also asked them for more than a year to articulate what they see as the State Aid issues and are yet to receive a reply.
- ✓ **Inappropriate development on the green belt** – LBH considered (in Nov 2016) that, given the House is still on the “At Risk Register” and “the proposed scheme would restore the house and bring it back into use – that very special circumstances existed to justify the proposal, and the public benefits that arise from restoration of the Listed Building outweigh any harm”. LBH further acknowledged in their summary, that “although the development would result in some harm to the openness of the Green Belt, the benefits of the scheme in terms of the restoration of the historic building and economic regeneration would outweigh this”.
- ✓ **“Urban sprawl” / loss of woodland** –this would be the case for any development on the site. We have offered LBH to re-locate the housing (except one block) in the exact location where the 2, 3 and 4 storey pavilions are currently agreed, or any alternative location that LBH prefer. In terms of open land covered, green belt erosion, and loss of woodland – this is also incorrect and we have discussed this with LBH on numerous occasions. Our revised scheme uses less open land coverage than the existing consent, whilst we create more than 10 acres of new regenerated green belt.

West of Borough plan / Feltham regeneration Masterplan

- ✓ The Leader of Hounslow Council has made repeated reference to the regeneration of Feltham and Hanworth to achieve more sustainable housing growth.
- ✓ There is also continued reference to a review of the green belt and the identification of new sites to meet the growing housing demand in the area.
- ✓ The recently completed Feltham Vision and Concept Masterplan has the regeneration of Hanworth Park House and associated re-vitalisation of the park as its “cornerstone”.
- ✓ Both the current Leader of the Council for Hounslow and the current Mayor of London are on record stating they “want to lead from the front” in helping solve the housing crisis across London by being “creative and innovative” in making better use of existing land assets.
- ✓ LBH is actively seeking to augment its housing supply by taking opportunities via the regeneration of Feltham.
- ✓ LBH would advocate a further growth option that looks strategically at the metropolitan green belt.

Appendix

Hotel Consent

Hotel consent - setting the scene

The principal reason to justify the very special circumstances is the restoration of Hanworth Park House, “***an important heritage asset to Hounslow and the nation***” – LBH Head of Planning in April 2014 and Nov 2016.

Historic England, LBH Conservation Officers and Environment Trust are all fully supportive of the house restoration and the resultant (amended) proposed enabling development to save the house before it is too late.

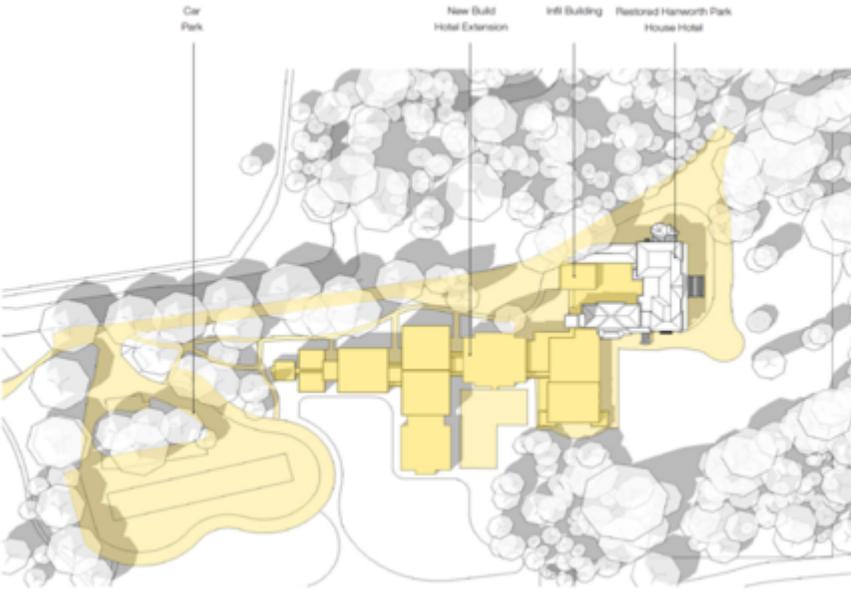
LBH recently stressed the importance under NPPF of finding economically viable uses for listed buildings and that considerable weight should be attached to a financially viable scheme which would rescue the listed building and secure its future.

LBH concluded that “***the case for an enabling development of this scale to provide the very special circumstances necessary to justify a departure from Green Belt policy is considered to be well founded***” (hotel consent Nov 2016).

In January 2014 and Nov 2016, the Planning Committee resolved unanimously to grant planning permission for a 166 bed room hotel and associated car parking and landscaping. The “extensive additions” that were consented include; the construction of five 3 and 4 storey pavilions, connected by 2 and 3 storey link buildings and arranged on the southern side of the access road, a 2 storey glazed atrium to infill the existing courtyard of the main house, a car park for 105 vehicles adjacent to Forest Road, and a coach park to the north of the main house.

This application was recommended for approval by LBH. In their conclusion, it was noted **that “whilst the proposals were still contrary to Hounslow’s planning policies for preserving the openness of the green belt, the restoration of the listed building is considered to constitute the very special circumstances that would justify a departure from the Local Plan”**.

Existing hotel consent



Site Layout Plan of the 2012 Scheme



Overview of the 2012 Scheme

LBH confirmed that the existing hotel consent set precedents for enabling development and development on the green belt

The significant 2, 3, and 4 storey pavilions attached to the main house, along with the associated car and coach parking utilise more development footprint than what is currently proposed

Existing hotel consent vs Our proposals



The principal reason to justify the consent was that **“it was not considered that the proposals would have a significant impact on the setting and character of the listed building”**. Also acknowledged that **“the development was of a very substantial scale”**



Hotel consent planning details

It was acknowledged in both the 2014 and 2016 planning consents that the proposals would depart from the current Green Belt policies. However, LBH considered that, given the House is still on the “At Risk Register” and **“the proposed scheme would restore the house and bring it back into use – that very special circumstances existed to justify the proposal, and the public benefits that arise from restoration of the Listed Building outweigh any harm”**.

LBH further acknowledged in their summary, that **“although the development would result in some harm to the openness of the Green Belt, the benefits of the scheme in terms of the restoration of the historic building and economic regeneration would outweigh this”**.

In terms of the impact on appearance and character of the green belt, it was considered by LBH that **“the design of the extensions would break up the massing and reduce the visual impact, and would be visually associated with the Listed Building”**.

LBH further concluded that, **“because the site is sheltered by surrounding woodland (which “obscures views of the building from most directions”) and additional planting is proposed around the proposed buildings (to the south) – these would help mitigate the loss of open views”**.

Hotel consent planning details

Paragraphs 7.11 to 7.18 of the 2016 planning report detail the view from LBH on the impact on the listed building. Key LBH points –

- ✓ The recognition that the development is of a very substantial scale
- ✓ The fact that sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 require LPA's to have special regard to the desirability of preserving a listed building or its setting.
- ✓ The NPPF stresses the need to identify economically viable uses for listed buildings.
- ✓ The importance of HPH lies mainly in its architecture (mainly external)
- ✓ The design philosophy forms the basis in justifying how an extension almost twice as large as the existing buildings, would be in keeping with the character, scale. Specifically, the location to the west of the existing house is a key part of the justification, bringing development away from the parts of the building with the most architectural and historic interest.
- ✓ That the view of Historic England are important in the consideration of the effects of the scheme on the listed building.

It concluded that the Council has a duty to seek a satisfactory outcome to the listed building being vacant and at risk.

Current Proposal

The “shifting sands” of LBH Development Management ..

August 2017 – Shane Baker LBH

“Having considered the merits of this application with colleagues, including the possible revisions, I am recommending refusal as the harmful effects of the scheme are not outweighed by public benefits of the proposal and so there are not very special circumstances to justify a departure from the Development Plan”

June 2017 – Brendon Walsh & Shane Baker LBH

“Agreement to focus collective efforts to revise current proposals to a point where LBH can support the very special circumstances to justify deviating from existing planning policy. Specific focus on resolving outstanding queries from Historic England and LBH Conservation as previously highlighted as the principle outstanding issues preventing LBH support, and paring back development to site of existing hotel consent”

April 2017 – Shane Baker LBH

“Enabling housing is inappropriate development in the green belt, and would only be acceptable if very special circumstances, in this case the repair / restoration of the listed building and bringing community use were satisfactory. At present the enabling argument is not justified given comments from HE and LBH Conservation Officer”

Current situation

Hanworth Park House has been left to rot and decay for more than 25yrs and now stands close to becoming completely derelict. A brief tour will highlight its current parlous condition.

The location, house and grounds have an almost unique history dating back to the 1500's with links to both Henry VII and Henry VIII. The current house and surrounding grounds sit as a focal point within the aeronautical and motor industries over the last 100 years. There are simply too many iconic names and historical events attached to the house to name – it is without doubt, one of the most significant properties in London, historically and architecturally. Historic England are massively supportive of its restoration, as are LBH Conservation Officers and Environment Trust

The previous owner spent more than 15yrs to arrive at a scheme which was completely unviable and un-achievable – during which time he let the house fall significantly further into disrepair.

Since owning the property from 2014, we have undertaken extensive emergency repair works and security measures to keep the house safe and secure.

LBH have always maintained that they wish to see the house restored, but flatly refuse to agree anything to achieve this, and believe that “the public benefits of saving the house do not outweigh the harm to the green belt”



Current planning application details

The current application does not comply with the London Plan. However –

- ✓ the change of use is supported in principle by the GLA and LBH.
- ✓ GLA confirmed that the proposal constitutes inappropriate development on MOL. However, taking into account the previous permission and the need to restore and preserve Hanworth Park House, the ‘very special circumstances’ put forward to justify the harm to the MOL are likely to be acceptable, as was the case for the previous hotel consent.

LBH noted that, in considering whether to grant planning permission for a development that affects a listed building or its setting, the authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses

The National Planning Policy Framework states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. However, of the five purposes it serves, one of them is to assist in urban regeneration by encouraging the recycling of derelict and other urban land.

The NPPF also stresses the importance of finding economically viable uses for listed buildings, and that considerable weight should be attached to a financially viable scheme which would rescue the listed building and secure its future.

LBH affirmed ***“that the case for an enabling development of this scale to provide the very special circumstances necessary to justify a departure from Green Belt policy is considered to be on track”***.
June 2017 (Brendon Walsh and Shane Baker).

Current planning application chronology

March 2015: Principle of enabling development and “very special circumstances” confirmed by LBH by virtue of approved hotel consent, with Historic England confirming their position as “very supportive” for the restoration of HPH to occur.

June 2015: LBH stated in their pre-app response that **“development and restoration of HPH supported (as long as public benefits outweigh planning policy breaches)”**. Principle of residential use confirmed by LBH as preferable over hotel use.

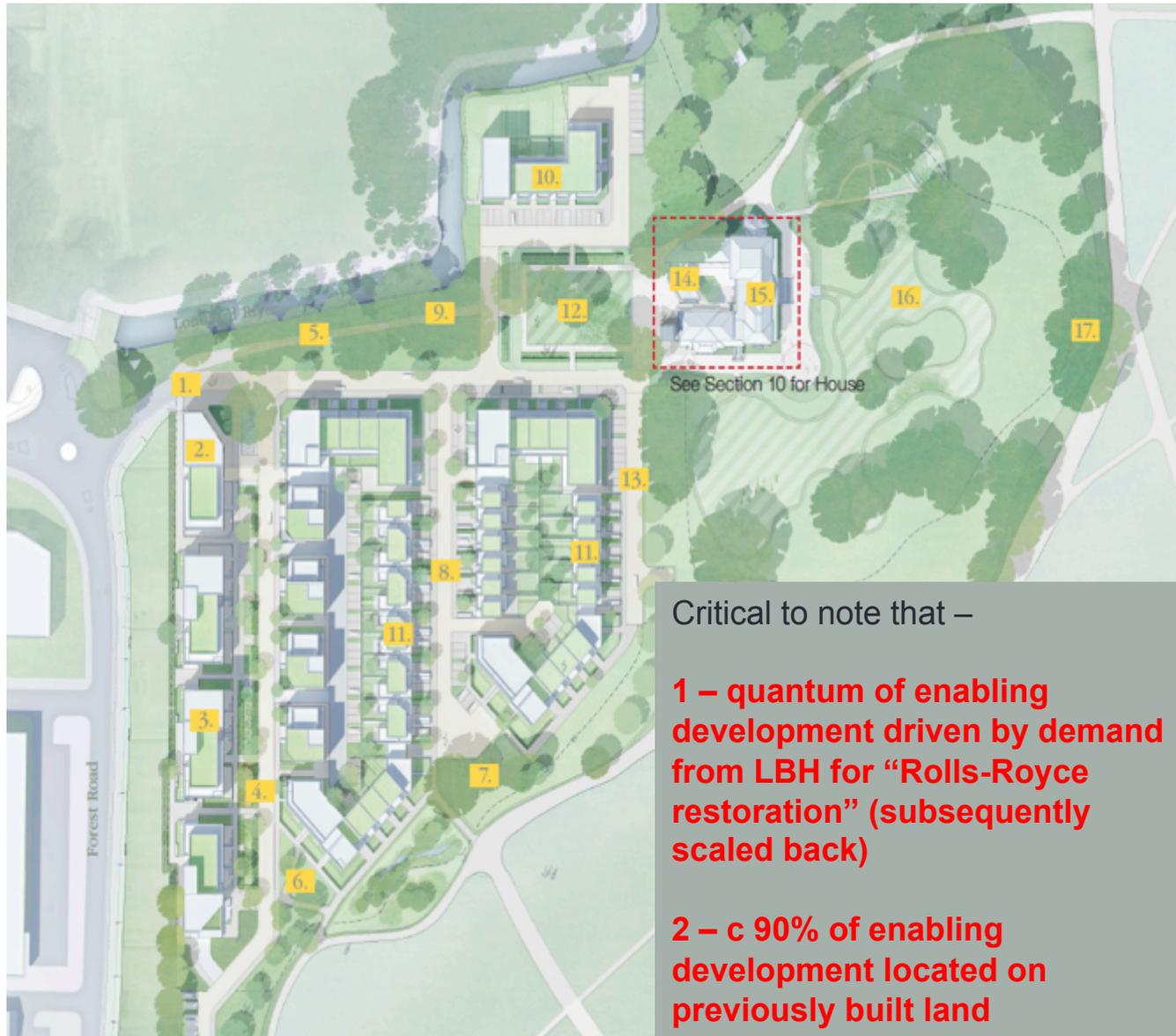
June 2015: The conclusion in June 2015 was that “the proposed development would currently not be considered acceptable, and that LBH were keen to work with us and HE to change this view”. LBH proposed entering into a PPA to **“work together to restore the house and create the very special circumstances”**

August 2015: Confirmation from LBH that they **“want to work to see the listed building restored and thus agree the minimum amount of development necessary for this”**. However, LBH requested that the restoration be conservation and restoration led (ie the most expensive form)...

November 2015 onward: Confirmation that post the meeting to discuss viability and repair costs and strategy – that **“we are moving in the right direction”**

November 2015 onward : Confirmation from HE that in their view, **“a case can be made to support the proposed development via enabling development. Noting that although harm would be created, the works provide sufficient public benefit to justify and outweigh any perceived harm”**. LBH officers agreed with this position.

Originally submitted scheme



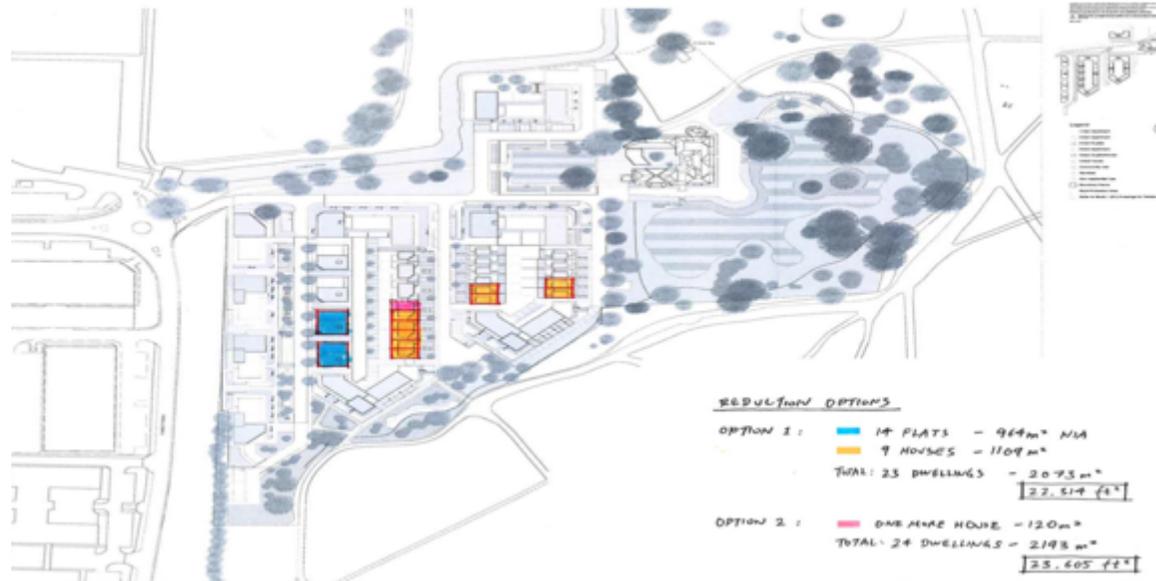
The proposed scheme includes a range of key moves and defining features to create its own identity. These include;

- + 1. Realigned avenue to create a new approach to Hanworth Park House and enhance views of the Clock Tower
- + 2. Six storey marker building at entrance of the site
- + 3. Four - Five storey apartment buildings
- + 4. Linear Park
- + 5. Retaining existing trees and improve the edge to the river
- + 6. Providing a public amenity area's
- + 7. Providing a Community Orchard
- + 8. Tree-lined residential street's
- + 9. Retaining existing access path and resurface to create a pedestrian path
- + 10. Creation of Permeable apartment buildings facing the garden square
- + 11. Two - Three storey family houses
- + 12. A New garden square in front of entrance
- + 13. Permeable surface to street
- + 14. Infill building to create a new entrance
- + 15. Existing Hanworth Park House
- + 16. Formal garden to the front of the house
- + 17. Existing mature trees

Originally submitted scheme



Revisions to originally submitted scheme “Option 1”

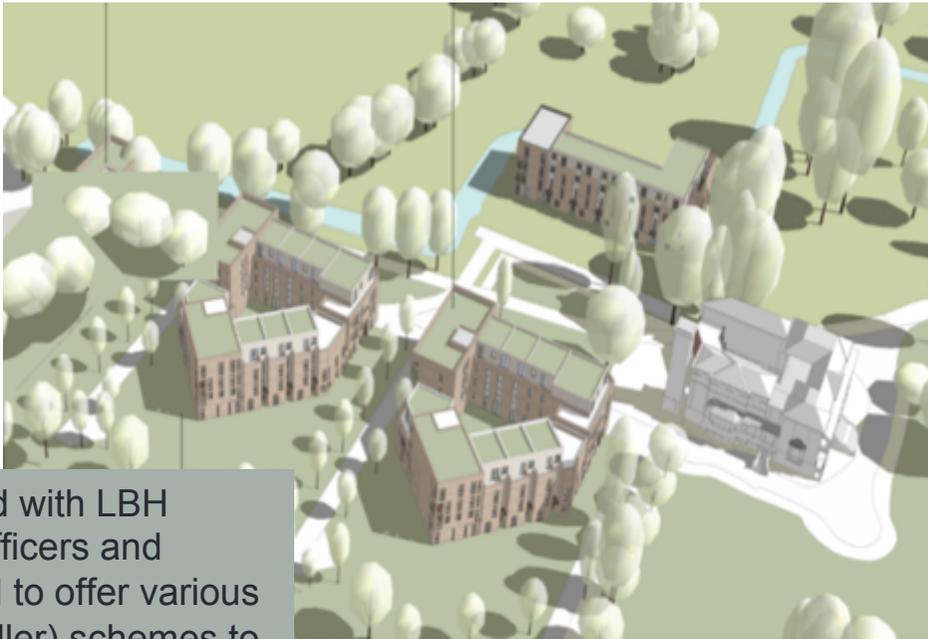


Reduction in footprint requested by LBH to “de-risk” planning decision by having footprint similar to existing hotel consent.

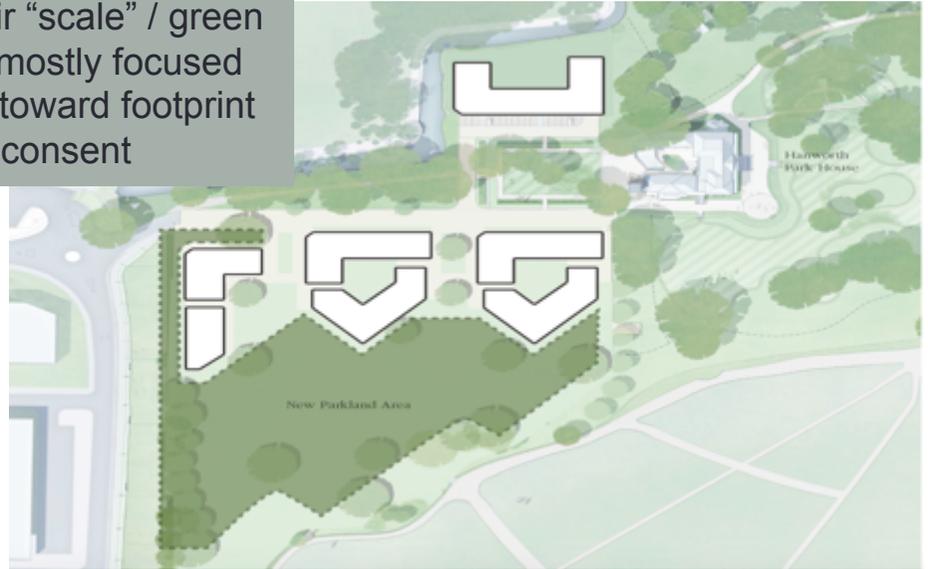
Reduction in footprint mainly due to cost reductions in main house (conversion in residential space over restoration) to yield fewer houses



Revisions offered to LBH to resolve “scale” concerns



We have worked with LBH Conservation Officers and Historic England to offer various alternative (smaller) schemes to LBH to allay their “scale” / green belt concerns – mostly focused on scaling back toward footprint of existing hotel consent



Key Public Benefits

Current application - key public benefits (restoration)

- ✓ Most importantly, the sympathetic and conservation led restoration of an iconic house that has sat empty and been in decline for 25yrs.
- ✓ We have an agreed restoration strategy with LBH Conservation and Historic England to restore the house, where we will apply a full heritage approved approach to the external façade, and community areas (ballroom and 2 adjacent function rooms). Elsewhere in the house, we will seek to apply a modern high quality sympathetic conversion.
- ✓ Outside of the house, **we have an ecology master plan that will create more than 10 acres of high quality amenity park land and garden scape, including the restoration of the Longford River, working with LBH Parks and Environment Trust.** The area will be cleaner, safer and significantly more accessible than it is today.
- ✓ Environment Trust, who are very supportive of the project, are also in the process of seeking funding for this project from LBH and the GLA, which AGC will seek to match to an agreed amount. Environment Trust have also indicated that they would wish to run the Community Interest Company to administer and control the community use of the house and grounds.

Current application - key public benefits (homes)

- ✓ We will be providing c 200 new high quality (and affordable) homes for local people in an area where there is an acute housing shortage.
- ✓ More than 60% are expected to cost between £ 225,000 and £ 325,000, with more than 90% below £ 500,000, so we believe to be excellent value and well within the definition of “affordable”
- ✓ We have sought to provide a balanced mix of houses and apartments from 1 bed to 4 bedroom. Unfortunately, LBH have guided the overall development to be more compact (ie less houses).
- ✓ The Local Plan makes very clear the need for “step change” solutions and to make better use of Brownfield areas. More than 90% of the development area was previously built on, much of which still has the remains of the foundations left over from the large aircraft hangars.
- ✓ We have the ability to provide dedicated units for step free access and “retirement like” living
- ✓ We have also offered to also provide up to 100 “social affordable” homes working with a designated HA – but this has been declined by LBH thus far.

Current application - key public benefits (local economy)

- ✓ The re-development of Hanworth Park House is a c £ 70m direct investment into the local economy, and a key part of the broader regeneration of Feltham and Hanworth.
- ✓ It will create hundreds of local jobs in the short term (construction) and across the longer term via the boost to the local shops and restaurants, and of course with the jobs that would be created in and around Hanworth Park.
- ✓ We have been discussing with LBH to provide up to 50 Youth training / NVQ training places throughout the construction phase, including working with a number of local charities who focus on work place integration.
- ✓ The Community Interest Levy and land proceeds for this project are more than £ 2m – which we hope will provide local improvements in infrastructure and resources given the traffic and population increase.

Current application - key public benefits (community benefits)

- ✓ We will be creating more than 10,000sq ft of publicly accessible community space in and around the house. This space will be made available to local clubs, societies, and businesses with all revenue being re-invested to the house, park, or local charities. We are already working with Lampton 360 / LBH, who said...

"The scheme at Hanworth Park House proposes to accommodate significant amount of new community access floorspace within the main house once refurbished.

I consider that the spaces proposed within the refurbished House will help to accommodate a number and range of local - and possibly wider borough – groups /organisations who I know are desperate for good quality space.

The timing of the proposals is also ideal insofar as the 'community review' being undertaken by Corporate Property who are proposing to consolidate/rationalise those assets that are no longer fit for purpose, through the potential closure of some of the lesser used facilities in this part of the Borough, in order to create a smaller, but more effective group of community facilities, in modern, updated facilities.

The proposed refurbishment of the iconic Hanworth Park House has the potential to become a new community hub, especially, further supported through the links to the adjacent public Hanworth Park."

Current application - key public benefits (community benefits)

- ✓ **We will be creating more than 10 acres of new green belt which will all be open and publicly accessible.** This area will include an amenity garden and recreation area suitable for picnics, recreation, and leisure. We will be working with Environment Trust and LBH Parks on the design, construction, and maintenance. We anticipate that the revenue generated from the house will be sufficient to provide park rangers and ensure the area is safer, cleaner and more vibrant.

- ✓ The public interest feedback highlighted the need for –
 - publicly accessible community space - we have made provision for the use of the ballroom and adjacent room as function rooms (both fully restored) to include a museum to reflect the depth of local history - Environment Trust have indicated an interest to lead this, and how this can include local interest groups and schools to provide a long term sustainable project to reflect the Feltham and Hanworth history.
 - an on-site café such that the house and park are more of a destination – we are suggesting the main reception area of the house and the adjacent south eastern room and terrace area.
 - Parking and amenity / play areas – we have factored in both into the landscaping.

- ✓ ***We have also offered to build a bespoke community centre in the grounds of the house and provide funding of up to £ 250,000 (over 3yrs) to provide the necessary equipment and infrastructure to help local youth, homeless and foodbank causes.***

Current application - key public benefits (public interest)

The restoration of Hanworth Park House has attracted significant local interest and support from many local and quasi-governmental interest groups and charities.



29th August 2017

Dear Sir or Madam:

HANWORTH PARK HOUSE

I am writing to offer the Environment Trust's full support for the restoration of Hanworth Park House.

The Trust is a heritage and nature conservation charity that has been operating for over 30 years in the local area. We believe it is vital that this Grade II listed building, steeped in history, is saved. It needs urgent restoration work now before it collapses or is destroyed by vandals.

The Environment Trust is keen to get involved. The proposed plans present us with a variety of ways to work closely with Gary Cottle to further benefit the local community, both in the house and in the park landscape.

We have met with many of the local groups in the area and there appears to be unanimous enthusiastic support for the project.

Yours faithfully


Bernice Simcox

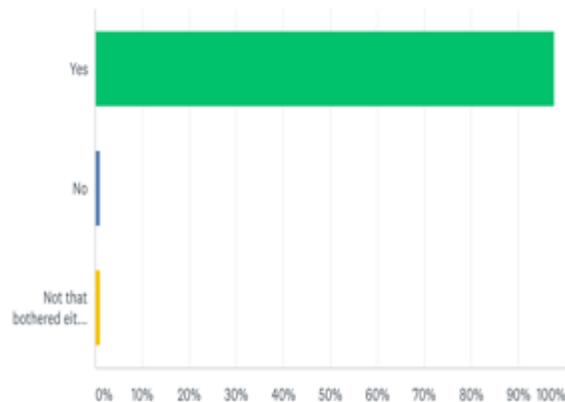
Current application - key public benefits (public interest)

Q3

Customize Export

Would you like to see Hanworth Park House restored ?

Answered: 89 Skipped: 0



We have now undertaken two surveys that have been distributed to more than 5,000 local residents. These surveys highlighted 3 key things –

1 – Support to restore the house is close to 100% of the respondents

2 – More than 5 times the number of people still supported the restoration given the proposed housing.

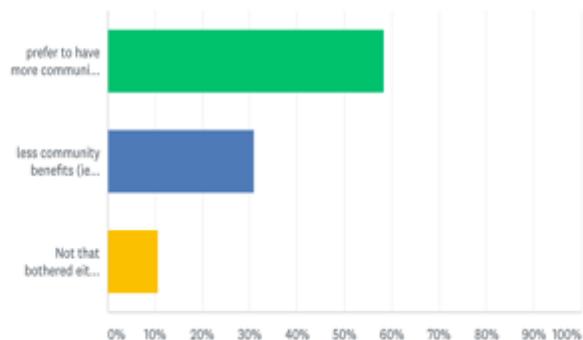
3 – More than 4 times the number of people wanted more housing / community benefits.

Q5

Customize Export

In terms of the trade off between the level of restoration costs and the housing required to pay for it - would you ...

Answered: 84 Skipped: 5

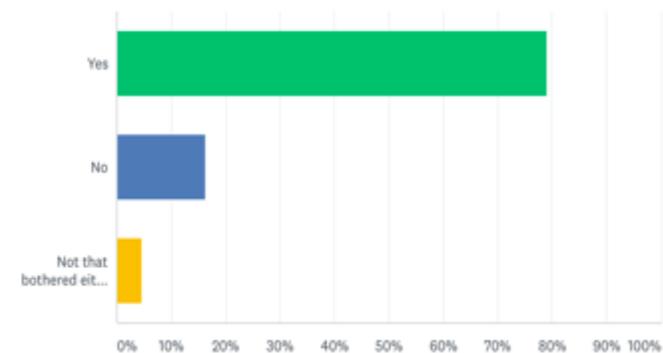


Q4

Customize Export

If the impact of restoring Hanworth Park House is having more homes built - is this worthwhile ?

Answered: 86 Skipped: 3



Officers' Report

Officer's report

“The proposal is a departure from the Council's Local Plan, as housing is proposed in the Green Belt”

- ✓ This was the same for the previous hotel consents.
- ✓ Para 80 of the NPPF - one of the core objectives of the green belt “is to assist in urban regeneration, by encouraging the recycling of derelict and other land”
- ✓ Para 81 of the NPPF states that “local planning authorities should plan positively to enhance the beneficial use of the green belt..., to retain and enhance landscapes, or to improve damaged and derelict land”. **This in essence is what the West Borough Plan and the Feltham Vision and Spatial Plan outline as their imperatives. Up to 10 new acres of public space will be created in this instance.**
- ✓ **Para 89** – “a local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are: limited infilling or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development” – **the vast majority of the proposed site (>90%) is either brownfield, private or inaccessible which should add further weight to this directive.**

Green Belt, character and scale ..

These have always been the crucial issues. We have discussed this issue with LBH on numerous occasions with specific agreement to focus our collective efforts to revise the consented proposals to a point where LBH can support the “very special circumstances” to justify deviating from existing planning policy for the residential scheme. We were told in June 2017 that we were “on track”, after agreeing various restoration reduction with HE and LBH to reduce the application footprint back toward that of the hotel consent.

Perversely “the design philosophy submitted with the hotel application formed the basis for justifying how an extension almost twice as large as the existing building, would be in keeping with the character, scale and appearance of the existing house” (LBH, hotel consent, Nov 2016), and our guidance from LBH was to amend our scheme

The location of the extension to the west of the existing house is a key part of the justification, and is considered a preferable location for enabling development than the southern extension featured in the previously approved scheme for an 84 bedroom hotel. This would bring development away from the parts of the building with of the most architectural and historic interest and provides the opportunity to restore the important southern elevations of the house. In particular this would include the original south-east main front elevation.” (hotel consent, Nov 2016)

LBH also concluded in their recommendation of the hotel scheme that, **“whilst there would be some loss of openness, the impact on the Green Belt is relatively modest and an observer would be unlikely to interpret it as an example of ‘urban sprawl’; the prevention of which is the key purposes of the Green Belt”**. This argument was further augmented by their view that the site was not particularly urban in its nature - “the application site is remote from the nearest residential property”.

LBH also asserted that **“given the size of Hanworth Park in relation to the development, it is not considered that there would be a significant effect on the enjoyment that park users currently gain from the space“**.

Officer's report

“The proposal seeks to convert the Grade II listed building (Hanworth Park House) into flats with this conversion and its restoration to be funded by building on the Council owned parkland that adjoins the House (enabling development). No sale of the land has occurred and any such transaction raises EU State Aid issues that need to be accounted for. Additionally the site is subject to a restrictive covenant that would also need to be removed (at the applicant's cost).”

- ✓ Since purchasing the property in 2014, we have asked LBH to progress the sale of the land (relating to the hotel consent) on more than 50 occasions – still waiting for a meeting ! We have offered to undertake a land swap or release the c 7 acres of AGC land as part of the enabling development public benefits.
- ✓ We have had two city law firms review the potential state aid issues that have been raised. Both dismissed the issue. We have asked LBH DM on numerous occasions to elaborate on what they see as the issue, but are yet to receive a reply.
- ✓ The restrictive covenant has been confirmed to be easily removed as SEGRO had a number of these outstanding locally, dating back some 30yrs.

Officer's report

“The proposed housing is inappropriate development in the Green Belt and it would only be justified if there were very special circumstances that outweighed its harmful effects. In this case the applicant argues restoration of the listed House is of significant public benefit . In addition to this the scheme would realign the access road from Forest Road providing an enhanced approached to the House and the overall scheme will better connect the House to the adjoining parkland.”

- ✓ LBH considered (in Nov 2016) that, given the House is still on the “At Risk Register” and **“the proposed scheme would restore the house and bring it back into use – that very special circumstances existed to justify the proposal, and the public benefits that arise from restoration of the Listed Building outweigh any harm”**.
- ✓ LBH further acknowledged in their summary, **that “although the development would result in some harm to the openness of the Green Belt, the benefits of the scheme in terms of the restoration of the historic building and economic regeneration would outweigh this”**.
- ✓ The full details of public benefits associated with this application are detailed separately

Officer's report

“The proposed housing is comprised of over 200 houses, in blocks of up to 6-storeys in the Green Belt. Officers consider this would result in undue urban sprawl into the Green Belt, with the extent of open land covered, the urban character of the housing and its siting all significantly eroding the openness of the Green Belt and also would result in the loss of 1.7ha of existing woodland”.

- ✓ One block had 6 storeys in the original submission. We subsequently agreed with LBH and LBH Conservation that 4 storeys as a maximum height still allowed for the entire development to be screened from all meaningful directions.
- ✓ In terms of urban sprawl, this would be the case for any development on the site. Although we were originally asked by LBH to locate housing toward Forest Road and away from the House, we have offered LBH to re-locate the housing (except one block) in the exact location where the 2, 3 and 4 storey pavilions are currently agreed, or any alternative location that LBH designate.
- ✓ In terms of open land covered, green belt erosion, and loss of woodland – this is also incorrect and we have discussed this with LBH on numerous occasions. Our revised scheme uses less open land coverage than the existing consent, whilst we create more than 10 acres of new regenerated green belt.

Conclusion

“The existing House is in very poor condition and is in need of urgent repairs. Although the principle of some enabling development has been accepted, and the Council has resolved to approve conversion of the House to a hotel (along with extensions), it is not considered the current scheme provides significant public benefits that outweighs the harm to the Green Belt and so there are not very special circumstances that justify the amount of development. To minimise the cost of the restoration (and the amount of enabling housing) the applicant is now proposing to carry out the restoration using elements of contemporary construction techniques and materials, and would make only one room available to the public, compared to earlier proposals that offered a series of rooms for hire and specialist like for like sympathetic restoration of the fabric of the building. This diminishes the public benefit of restoring the House.”

- ✓ We have detailed the public benefits elsewhere in this document. These are very significantly beyond what were proposed in the previous consent (on which the costs were incorrect by some some several million pounds), and were crafted after consultation with local residents and LBH.
- ✓ We have offered up to 10,000 sq ft of public and community space in and around the house for local clubs (with Lampton 360 and LBH), businesses and societies to make use of – so the statement around one room being available is incorrect.

Conclusion

“In any event the blocks shown in possible revisions are of an urban character and scale and still occupy large areas of Green Belt”.

- ✓ By their very nature, they are of an urban nature, as are the hotel pavilions, or in fact, any development. As we discussed and agreed with LBH, we have revised the site coverage (removing houses unfortunately) such that the coverage area of the green belt is less than that of the hotel, with the added benefit of c 10 acres of green belt being restored

“No affordable housing is proposed as this would add further cost, and in turn require more housing.”

A number of suitable alternative locations were suggested by LBH Conservation for housing that did not impinge on the heritage value of the house. We offered to build up to 50% (100 additional houses) as part of the enabling development should LBH agree a land swap or land sale.

Conclusion

“TfL has raised concerns about the amount of car parking and impacts from additional traffic generation on nearby roads, and has requested further traffic modelling.”

- ✓ We agreed with TfL to update the car parking and traffic management report once we had completed the site revisions.

“The current owner is obliged to maintain the building in good condition. The owner has provided security and made the building watertight, but the building continues to deteriorate and is on Historic England’s buildings at risk register”.

I would highly recommend a visit to the house – it is both grand and iconic, but at the same time, edging toward collapse. As is very evident, we have significantly increased security over the last few months having had a number of break-ins and attempted arson attacks. I would very much like to find a solution that LBH will support before the house falls down or is burnt down.