



Heritage Statement

The Boathouse
Ranelagh Drive
Twickenham
TW1 1QZ

June 2023 | Project Ref 02758B



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1. Introduction

1.1 This Heritage Statement has been prepared by HCUK Group on behalf of The Boathouse Twickenham Limited in respect to proposals for The Boathouse at Ranelagh Drive Twickenham, TW1 1QZ, hereafter referred to as the Site (**Figures 1 & 2**). This scheme includes the demolition of the existing building (consisting of three residential units and was formally a recording studio) to be replaced by a terrace of three townhouses with improved public realm and associated private amenity space and landscaping. The determining authority for the application is the London Borough of Richmond upon Thames (LBRUT).

1.2 The Site lies wholly within the St Margaret’s Estate Conservation Area (**Figure 4**), as well as Metropolitan Open Land (MOL), and is adjacent to the Royal Botanic Gardens World Heritage Site buffer zone. Across the River Thames to the east is the Royal Botanic Gardens Registered Park and Garden (grade I) covering Kew Gardens. To the south-east is the grade II* listed Richmond Footbridge, lock and sluices. Richmond Council has published two studies for the conservation area which have informed the preparation of this report.



Figure 1: Site location map with designated heritage assets shown (blue triangles denote listed buildings and green hatching indicates a registered park and garden. The brown hatching is the Royal Botanic Gardens Kew World Heritage Site buffer zone). Source: Historic England



Figure 2: Site plan as existing



Figure 3: The Site viewed from the Richmond Footbridge to the east



Figure 4: St Margaret's Estate Conservation Area Map. The Site is outlined in red. Source: LBRUT

Background to the application

- 1.3** The proposals have been subject to pre-application consultation with LBRUT¹ regarding a new development for flats and this application follows a scheme which was withdrawn in December 2022 (ref: 22/3017/FUL) owing to concerns relating to heritage impact.
- 1.4** Following the withdrawal of the application, the applicant engaged Historic England separately on a pre-application basis and received feedback on an amended

¹ Ref: 20/P0166/PREAPP

proposal which Historic England accepted was less harmful than the withdrawn scheme but would be likely to result in some less than substantial harm. On the basis of the feedback received the current proposal presented and assessed in this report has been further reduced in size and scale with other amendments made in light of comments received and discussions with Historic England which took place on site in January 2023. The amendments to the scheme for three townhouses are summarised at the beginning of Section 5.

- 1.5** The pre-application letter received on 21st August 2020 from LBRUT in respect to the flatted development establishes some initial points of principle, and these are acknowledged and addressed within this report. First among them is the Council's position on the loss of the existing building;

"there is no objection to the replacement of the existing 1960s building, which is not of any particular quality, however it fits into the tree line and setting in riverside views in terms of height and scale, also being within the MOL, and this gives an indication of the appropriate scale for a replacement."

- 1.6** The initial pre-application scheme was considerably larger than the current proposal, and the amended design has taken heed of the guidance provided in the Council's pre-application guidance and also that of Historic England.

Heritage Context

- 1.7** The existing building replaced a boat builders and repair workshop (Dick Waite's Boathouse) in the late 1960s. It was purchased and adapted for use as a private recording studio by Pete Townsend of The Who in 1976. The building has been substantially altered over the years and has been in residential use for decades with three residential units within the property.
- 1.8** Today The Boathouse is in a poor condition, both internally and externally. Its inherent poor-quality design, rudimentary construction and current state of repair is considered to detract from the conservation area and the nearby listed Richmond Footbridge, Lock and Sluices (grade II*).
- 1.9** The building also negatively impacts the riverside setting, particularly the environment of the riverside walk which runs directly in front of the Site. This is very enclosed and is not an attractive walkway. With the building in such a poor,

dilapidated state, the applicant has developed proposals for a replacement residential scheme that will better reflect the Site's surroundings and vastly improve this section of the riverside walk.

Heritage Assets

1.10 Designated heritage assets with the potential to be affected by the proposed development comprise the St Margaret's Conservation Area in which the Site is located (**Figure 4**), The Richmond Footbridge, Lock and Sluices (**Figure 5**) and the Royal Botanic Gardens Kew World Heritage Site / RPG. In respect to the latter two assets, the proposed development would result in some change within their settings. As such this change is assessed in line with Historic England guidance contained in GPA 3 with reference to the table at **Appendix 2**. The Gordon House Maria Grey Training College to the northwest (grade II*) was assessed at pre-application stage by HCUK and is not considered to have the potential to be affected by the development proposals and thus has been scoped out from any further assessment.



Figure 5: The Richmond Footbridge and Lock (grade II) viewed from the southeast. The Boathouse is visible in the distance through the second arch span in from the right.*

1.11 Accordingly, this Heritage Statement includes an assessment of the significance of St Margaret's Conservation Area, Richmond Footbridge and the Royal Botanic

Gardens at Kew, the Site's contribution to their significance and the likely impact of the Proposed Development on this.

Purpose of the assessment

- 1.12** The purpose of this document is to assist the decision maker on the matter of the effects of the proposed development upon the historic built environment and to gauge its suitability in heritage terms. Value judgements on the significance of the heritage assets affected are presented and the effects of the proposals upon that significance are appraised in compliance with paragraph 194 of the National Planning Policy Framework (2021). It also assesses the capability of these assets to absorb change and whether the proposal complies with the guidance and policy of the NPPF and local planning policy and guidance.
- 1.13** The report does not address the planning balance in relation to the weighing of public benefits of the proposal against potential harm, if any, to heritage significance.
- 1.14** This report does not provide an archaeological assessment of below ground potential. The Historic Environment Record has been consulted via the Heritage Gateway website and other online datasets and resources have provided background information on the site and surrounding assets, they are referenced within the following text where relevant.

Key Considerations

- 1.15** The key heritage considerations are whether the proposals would preserve, enhance or harm the significance of affected heritage assets. The preparation of this report was supported by desk-based research in addition to a Site visits and walkover of the surroundings undertaken in good conditions in between June 2022 and January 2023.
- 1.16** This Heritage Statement should be read in conjunction with the full drawn submission and the Design and Access Statement prepared by Silver Jetty Architecture.

2. Relevant Planning Policy Framework

Legislation and National Planning Policy

- 2.1** Section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 requires the decision maker to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses, when exercising planning functions. The decision maker must give considerable importance and weight to the desirability of preserving the significance of the listed building, and there is a strong presumption against the grant of permission for development that would harm its heritage significance.² The presumption will plainly be lessened if the harm is less than substantial within the meaning in the National Planning Policy Framework (NPPF) as is explained further below.
- 2.2** There is a broadly similar duty arising from section 72(1) of the Act in respect of planning decisions relating to development within conservation areas. The meaning and effect of these duties have been considered by the courts in cases since the legislation came into effect, including the Court of Appeal decision in relation to *South Oxfordshire DC v SSE & J Donaldson* (March 1991, CO/1440/89). The Court found that section 72 requires attention to be directed to the effect on the conservation area as a whole rather than on particular parts of it.³
- 2.3** In the present instance, the Site falls wholly within the St Margaret's Conservation Area. As such the duty under Section 72(1) is engaged.

² *Barnwell Manor Wind Energy Limited v East Northamptonshire District Council and others* [2014] EWCA Civ 137.

³ See also *Kverndal v. London Borough of Hounslow* [2015] EWHC 3084 (Admin), wherein Supperstone J. accepted the submission that section 72 did not amount to "a duty to maximise the enhancement of the conservation area" (para. 84) and that "a failure to take a better option is not a breach" (see paragraphs 83, 84, 86, 89 & 90 of the Judgment). In other words, if the net overall effect is beneficial or neutral, then it is illegitimate for the LPA to take the approach that there are elements which when viewed in isolation are not "good enough". The question is whether the sum total of what would be there afterwards is equal to or better than the sum total of what is there now.

2.4 For the purposes of this statement, preservation equates to an absence of harm.⁴ Harm is defined in paragraph 84 of Historic England’s Conservation Principles as change which erodes the significance of a heritage asset.⁵

2.5 The significance of a heritage asset is defined in the National Planning Policy Framework (NPPF – July 2021) as being made up of four main constituents: architectural, historical, archaeological and artistic interest. The assessments of heritage significance and impact are normally made with primary reference to the four main elements of significance identified in the NPPF.

2.6 Paragraph 197 of the NPPF underlines the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation,⁶ and reiterates the well-established concept that new development can make a positive contribution to local character and distinctiveness.

2.7 Paragraph 195 indicates that harm should be avoided or minimised and that which remains requires clear and convincing justification (Paragraph 200).

2.8 The setting of a heritage asset can contribute to its significance. Setting is defined in the NPPF as follows:

“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.”

2.9 The NPPF requires the impact on the significance of designated heritage assets⁷ to be considered in terms of either “substantial harm” or “less than substantial harm” as described within paragraphs 201 and 202 of that document. National Planning Practice Guidance (NPPG) makes it clear that substantial harm is a high test, and case law describes substantial harm in terms of an effect that would vitiate or drain

⁴ South Lakeland v SSE [1992] 2 AC 141.

⁵ Conservation Principles, 2008, paragraph 84. Heritage Asset is defined by the NPPF (Annex 2) as a: ‘building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest’. This includes both designated and non-designated heritage assets.

⁶ *Conservation* (for heritage policy) is defined in Annex 2 of the NPPF as: “The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.”

⁷ The seven categories of designated heritage assets are World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Park and Gardens, Registered Battlefield and Conservation Areas, designated under the relevant legislation.

away much of the significance of a heritage asset.⁸ The Scale of Harm is tabulated at **Appendix 1**.

2.10 Paragraphs 201 and 202 of the NPPF refer to two different balancing exercises in which harm to significance, if any, is to be balanced with public benefit.⁹ Paragraph 18a-020-20190723 of National Planning Practice Guidance (NPPG) online makes it clear that some heritage-specific benefits can be public benefits. Paragraph 18a-018-20190723 of the same NPPG makes it clear that it is important to be explicit about the category of harm (that is, whether paragraph 201 or 202 of the NPPF applies, if at all), and the extent of harm, when dealing with decisions affecting designated heritage assets, as follows:

"Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated."

2.11 Paragraphs 199 and 200 of the NPPF state that great weight should be given to the conservation of a designated heritage asset when considering applications that affect its significance, irrespective of how substantial or otherwise that harm might be.

2.12 Paragraph 203 of the NPPF refers to the approach to be taken towards non-designated heritage assets as follows:

"The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."

2.13 Paragraph 203 of the NPPF is unlikely to be relevant to this assessment since no NDHA's have been identified within the vicinity of the Site, and the existing building is not an NDHA.

2.14 Paragraph 206 of the NPPF states that local planning authorities should look for opportunities for new development within Conservation areas, and within the setting of heritage assets to enhance or better reveal their significance and further,

⁸ Bedford Borough Council v SSCLG and Nuon UK Limited [2013] EWHC 4344 (Admin).

⁹ The balancing exercise was the subject of discussion in City and Country Bramshill v CCLSG and others [2021] EWCA, Civ 320.

that proposals that preserve “*those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably*”.

- 2.15** Paragraph 207 of the NPPF states that not all elements of a Conservation Area (or World Heritage Site) will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 201 or less than substantial harm under paragraph 202, as appropriate, taking into account the relative significance of the Conservation Area or World Heritage Site as a whole.¹⁰

Local Planning Policy

LBRUT Local Plan

- 2.16** The LBRUT Local Plan was adopted in July 2018. Relevant policies to this application are included below.

- 2.17** **LP1 Local Character and Design Quality:** The Council will require all development to be of high architectural and urban design quality. The high-quality character and heritage of the borough and its villages will need to be maintained and enhanced where opportunities arise. Development proposals will have to demonstrate a thorough understanding of the site and how it relates to its existing context, including character and appearance, and take opportunities to improve the quality and character of buildings, spaces and the local area.

LP3 Designated Heritage Assets: The Council will require development to conserve and, where possible, take opportunities to make a positive contribution to, the historic environment of the borough. Development proposals likely to adversely affect the significance of heritage assets will be assessed against the requirement to seek to avoid harm and the justification for the proposal. The significance (including the settings) of the borough's designated heritage assets, encompassing Conservation Areas, listed buildings, Scheduled Monuments as well as the Registered Historic Parks and Gardens, will be conserved and enhanced, will be

¹⁰ C.f. South Oxfordshire DC v SSE & J Donaldson (March 1991, CO/1440/89).

conserved and enhanced by the following means:

"1. Give great weight to the conservation of the heritage asset when considering the impact of a proposed development on the significance of the asset.

2. Resist the demolition in whole, or in part, of listed building. Consent for demolition of Grade II listed buildings will only be granted in exceptional circumstances and for Grade II and Grade I listed buildings in wholly exceptional circumstances following a thorough assessment of the justification for the proposal and the significance of the asset.*

3. Resist the change of use of listed buildings where their significance would be harmed, particularly where the current use contributes to the character of the surrounding area and to its sense of place.

4. Require the retention and preservation of the original structure, layout, architectural features, materials as well as later features of interest within listed buildings, and resist the removal or modification of features that are both internally and externally of architectural importance or that contribute to the significance of the asset.

5. Demolitions (in whole or in part), alterations, extensions and any other modifications to listed buildings should be based on an accurate understanding of the significance of the heritage asset.

6. Require, where appropriate, the reinstatement of internal and external features of special architectural or historic significance within listed buildings, and the removal of internal and external features that harm the significance of the asset, commensurate with the extent of proposed development.

7. Require the use of appropriate materials and techniques and strongly encourage any works or repairs to a designated heritage asset to be carried out in a correct, scholarly manner by appropriate specialists.

8. Protect and enhance the borough's registered Historic Parks and Gardens by ensuring that proposals do not have an adverse effect on their significance, including their setting and/or views to and from the registered landscape.

9. Protect Scheduled Monuments by ensuring proposals do not have an adverse impact on their significance.

B. Resist substantial demolition in Conservation Areas and any changes that could harm heritage assets, unless it can be demonstrated that: 1. in the case of

substantial harm or loss to the significance of the heritage asset, it is necessary to achieve substantial public benefits that outweigh that harm or loss; 2. in the case of less than substantial harm to the significance of the heritage asset, that the public benefits, including securing the optimum viable use, outweigh that harm; or 3. the building or part of the building or structure makes no positive contribution to the character or distinctiveness of the area.

C. All proposals in Conservation Areas are required to preserve and, where possible, enhance the character or the appearance of the Conservation Area."

2.18 Local Plan Policy LP 38 is also relevant:

Policy LP38 states that, "existing housing should be retained. Redevelopment of existing housing should normally only take place where;

- a. first been demonstrated that the existing housing is incapable of improvement or conversion to satisfactory standard to provide an equivalent scheme; and, if this is the case*
- b. the proposal does not have an adverse impact on local character; and*
- c. the proposal provides a reasonable standard of accommodation, including accessible design, as set out in LP 35 Housing Mix and Standards"*

London Plan 2021

2.19 The London Plan 2021 is the spatial development strategy for greater London and is part of the statutory development plan for London.

2.20 Policy HC1 - Heritage conservation and growth Part C states:

Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

2.21 Part D of HC1 relates to archaeology as follows:

Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.

Local Guidance

2.22 The *St Margaret's Estate Conservation Area Study*, July 2001, has been taken into account in the preparation of this report. The guidance contained within this document has also informed the design and planning of the proposed development.

National Guidance Documents

National Planning Practice Guidance (NPPG)

2.23 The National Planning Practice Guidance (NPPG; ref: 18a-018-20190723; updated July 2019) provides advice on enhancing and conserving the historic environment in accordance with the NPPF.

2.24 NPPG notes that public benefits can be heritage based for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit. The guidance goes on to note that examples of heritage based public benefits include:

- Sustaining or enhancing the significance of a heritage asset and the contribution of its setting;
- Reducing or removing risks to a heritage asset; and
- Securing the optimum viable use of a heritage asset in support of its long-term conservation.

GPA2: Managing Significance in Decision-Taking in the Historic Environment (March 2015)

2.25 This document provides advice on numerous ways in which decision making in the historic environment could be undertaken, emphasising that the first step for all applicants is to understand the significance of any affected heritage asset and the contribution of its setting to that significance. In line with the NPPF and PPG, the document states that early engagement and expert advice in considering and assessing the significance of heritage assets is encouraged. The advice suggests a structured, staged approach to the assembly and analysis of relevant information:

- 1) Understand the significance of the affected assets;
- 2) Understand the impact of the proposal on that significance;
- 3) Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
- 4) Look for opportunities to better reveal or enhance significance;
- 5) Justify any harmful impacts in terms of the sustainable development objective of conserving significance balanced with the need for change; and
- 6) Offset negative impacts to significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (December 2017) (GPA 3 – 2nd Edition)

2.26 Historic England's GPA 3 (2nd Edition) notes that the NPPF makes it clear that the setting of a heritage asset is the surroundings in which it is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral. The guidance notes:

'Setting is not a heritage asset, nor a heritage designation, though land within a setting may itself be designated. Its importance lies in what it contributes to the significance of the heritage asset. This depends on a wide

range of physical elements within, as well as perceptual and associational attributes pertaining to, the heritage asset's surroundings.'

2.27 An assessment of the potential effect on the significance of the identified heritage assets by the Proposed Development should be considered using the following steps:

- Step 1: identify which heritage assets and their settings are affected;
- Step 2: Assess the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;
- Step 3: assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it;
- Step 4: explore the way to maximise enhancement and avoid or minimise harm;
- Step 5: make and document the decision and monitor outcomes.

2.28 This guidance has been considered when assessing the contribution of setting to the significance of the heritage assets potentially affected by the proposed development on the Site.

2.29 Step 1 of the guidance corresponds to Section 1 of this Heritage Statement. Step 2 is applied in the section on Heritage Significance (Section 4). Steps 3 and 4 are applied in Sections 5 and 6 (Heritage Impact Assessment and Conclusions) with reference to the table in **Appendix 2**.

3. Background and Development

Saint Margaret's Estate / the Site

- 3.1** The area surrounding the application site was developed as a planned estate by the Conservative Land Society in 1854 with large, detached brick houses. The estate was developed on land previously forming part of the St Margaret House Estate following the advent of the railway which opened up the Twickenham area are to rapid economic growth. The estate and was laid out on a garden suburb plan with spacious plots based around three enclosed open spaces.
- 3.2** The Conservative Land Society was formed in 1852 to exploit the idea of building societies, which themselves dated from 1775, and the 1832 Reform Act. Initiated by the Liberals in Birmingham in 1847, the basic idea was to purchase sites and develop them so that the residents would be obliged to become registered voters in the interests of the party concerned.
- 3.3** Historic Maps from 1863 (**Figure 6**) demonstrate that the Site was occupied by a boathouse built for the then St Margaret's House, the Royal Navel Female School built in 1805 and demolished in the 1930s. St Margaret's House is the large house visible in the 1930s aerial views shown in **Figures 8** and **9** and the river view in **Figure 10**.



Figure 6: 1863 Ordnance Survey Map – 25 inches to a mile



Figure 7: 1864-65 Ordnance Survey Map – 6 inches to a mile. Reproduced with the permission of the National Library of Scotland



Figure 8: 1937 aerial view of the Site surroundings from the south. Source: Britain from Above



Figure 9: 1937 aerial view from the south – detail of the Site buildings – Dick Waite’s Boathouse



Figure 10: St Margaret's House. Undated but likely early 20th century photograph



Figure 11: 1959 Ordnance Survey Map

3.4 In the 1960s, the Site is labelled as 'works' indicating its use as a boat building workshop and yard (**Figure 11**). It was then still known as Dick Waite's

Boathouse,¹¹ but in the 1960s the Site was sold and redeveloped by Jim Sims, a builder of racing boats, who built the existing building though this was subsequently altered (see below). This building provided meeting rooms, commercial film and recording studios, offices and residential quarters for use of the boatyard. By 1976 the building was in a dilapidated state when Pete Townshend, song writer, guitarist and founder member of The Who bought it from Bill Sims for the purpose of remodelling it to house the Eel Pie Studios.

3.5 The present structure is two-storey with about 7500 square feet of interior space, and the site includes about 12,900 square feet (0.3 acres) of land. The studios and control rooms are sound-proofed and air-conditioned with raised wood-strip flooring that provides concealed cable runs. The building is of cavity wall construction with brick veneer and has a hipped roof of interlocking concrete tiles. Parts of the upper storey are covered with faux timber panels. The property includes a paved terrace on the first-floor level, a glazed conservatory on the north side, a double garage and additional parking and a garden with paved walkways. The side of the property adjoining the public road and walkway is walled. A Dutch barge which is outfitted as a floating studio called *Grand Cru* was previously moored at the property, connected by a gangway.

3.6 Eel Pie Studios was already in business at 45 Broadwick Street when Townshend bought the new building. Although operation of the company took place at both locations, the studios in The Boathouse later became known as Oceanic Studios. The studios were occupied by the band Cocteau Twins in the 1990s, who called it September Sound, and also the Liverpool band the Lightning Seeds.

3.7 The Boathouse was adapted for residential use and Pete Townshend sold the property in 2008 to Hi2 Limited, but retained ownership of the Dutch barge, Grand Cru. The Boathouse was acquired by the Boathouse Twickenham Ltd in 2016. The Site remains in residential use, retains its own jetty and mooring and occupies a focal point of the Thames Path at its junction with Ranelagh Drive and the lock.

3.8 A search of Richmond Council's online catalogue has uncovered many historical images (paintings/photographs/drawings) of St Margaret's House, or the River

¹¹ Collins, Phil; Banks, Tony; Gabriel, Peter; Rutherford, Mike; Hackett, Steve (18 September 2007). *Genesis: Chapter and Verse*. See also Westminster Gazette - Wednesday 30th September 1925, p.5 (National Newspaper Archive)

Thames, but none include the original boathouse with double gables facing the River Thames, visible in **Figures 8** and **9**.

4. Statement of Significance

- 4.1** This part of the report considers the heritage interest of the Site and the St Margaret's Conservation Area as well as the Richmond Footbridge, Lock and Sluice Gates, including the contribution made by the Site to their significance.
- 4.2** It is recognised that not all parts of a heritage asset will necessarily be of equal significance. In some cases, certain aspects or elements could accommodate change without affecting the government's objectives, which include 'intelligently managed change', and which seeks to ensure decisions are based on the nature, extent and level of significance of those heritage assets affected.
- 4.3** Change is only considered to be harmful where it erodes or negatively affects a heritage asset's significance. Understanding the significance of any heritage asset (along with any contribution made by its setting) is, therefore, fundamental to understanding the ability for the asset to accept change.

St. Margaret's Estate Conservation Area

- 4.4** The St Margaret's Estate Conservation Area has both historical and architectural interest as a mid to late 19th century planned estate dominated by large Victorian Italianate and Gothic villas in spacious plots. Designated in 1971 and extended three times, most recently in 2008, the area has a defined character of red and yellow brick buildings with large specimen trees and tall boundary walls. In addition, Gordon House, which still survives, dates from 1720 and provides both historical and architectural interest to the area, including fine early Robert Adam interiors. The map at **Figure 4** shows the conservation area boundary.
- 4.5** Within the conservation area there is a mixture of architectural styles but the building on the application site does not accord with any other buildings in the area and sits in a unique waterfront position. Its plot shape, location and former use contribute to the historical interest of the conservation area, forming a remnant of the former estate of St Margaret's House. However, the existing building is of poor architectural quality and the material execution is likewise indifferent (**Figure 12**). The building does not form a positive contribution to the area and it at odds with the high-quality design of the other traditional buildings. The demolition and

replacement of the existing building represents a notable opportunity for enhancement.



Figure 12: View of the Boathouse and associated air conditioning external plant from the southeast

4.6 The site forms an important component in local views along Ranelagh Drive, which forms a promenade to the south, and from the tow paths northwest along the Thames and from the opposite riverbank (**Figures 13–16**). As the building extends right up to the back of the footpath, the existing single storey element creates a focal point in views facing northwest and southeast along the river tow path respectively (**Figure 17**). These views demonstrate that the Site occupies a distinctive position within the significant riparian landscape of this part of the River Thames.



Figure 13: View of the Site from Ranelagh Drive to the south



Figure 14: View of the Site from the northwest (Thames tow path)



Figure 15: View northwest from the Richmond Footbridge with the Boathouse visible to the left



Figure 16: View of the Site from the northeast (opposite bank Thames towpath) with Richmond Lock and its variety of kiosks in the foreground



Figure 17: Long range view towards to Site from the northwest, Thames towpath with Richmond Footbridge to the left

Richmond Footbridge, Lock and Sluices

4.7 This important structure and associated buildings (listed grade II* - **Figure 18**) was added to the National heritage Listed for England in May 1983 and is the closest listed building to the Site. The structure provides forms important landmark and well used pedestrian link between the east and west sides of the river, enabling access to Richmond from Isleworth. The list description provides the following details;

"Foot bridge incorporating lock and sluices. 1891, designed by the engineer F.G.M. Stoney (1837-97) who took out 7 patents relating to sluices between 1873 and 1894, but design of the lock-houses by the surveyors Hunt and Steward and ironwork by the firm of Ransome and Rapier of Ipswich. 2 parallel 5 arched bridges of cast iron supported by stone piers with brick and stone lock houses at each end. Each bridge has 5 flat arches of cast iron with spandrels lightened and decorated by vertical slots. Stone piers have round-headed niches to keystones above pointed cutwaters. Elaborate cast iron balustrade with lamp standards positioned over centres of arches. On each bank the bridge is elevated on a brick base serving as a lock keepers cottage with stone dressings and

double flight of steps. The overall span is of 348 feet. The central 66 feet spans incorporating 3 sluices which can be raised and stowed horizontally in the space between the 2 bridges. Beneath the outer spans, each of 50 feet were three parallel lines of rollers of which one now remains. the bridges carry public walkways (all closed at time of survey) and there is a toll booth of brick and weather boarding with fretted canopy at the upper level on the Surrey side. This bridge has considerable importance in the history of hydraulic engineering as Stoney first applied here the principal of the floating sluice gate and here pioneered his apparatus for turning the lifted gates into the horizontal position. These principals were later used in his Manchester Ship Canal (1894) and Aswan Dam (1902).



Figure 18: Richmond Footbridge, Lock and Sluices from the west and approach steps (right)

4.8 This building has both architectural and historical interest as an elaborately designed cast iron footbridge and lock / sluices gates. The structure incorporates Italianate style Lock Houses at each end, partly concealed by the flanking approach steps. There is a former toll booth on the Surrey side at the upper level (**Figure 19**), as well as numerous timber kiosks associated with the working of the river lock (**Figure 16**). It is a key landmark along this stretch of the river and contributes to the character of the conservation area (which includes half of the bridge) and the setting of the Kew World Heritage Site (see below).

4.9 The application Site occupies an important position within the setting of the listed footbridge, being co-visible or directly visible in relation to various key views of the heritage asset (see above Figures and **Figure 20** below). However, besides the adjoining riverbank it does not contribute positively to the asset's significance.

Indeed, insofar as the existing building is a poorly detailed and lacklustre example of 1960s architecture, the Site, in its degraded state and in conjunction with the sprawling external air conditioning vents and associated plant, detracts from the aesthetic of the surroundings. Overall, the Site comprises a moderately negative element of the setting.



Figure 19: Former toll booth with fretted timber canopy at upper level to the Surrey side (east) side of the footbridge



Figure 20: View northwest along Ranelagh Drive towards the Site with the Richmond Footbridge to the right. Source: Google Street View (May 2022), accessed 01/09/2022

- 4.10** The proposed redevelopment has had regard to views of the footbridge from the Thames Path to both sides of the river and wider area to ensure the structure retains its provenance (see section 5).

Royal Botanic Gardens Kew World Heritage Site and RPG

- 4.11** The WHS buffer zone takes in the entirety of the River Thames to the west of the registered park and garden and includes the towpath adjacent to the application site, abutting the red line boundary. This designated area is of very high heritage significance as part of the setting of Kew Royal Botanical Gardens and its surrounding tree belts and the river. Views and up and down the Thames Path along this stretch of the river provide an attractive and historic route through this part of west London and have changed relatively little since the 18th and 19th century.
- 4.12** The Boathouse exists as an anomaly along this stretch of the river given its age, plot, proximity to the water and frontage onto the towpath. It does not contribute to the heritage significance or setting of the WHS or RPG. The comments in relation to the Richmond Footbridge apply equally to the WHS and RPG, i.e., the Site's redevelopment provides an opportunity to enhance the setting of these highly graded heritage assets.
- 4.13** The proposed development has taken these factors into consideration to ensure that the scale, character and material quality of the replacement dwelling is commensurate with the sensitivities of the Site. The style and appearance of the proposed replacement building is considered in Section 5 below.

5. Heritage Impact Assessment

5.1 This chapter of the report assesses the impact of the proposed development on the significance of the heritage assets identified in the previous chapter, including effects on the setting of those assets with reference to the tabular methodology set out in **Appendix 1**. It equates to Step 3 of GPA3, which has a close connection with Step 2. This chapter should be read in conjunction with the preceding chapter, and the tabular GPA3 assessment in **Appendix 2**.

Summary of Proposed Development

5.2 The proposed development seeks to transform Site following demolition of existing residential building and outbuilding and structures by means of a highly sustainable new building of good quality design to provide three townhouses. The riverside footpath and perimeter of the site will also be much improved through new boundary treatment, with lower plinth walls, railings and widening the footpath to enhance the overall experience for local residents and visitors to the area.

5.3 Flood defence is a key component of the design and has been fully integrated into the application scheme to ensure the building is compliant with the relevant standards. This requires a significant financial investment into flood defences for the site.

5.4 The proposed design and layout are illustrated at **Appendix 3** and the design development is described in detail within the accompanying Design and Access Statement prepared by Silver Jetty.

5.5 Further to pre-application engagement with Historic England, it is important to note the changes made to the withdrawn proposal as part of this submission. These are listed below and include a meaningful reduction in the proposed building's overall massing, improvements to the design and enhanced interaction with the public realm through hard landscaping. The key changes made are as follows:

- The building width on 1st and 2nd floors has been reduced by 5.35 metres;
- Ground floor building element width has been reduced by 2.4 metres;
- The depth of the building from North to South has been reduced by 1m;

- 1m high metal balustrading has been removed from all round the perimeter parapet and now reduced into a consolidated area of terrace and glass balustrading;
- The perimeter wall height has been reduced from 2.1m to 1.7m and now has a black top rail similar to the existing on site;
- The gabion wall has been removed and substituted with a continuation of the brick wall. It is terraced back to include for planting and to create a less enclosed ambience along the towpath;
- The single storey ground floor building element is expressed in terracotta brickwork to more closely reference the colour of the lock lodges. The stone "picture frame" windows remain in response to the end windows of the lock lodges and a stone coping is introduced at the top of the single storey element to cap the top in the same way as the lodges;
- A substantial "green roof" of just under 200sqm is included to enhance the biodiversity of the Site, improved well beyond the concrete hard standing of the existing building;
- The set back of the restricted patio makes way for a large area of Sedum roof.
- Windows have been carefully placed to address any over looking issues. Windows have metal extrusions around their perimeters to reduce light pollution and to add fine detail to the facades and to create oblique angle shading. The gable ends are expressed in bronze metal and integral planting has been introduced to add visual interest;
- Decorative brickwork details have been introduced as well as new timber and glass treatments to add texture to the facades and to provide shading and reduce nocturnal light spill on the river side elevation. Stone has been substituted between the gables of the façade to achieve a higher quality finish, consistent with the metal and stone detailing of the lock lodges.
- Parking spaces have an electrical charge point per two spots.

5.6

In terms of the design of the main frontage to the river (north elevation), the width is essentially the same as the existing building (first floor and roof) with significant reductions made from either side of the withdrawn proposal together with a reduction of 250mm to each flat roof section. This represents a total reduction of

5.35m compared to the withdrawn scheme or 23%. By way of illustration, within the Design and Access Statement document there are elevations which overlay the building as it stands today. These show that the proposed composition is now more central to the existing building and only bigger in the sense that the hipped roof has been 'shouldered'.

5.7 The design of the upper floors has been enhanced, appearing more coherent with each house comprised of a gable end and flat roof section to one side so reads intelligibly as three dwellings.¹² Furthermore, due to the constraints of the site, the upper building is not aligned with the three broad bays comprising the ground storey 'plinth'. The subtle asymmetry applied to the upper part of the building, with flat roofs to the left of the gabled bays, develops this inevitable syncopation in a way which avoids an awkward clash between the two 'parts'. The tendency of the flat roofed elements is to draw the eye to the left and back to the ground floor 'plinth' on which the design is centred. The connection with the ground level is therefore still expressed and avoids the wider plinth and much narrower upper part being read as disparate elements when seen from across the river. As a result of this more holistic approach to design the building will have a more unified appearance.

5.8 Further to withdrawing the application in December 2022, the approach has been to reduce all of the houses so that they are equal, balanced and work internally and externally and provide compliant bedrooms with the correct statutory circulation and stair widths.

5.9 It was agreed with Historic England that a flat roof would be inappropriate, so the gables have been retained to define the number of houses and provide a granular appearance requested by LBRUT following the original submission for the apartment scheme. The gabled frontage also pays homage to the double gabled arrangement of the Victorian boathouse visible in **Figure 9**.

5.10 In terms of height, the roof ridge line of the existing building is maintained within the flat roof elements of the application scheme. Only the shallow gables project above this. The scheme is therefore appreciably lower in height than the houses

¹² If the flat section from house 03 were to be removed to contrive a fully symmetrical frontage, this would significantly reduce the house width, making it unviable as a dwelling and compositionally would no longer work in balance with the overall composition.

and apartments of Martineau Drive and thus reads as subservient to these properties in longer range views from the east towpath and from where it may be seen from Kew Deer Park. However, prepared CGIs indicate views of the development from the deer park would be largely imperceptible, particularly with the significant reduction in width now incorporated. The hierarchy of built form within the local townscape would therefore be preserved (see below).

- 5.11** The design responds positively to the EA requirements by raising the ground floor level up by 1.6m and with this in mind, the effectiveness of the design to create a scheme that is sensitive to the setting and compliant in all other respects is self evident.
- 5.12** The removal of the overbearing canopy and the confused appearance of the existing building (a longstanding detractor), combined with the setting back of the proposed ground floor and terrace will significantly improve the experience of the MOL together with the widening of the towpath.
- 5.13** Boathouse precedent images are set out in the Design and Access Statement, particularly the Richmond Boathouse and its context. These illustrate how the proposed design is firmly rooted in this distinctive riparian building typology.

Assessment of Impact

Effect on the Character and Appearance of the St Margaret's Estate Conservation Area

5.14 There are two distinct matters which need to be addressed when discussing the impact of the application proposals on the conservation area: the principle of demolition within the conservation area and the suitability of the replacement building.

Principle of Demolition

5.15 The demolition of the existing building will remove a negative building within the conservation area, together with the removal of poor-quality hard landscaping, boundary walls and surface treatment. Some elements, such as weeping birch trees to the southern corner of the Site, will be retained, however, the proposal clearly represents an opportunity for enhancement within the conservation area and setting of the Richmond Footbridge and Royal Botanic Gardens Kew WHS and RPG.

5.16 LBRUT have indicated their support for the demolition of the existing building, which has no architectural interest (see paragraph 1.5). The building's heritage value is limited to its associations with the long-standing activity of boat building / repair within the Site and the cultural interest derived from connections with well known pop musicians from the mid-1970s onwards, notably Pete Townsend of The Who. This aspect of the Site's history is well known and can be recorded / deposited with the local archive by means of a Level 1 building record. The effect of the proposals on the conservation area's significance must also take into account the replacement building.

The Replacement Building

5.17 As outlined in Section 2, Recent case law (*Dorothy Bohm & Ors v Secretary of State for Communities and Local Government & Ors [2017] EWHC 3217 (Admin)*) clarifies the position with regards to the correct application of legislation when dealing with positive contributors in conservation areas. The case law states:

"... when considering the impact of the proposal on the CA under s.72 [of the Planning (Listed Buildings and Conservation Areas) Act 1990] it is the impact of

the entire proposal which is in issue. In other words, the decision maker must not consider merely the removal of the building which made a positive contribution, but also the impact on the CA of the building which replaced it.”

- 5.18** The existing building is not a positive contributor; however, the application must be considered in the round, addressing not only demolition within the conservation area but also the quality and suitability of the replacement building.
- 5.19** In respect of the replacement building, a high-quality modern design is proposed as described above. This builds on the positive aspects of the Site’s history as a boat building workshop and yard. The building occupies a similar footprint to the existing and the design incorporates architectural references to the gabled boathouse present in the 1920s and replaced in the 1960s by the current building. The lower single storey element to the eastern side pays homage and makes reference to the low-slung Italianate Lock Houses incorporated within the structure of Richmond Footbridge to the southeast, both in terms of its brickwork colouring and detailing. This element of the design presents simple symmetrical frontages to the adjacent Thames towpath and would form an understated focal point in local views looking northwest – southeast which have co-visibility and direct inter-visibility with the Footbridge (*cf. Figures 14–17*).
- 5.20** The materials combine good quality buff brick, a staple facing material within the conservation area, shallow slated roofs, carefully proportioned windows and glazed doors of bronze coloured metal, and a warm red brick for the ground floor level and boundary wall.
- 5.21** The proposed scale and massing of the three-storey element of the building is considerably reduced compared to the withdrawn scheme such that the new building would be of a comparable height to the existing. The three storeys make the replacement building broader where there is presently a large hipped roof, but with a much more effective composition to each side and particularly to the river frontage (see North and South Elevations at **Appendix 3**).
- 5.22** The replacement building has considerably greater architectural merit than the existing building and resonates well with the recent housing to the northwest (developed by Octagon) and the features of the Richmond Footbridge. Given the Site’s prevalent co-visibility with the latter structure and overall prominence in

views along the Thames towpaths, the design responds intelligently to the heritage sensitivities of the surroundings and would contribute positively to local views and character and appearance of the conservation area as a whole.

5.23 Accordingly, the proposed scheme is regarded as betterment compared to the existing building in heritage terms and would meet the NPPF objective for achieving sustainable development, with a notable enhancement of the environmental aspect of the Site's long-term future. The improvements to the adjacent public realm likewise represent noticeable enhancements to the conservation area and further the social objective of the NPPF through promoting strong, vibrant and healthy communities.

5.24 In summary, the proposed development would remove a detractor building within the conservation area and introduce a terrace of three townhouses that would reinforce local character and distinctiveness in line with paragraph 197 of the NPPF. Furthermore, the improved values of sustainability and accessibility embedded within the design of the replacement building should be weighed favourably in the balance of a justifiable need for change.

5.25 The net effect of the development in heritage terms is an enhancement of the street scene and river views in this part of the conservation area. The proposed architectural design is both sympathetic and draws from the local character and distinctiveness of the local context.

5.26 Accordingly, there is preservation and enhancement for the purposes of the decision maker's duty under Section 72(1) of the Act. Paragraph 202 of the NPPF is not engaged. The significance of the St Margaret's Estate Conservation Area would be sustained in compliance with paragraph 197 of the NPPF.

Effect on Richmond Footbridge and Royal Botanic Gardens Kew WHS and RPG

5.27 The assessment undertaken above has found that the proposal would result in some enhancement of the character and appearance of the conservation area. As already noted, the replacement building has considerably greater architectural merit than the existing building and the design resonates well with the recent housing to the northwest (developed by Octagon) and the features of the Richmond

Footbridge, whilst reinforcing through architectural expression the historic activity of boat building within the Site.

5.28 In terms of views, the Site is generally co-visible with the Richmond Footbridge and features prominently in west facing views out of the RPG / WHS and in views along the Thames towpaths. The design responds intelligently to the heritage sensitivities of this well-established context, neither obscuring any important views of nor distracting the viewer from either heritage asset. The design and materiality are subdued and carefully considered in light of pre-application comments from Historic England with regard to materials, the reduction in massing, built form and footprint. The boundary treatment and revised hard and soft landscaping to the river towpath would yield a greatly improved experience of the riverside setting of the footbridge and RPG location on the opposite riverbank.

5.29 Insofar as the replacement building contributes positively to local views and character and appearance of the conservation area as a whole, as concluded above, the effect upon the setting of Richmond Footbridge and the RPG / World Heritage Site would likewise be positive.

5.30 Accordingly, there would be preservation for the purpose of the decision maker's duty under Section 66(1) of the Act and the significance of all three heritage assets would be sustained in compliance with paragraph 197 of the NPPF.

Summary of effects

5.31 In summary the proposal will not result in any harm to any designated heritage assets. Paragraphs 201 and 202 of the NPPF are not engaged. There is no harm for the purposes of paragraphs 199-200 of the NPPF or for the exercise of the statutory duty under sections 66(1) and 72(1) of the Act. There would be no conflict with any local policies. Thus, the Proposed Development is considered acceptable in heritage terms.

6. Conclusion

- 6.1** This Heritage Statement has been prepared on behalf of The Boathouse Twickenham Limited in accordance with paragraph 194 of the NPPF and supports an application for demolition of the existing building and new development within the Site. The Report provides a proportionate assessment of the significance of relevant heritage assets and the contribution of the Site to their respective settings and significance. This is followed by an assessment of the effect of the proposals on the significance of these heritage assets.
- 6.2** It is concluded that the proposed scheme of development would remove a detractor building within the St Margaret's Estate Conservation Area and introduce a high-quality new development comprising a terrace of three townhouses. The development would reinforce local character and distinctiveness in line with paragraph 197 of the NPPF.
- 6.3** The net effect of the development in heritage terms is an enhancement of the street scene and river views in this part of the conservation area and likewise enhancement of the setting of the Richmond Footbridge (grade II*), Royal Botanic Gardens Kew World Heritage Site and registered park and garden (grade I). The development would not result in any harm to the significance of the identified heritage assets for the purposes of paragraph 199 of the NPPF. Paragraphs 201 and 202 of the NPPF are not engaged and the Scale of Harm tabulated at **Appendix 1** of this report does not apply. There is preservation for the purposes of the decision maker's duty under Sections 66(1) and 72(1) of the 1990 Act.
- 6.4** Furthermore, the use of high-quality materials and locally relevant design and landscaping will reinforce the positive visual impact of the proposed replacement building. Together with much improved public realm along the adjacent Thames towpath, accessibility, and all-round sustainability, this will ensure the long-term effect of the development is consistent with the NPPF's primary objective of achieving sustainable development.
- 6.5** The Application Scheme would also provide a public benefit in the form of new residential development of high-quality design and fully compliant with lifetime homes standards, which can be weighed in the planning balance, along with

improvements to the street scene of Ranelagh Drive and the adjacent public rights of way.

6.6 Paragraph 206 of the NPPF recommends that 'Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.' In this case, the proposed development will enhance and better reveal the significance of the St Margaret's Estate Conservation Area and preserve Richmond Footbridge and Royal Botanic Gardens Kew in line with paragraph 206.

6.7 The proposed development complies with all local and regional policies relating to the historic environment. The Council is invited to treat the proposal favourably in compliance with paragraph 206 of the NPPF.

Appendix 1

Scale of Harm (HCUK, 2019)

The table below has been worked up by HCUK Group (2019) based on current policy and guidance. It is intended as simple and effect way to better define harm and the implications of that finding on heritage significance. It draws on various recent appeal decisions and reflects the increasing importance being put on the contribution of setting to significance and the need to create a greater level of clarity within the finding of less than substantial harm (see the NPPF, paragraph 194-196). This has been proving more and more necessary and the table below goes some way to reflect the most recent updates (2019) to the guidance set out within the NPPG¹³

Scale of Harm	
Total Loss	Total removal of the significance of the designated heritage asset.
Substantial Harm	Serious harm that would drain away or vitiate the significance of the designated heritage asset
Less than Substantial Harm	High level harm that could be serious, but not so serious as to vitiate or drain away the significance of the designated heritage asset.
	Medium level harm, not necessarily serious to the significance of the designated heritage asset, but enough to be described as significant, noticeable, or material.
	Low level harm that does not seriously affect the significance of the designated heritage asset.

HCUK Group, 2019

¹³ See NPPG 2019. Section: 'How can the possibility of harm to a heritage asset be assessed?'. Paragraph 3, under this heading notes that '*within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.*'

Appendix 2

GPA3 Assessment: Historic England’s guidance on setting

In assessing the effect of the proposed development on the setting and significance of Richmond Footbridge / Royal Botanic Gardens Kew, it is relevant to consider how the following factors may or may not take effect, with particular reference to the considerations in Steps 2 and 3 of GPA3. The following analysis seeks to highlight the main relevant considerations.

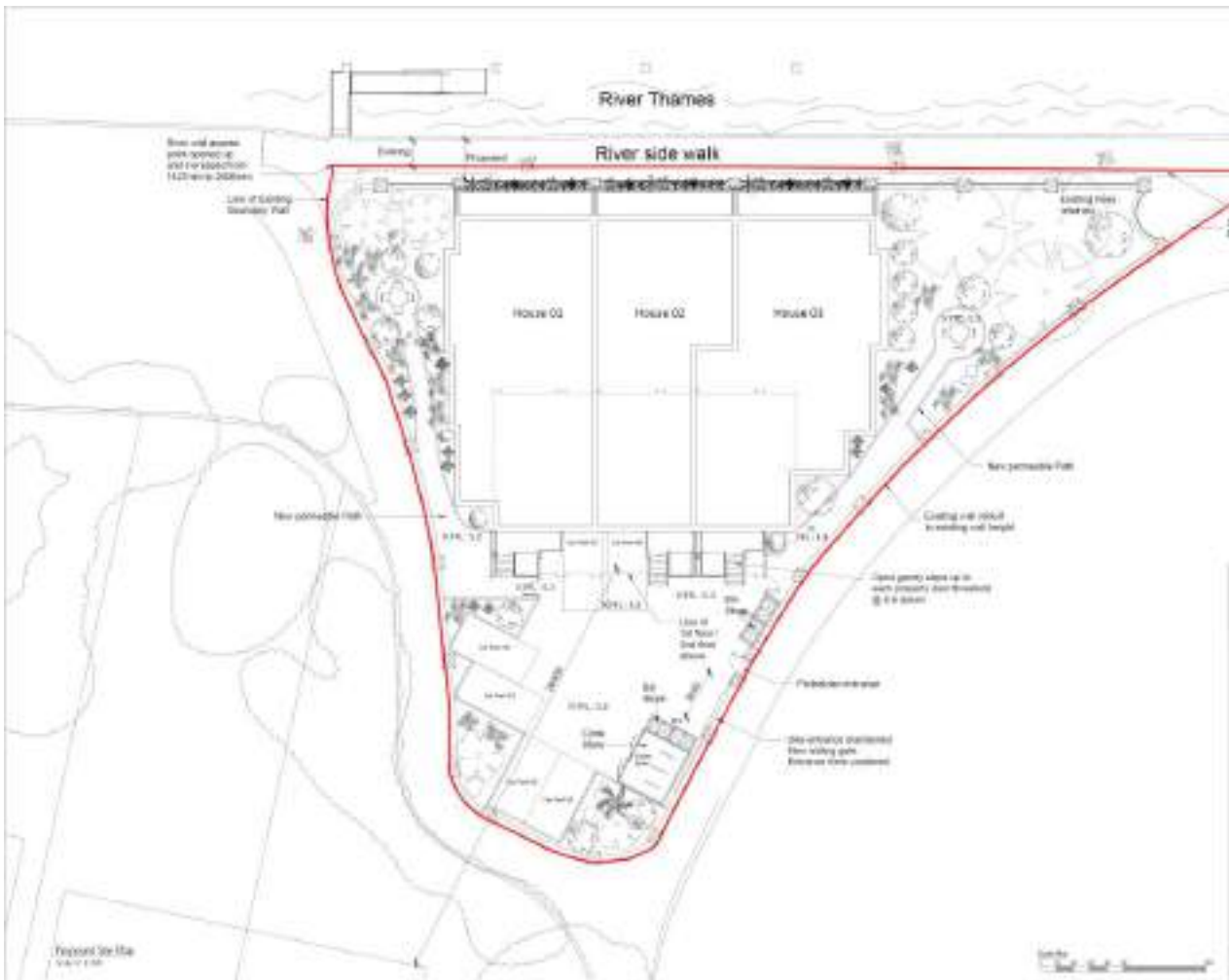
Relevant Considerations **Richmond Footbridge / Royal Botanic Gardens Kew (WHS & RPG)**

<i>Proximity of the development to the asset</i>	See Figure 1 .
<i>Proximity in relation to topography and watercourses</i>	The Site forms part of the Metropolitan Open Land alongside the west bank of the River Thames and is co-visible with both heritage assets (counting the overlapping designation of the WHS and RPG as one) in the sequence of views possible from both banks of the River Thames.
<i>Position of development in relation to key views</i>	See analysis undertaken Sections 4 and 5.
<i>Orientation of the development</i>	The proposed development is aligned with the footprint of the existing building with primary frontages oriented towards the River Thames and away from the river. The northwest and southeast elevations are subordinate in character but nonetheless architecturally treated and forming focal points in longitudinal views along the river bank.
<i>Prominence, dominance and conspicuousness</i>	See Section 5 – paragraphs 5.8-5.17
<i>Competition with or distraction from the asset</i>	In light of the assessment of key views, the proposed development will not result in any competition with or distraction from any of the heritage assets.
<i>Dimensions, scale, massing, proportions</i>	As noted in Section 5 the scale, layout, massing, form and character of the Proposed Development is commensurate with recent residential development within this part of the conservation area, e.g., Martineau Drive development and is not

	<p>overbearing with a tendency to encroach on the surrounding open space and verdant character of the riparian landscape. The development would serve to reinforce the character and appearance of the Thames towpath and vicinity of Ranelagh Drive as well as the wider setting of the identified heritage assets.</p>
<i>Visual permeability</i>	<p>The development will not significantly increase the density and volume of development within the Site and the stepped massing arrangement would preserve the permeability of longitudinal views along the riverbank (northwest-southeast). As such there would be no noticeable loss of permeability and the replacement building is of much higher quality than the existing in terms of architectural design, form and materiality.</p>
<i>Materials and design</i>	<p>See Design & Access Statement prepared by Silver Jetty & commentary in Section 5 (paragraphs 5.2-5.13). The proposed materials provide an appropriate and high-quality response to the heritage context.</p>
<i>Diurnal or seasonal change</i>	<p>The extent of tree cover along the riverbank and surrounding streets would result in increased prominence and inter-visibility with the development in a winter context, though this would not have any material impact on significance due to the low level of discernible, though positive, change within the setting of the affected heritage assets.</p>
<i>Change to built surroundings and spaces</i>	<p>The Proposed Development will effect a noticeable and very positive change within the Site through development of slightly increased height and massing, and greatly improved boundary treatment and associated public realm to the Thames towpath adjoining to the east.</p>
<i>Change to skyline, silhouette</i>	<p>The Proposed Development would not give rise to any noticeable effects on the skyline or silhouette that forms part of the setting of any of the heritage assets.</p>
<i>Change to general character</i>	<p>The proposed Development would have a noticeable and positive effect on the general character of this part of the St Margaret’s Conservation Area and setting of the listed building and Kew Gardens WHS buffer zone / RPG.</p>

Appendix 3

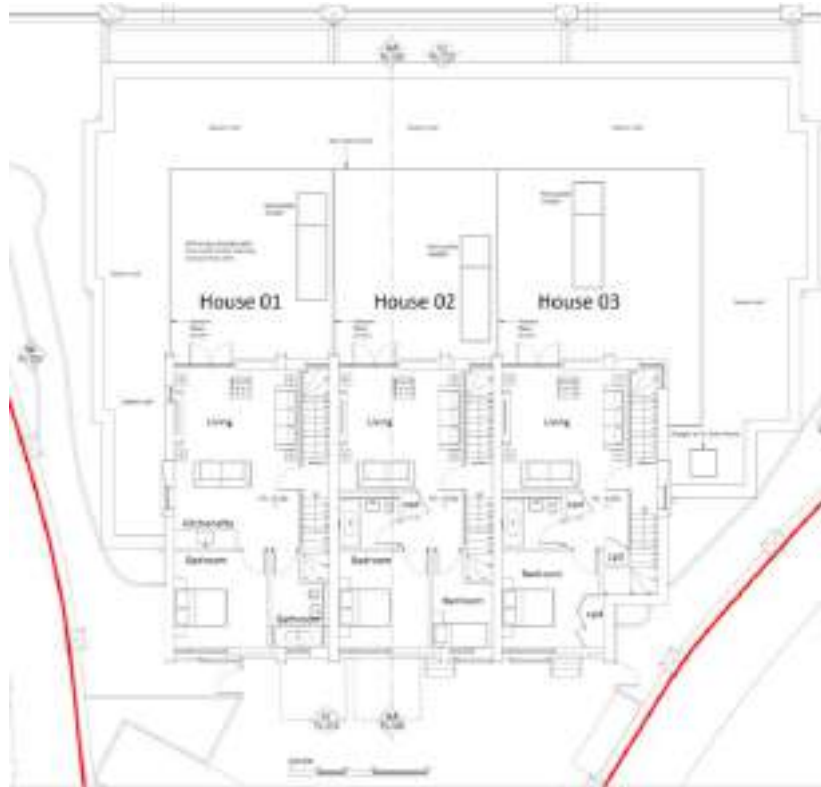
Proposed Scheme Details and Visualisations (Silver Jetty Architects Ltd)



Proposed Site Plan

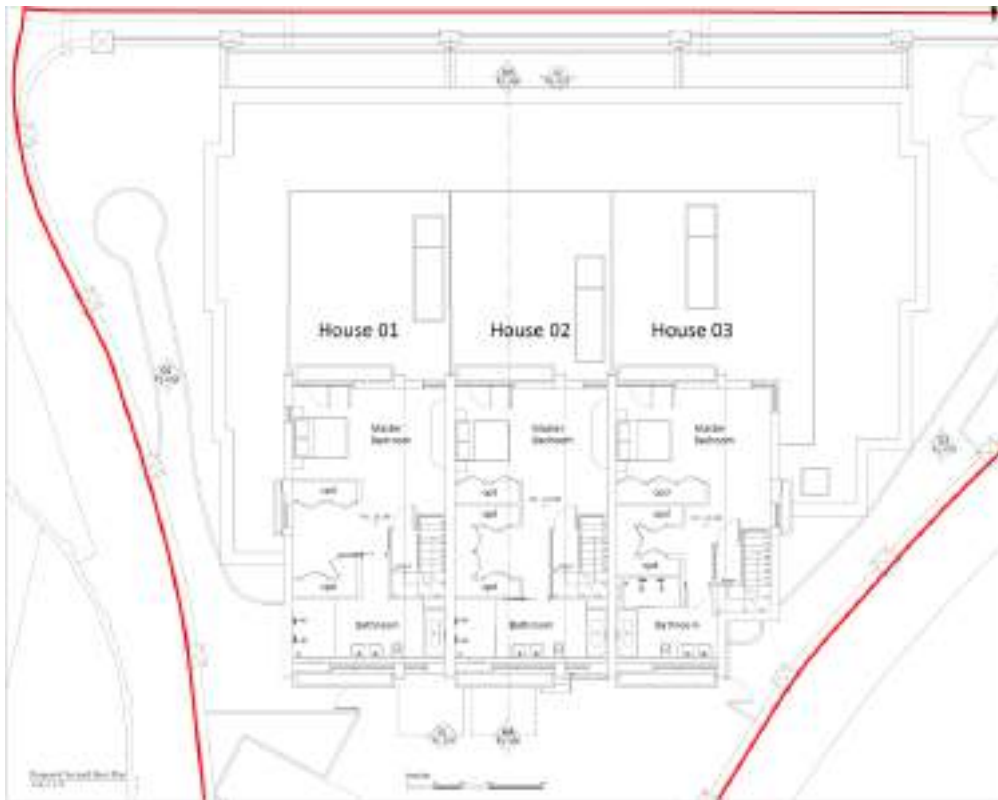


Proposed Ground Floor Plan

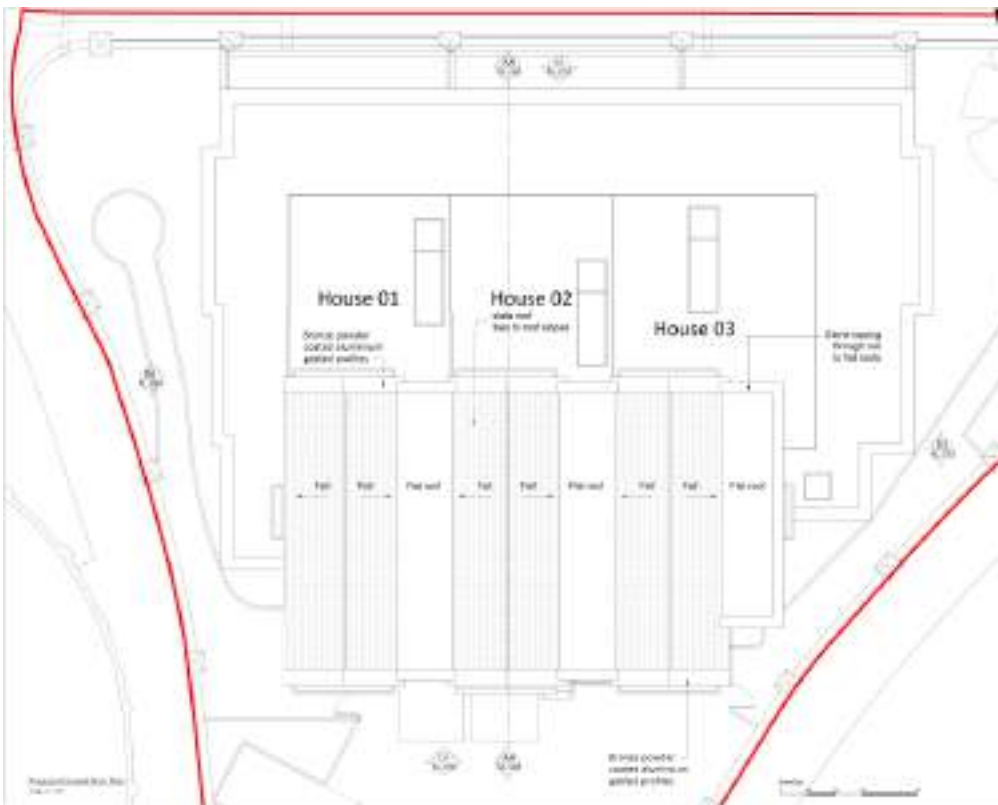


Proposed First Floor Plan (above) and comparison with withdrawn scheme (below)





Proposed Second Floor Plan



Proposed roof plan



Proposed North Elevation
 See also 119

W V U U S Q B I J T X S A V D U O W I G P E F R U V N M U V W

- Material Legend**
- A Bronze powder coated aluminium stable glazed doors
 - B Bronze powder coated aluminium window frames/sills
 - C Bronze powder coated aluminium insulated panels
 - D Bronze powder coated aluminium gabled profiles
 - E Bronze powder coated aluminium and bronze insulated panels
 - F Bronze powder coated aluminium panels
 - G Bronze powder coated aluminium projecting window cassette frame
 - H Bronze coloured open tread external stairs and balustrade
 - I Flat stone framework with projecting frames
 - J Stone copings
 - K Buff brickwork
 - L Buff brick saddle course
 - M Red brickwork
 - N Red brick saddle course
 - O Treated insulated timber panels
 - P Bronze powder coated 316 stainless steel doors with insulated bronze over panels
 - Q Glass balustrade
 - R Porstone
 - S Stone wall with stone coping
 - T Integral planting troughs
 - U Slack metal ceilings
 - V Fine boundary wall with charredwood recessed panels
 - X Juliet balcony
 - W Brick Flies with stone copings

Proposed North Elevation (to river)



Proposed North Elevation indicating reduction in width and height and amendments to perimeter wall compared to withdrawn scheme



N M J G H F F B J E J P I S R O D K L Q J M N

Proposed South Elevation
Scale 1:100

Material Legend

- A** Bronze powder coated aluminium double glazed doors
- C** Bronze powder coated aluminium insulated panels
- E** Bronze powder coated aluminium and timber insulated panels
- G** Bronze powder coated aluminium window frames with White Glass
- I** Flat stone framework with projecting frames
- K** Buff brickwork
- M** Red brickwork
- Q** Treated insulated timber panels
- U** Glass Balustrade
- S** Stone coloured steel columns
- B** Bronze powder coated aluminium window frames/ills
- D** Bronze powder coated aluminium gabled profiles
- F** Bronze powder coated stainless panels
- H** Bronze coloured open iron external stairs and balcony
- J** Stone copings
- L** Buff brick soldier course
- N** Red brick soldier course
- P** Treated insulated timber doors
- R** Planters

Proposed South Elevation



Proposed East Elevation (view along Ranelagh Drive)



Proposed West Elevation (view along Thames tow path)



CGI View from Richmond Footbridge (cf. Figure 3)



CGI view from the northwest (cf. Figures 14 and 17)



CGI view from the northeast



CGI view from the southeast



CGI view from Richmond Deer Park to north east (winter context – maximum visibility)



CGI view from Richmond Deer Park (east) – winter context



CGI view from eastern riverbank to south of Richmond Footbridge



CGI view from the north – winter context



CGI Views of widened and re-landscaped river tow path

Standard Sources

<https://maps.nls.uk>

<https://historicengland.org.uk/listing/the-list>

www.heritagegateway.org.uk

<http://magic.defra.gov.uk>

www.history.ac.uk/victoria-county-history

The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). Historic England (2017 edition)

Planning (Listed Buildings and Conservation Areas) Act, 1990

National Planning Policy Framework, 2019

National Planning Practice Guidance, 2019

Conservation Principles, Policies and Guidance, Historic England (2008)