

## Comment on a planning application

### Application Details

**Application:** 23/1856/FUL

**Address:** The Boathouse Ranelagh Drive Twickenham TW1 1QZ

**Proposal:** Demolition of existing building and outbuildings to provide three residential dwellings including associated landscaping works, provision of parking and works to the public realm.

### Comments Made By

**Name:** River Thames Society Upper Tideway branch Mrs. Hilary Pereira

**Address:** 3 Ducks Walk Twickenham TW1 2DD

### Comments

**Type of comment:** Object to the proposal

**Comment:** We note the changes since the previous application (22/3017/FUL) but our objections and other comments remain fundamentally the same.

We agree with the applicant that the existing structures have no merit, so we support their demolition.

We question whether any replacement should be permitted, most especially in the part of the site which is within 16m of the tidal Thames. With no requirement to be adjacent to the river, unlike the boathouse that started building at this site, we argue the space should be kept clear. The site is within the flood zone, with part of the site falling so close to a tidal river any residential building is problematic. Anticipation of a 1 in 100 years flooding event may not suffice, as the latest projections in TE2100 get further revised, on top of the reduced use of the Thames barrier for fluvial flooding, and the combined impacts of all sources of excess water including whatever might flow from the River Thames Scheme. There is inadequate justification for rebuilding in the flood zone, especially with such an increase in residents.

Part of the site is within MOL, and the exceptional requirements in NPPF 149(d) for a replacement building are not being met: we argue it does have an impact on openness, without adequate compensatory contribution to affordable housing need. The currently-claimed footprint includes non-residential low-lying unidentified structures in the grounds: these do not appear in any of the previously-approved old planning drawings, and at least in part could be external plant for air conditioning. We cannot see how the proposed footprint could really be less than the current, as is being claimed. We note the GIA is to increase from 553.74 to 893.41, a major overall increase, as expected when the current 3 small flats are replaced by 4 bedroom houses, with an increase in overall height and width. Comparisons with the current situation are what matter, not with the application that was withdrawn. The structure remains too big, with additions that are disproportionate to the size of the existing building.

Even if the scale, layout, massing, form and character were to be commensurate with recent residential developments close by, those comparator developments are outside the MOL, a long way back from the river and much further away from the II\* listed lock bridge. The most significant views will be from across the river and in the prospect from Richmond Lock & Weir, and for these the CGIs show obvious and objectionable increases in mass upwards and to the sides. The development being proposed here is intensification and too big for this sensitive area, even assuming permission is granted for any structure to replace the anomalously-placed current building in MOL and a flood zone.

The supposed gain to the public realm is widening of the Thames path, which runs alongside the site, outside the site's ownership. Giving space to this path is an essential and standing expectation from any riverside development, not a special offer as is being presented, albeit welcome in its revised form.