



Historic England

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Direct Dial: 020 7973 3762

Our ref: P01562924

26 July 2023

Dear Miss Vedi

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**THE BOATHOUSE RANELAGH DRIVE TWICKENHAM TW1 1QZ
Application No. 23/1856/FUL**

Thank you for your letter of 6 July 2023 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Historic England Advice

Historic England previously commented on application 22/3017/FUL for an earlier iteration of this scheme on the same site, when we raised concerns about the harm which would be caused to the St Margaret's Estate Conservation Area, the Richmond Lock Bridge, and to a lesser extent, the Old Deer Park. Following the withdrawal of this application, we were engaged in pre-application discussions regarding the proposals. We advised that a notable reduction in massing would be required to limit the harm.

Heritage significance

The application site is located on the banks of the river Thames, in a prominent location in a verdant stretch of the waterway. The current building on the site dates from the late 1960s, and is not of architectural merit. It sits on the site of an earlier, smaller boathouse and works.

The St Margaret's Estate Conservation Area is predominantly an area of Victorian housing developed on the grounds of former large estates. On the riverside, it also contains the Grade II* listed Richmond Lock and footbridge, a technically innovative and decorative 1890s structure. The conservation area appraisal and study note the sense of spaciousness of this area as important, and highlight the apparently rural backdrop to the Thames between Railshead Road and Twickenham Bridge. This backdrop is



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created by the pleasure grounds and other open spaces extending the natural landscape beside the river, which gives a sustained sense of the eighteenth-century landscapes the suburb developed upon. Modern housing has increased development in the area west of the application site in recent decades, but the separation of much of the building line from the river front has been maintained, preserving this sense of rurality, particularly in the summer months.

This part of the Thames draws together a sequence of important landscapes, including the Old Deer Park, part of the Kew Gardens Grade I registered landscape across the river from the site, and lying within the Kew World Heritage Site buffer zone.

The scheme maintains the same broad principles as the original scheme applied for in 2022, though altered in response to comments both at the former application stage and at subsequent pre-application. It entails the demolition of the existing two-storey building on the site, and construction of a three-storey terrace of three houses. The current building does not contribute positively to the conservation area, except in the sense that its unusually prominent location up against the river is a reminder of the former boathouse on this site. However, because of its scale, low-set single-storey north (riverside) section and hipped roof, it has a reasonably reticent presence in the landscape.

Our advice on the original, formally submitted version of this scheme was that the development would be noticeably more prominent in multiple views, due to being considerably larger and bulkier than the existing buildings, reaching to a greater height over a wider area, and extending considerably further to the east when seen from the river. We considered that this would have a harmful effect on the semi-rural character of this part of the conservation area, and assets within it.

In pre-application discussions we further explained particular issues around the volume of the second storey, and discussed the overall form, approaches to the roof, and potential heritage benefits. We were shown a scheme with a 5.35 metre reduced width at first and second storey at this stage, and advised that, although a noticeable improvement, further reductions would be required to reduce the overall harm to heritage assets to very low levels.

The revised scheme now presented to us maintains three three-storey dwelling houses. By comparison to the original scheme it reduces the width of the upper two storeys over 5.35 metres from that originally proposed (as seen at pre-application); it also reduces the ground floor width by 2.4 metres, and the building depth by 1 metre.

We acknowledge that this reduction has noticeably decreased the massing of the building by comparison to the previous application scheme. However, the overlay drawing still clearly shows a *considerable* increase in volume and riverside elevation





area compared to the current building, as it would comprise a broader ground floor proper, a broader first floor, and – most critically – a broader and full second storey rather than a hipped roof. Overall, this would still make a widely perceptible change to the prominence of development on this site in this sensitive riverside location.

We do acknowledge that improving the riverside walk and current tight views to the Grade II* bridge from the north east is likely to represent a small heritage benefit, but consider that this is minor in purely heritage terms.

Relevant policy

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a statutory duty on planning authorities to consider the impact of proposals upon listed buildings and their settings. Section 72 of the Act requires local authorities to have special regard to the desirability of preserving or enhancing the character or appearance of conservation areas.

Government guidance on how to carry out these duties is found in the National Planning Policy Framework 2021 (NPPF). Section 16 of the NPPF sets out how the historic environment should be conserved and enhanced. It makes it clear that avoiding or minimising conflicts between conservation of an asset and any aspect of a proposal is important (para.195). When considering the impact of a proposed development on a heritage asset, whatever the level of harm, local planning authorities should give great weight to preserving the asset's significance (para.199). Any harm or loss should require clear and convincing justification (para.200). Any harm caused to a heritage asset requires that harm to be weighed against the public benefits of the proposals (para.202).

The St Margaret's Conservation Area statement (post-2011) highlights some development pressures and opportunities for the area. The first problem highlighted in the area is "Development pressure which may harm the balance of the river and landscape-dominated setting, and the obstruction or spoiling of views, skylines and landmarks." The first listed opportunities for enhancement of the conservation area is the "Improvement and protection of river and landscape setting", and the "Preservation, enhancement and reinstatement of architectural quality and unity."

Richmond's adopted Local Plan policy LP3 reflects the main principles of the NPPF heritage policies, and stresses that (in part C) "all proposals in Conservation Areas are required to preserve and, where possible, enhance the character or the appearance of the Conservation Area". Policy LP18 relates to development along the river corridor, and stresses (in part B) that "development proposals within the Thames Policy Area should respect and take account of the special character of the reach as set out in the Thames Landscape Strategy and Thames Strategy as well as the Council's





Conservation Area Statements, and where available Conservation Area Studies.”

Your authority has recently consulted on a draft Supplementary Planning Document on Local Views, which identifies some local views as important in the area. View C6.1 in this document is one of these views, and takes in the river prospect from Richmond Lock bridge, looking towards the St Margaret’s Estate Conservation Area and the Old Deer Park. This proposal would sit within this view.

Historic England’s position and recommendations

This site is a sensitive one given its prominence on the Thames, its high visibility on the northern edge of a conservation area with a distinct riverside character, and its proximity to a Grade I registered landscape and Grade II* listed bridge.

We appreciate efforts made to reduce the overall volume of the building to date through the pre-application process, and note the small heritage benefit in slightly improving riverside views and the immediate public space to the front of the site. We also note that the materiality goes a small way towards breaking up the massing, but that this cannot override the impact of the remaining volume.

The building remains notably larger than that on the site at present. Its increase in breadth, height and overall prominence would still erode the sense of semi-rurality of the riverside within this conservation area. We remain of the view that it would more distinctly interrupt the separation and extension of the open river landscape provided by the current pleasure grounds and riverside green space, identified as important to the character of the conservation area, and in doing so have a negative impact on the listed bridge (given the importance of the riverside to its setting) and likely a small impact on the Grade I registered Old Deer Park.

Given that the proposal has reduced in scale compared to the previous planning application, we do consider this harm will also be somewhat reduced. However, we still consider that a meaningful level of less-than-substantial harm to the conservation area and Grade II* Lock Bridge will remain, and that a low level of harm would be caused to the Old Deer Park. We do not consider that this overall harm is at a low enough level to be outweighed by the small heritage benefits.

We suggest that a notable further reduction in the scale of the building would be required to limit the overall harm to very low levels. As per the NPPF, you should be assured that the harm has been limited, and not approve this scheme unless you consider the harm is outweighed by public benefits.

Recommendation



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Historic England

Historic England has some concerns regarding the application on heritage grounds, though acknowledges that the harm caused by the scheme would be at a lower level than that of the scheme previously submitted and withdrawn (22/3017/FUL). We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 195, 199, 200 and 202 of the NPPF.

In determining this application you should bear in mind the statutory duty of sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting, and to preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:
<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

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