

## 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:** Old Deer Park Working Group Mr. PETER WILLAN

**Address:** 7 The Green Richmond TW9 1PL

### Comments

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

**Comment:** The Old Deer Park Working Group (the Group) comprises representatives of The Richmond Society, The Kew Society, The Friends of Richmond Green, The Friends of Old Deer Park and The St Margaret's Estate Residents Association. This submission represents the joint response from the Group.

The group objects to the development as proposed on grounds of the serious and unjustified potential harm caused to the character, appearance and significance of the St Margaret's Estate Conservation Area as a designated heritage asset; to the settings and significance of the Old Deer Park Conservation Area, the grade II\* listed Richmond Footbridge, Lock and Sluices, and the grade I Royal Botanic Gardens – Old Deer Park Registered Park, as designated heritage assets; and to the buffer-zone of the Royal Botanic Gardens, Kew World Heritage Site, contrary to the relevant local, London-wide and national planning policies, and that such harm is neither balanced nor outweighed by the potential public benefits as required under the National Planning Policy Framework.

There should be no replacement unless the planning criteria relevant to this case are satisfied and we believe this has not been justified, notwithstanding the revisions to the scheme made since the original planning application (22/3017/FUL) was withdrawn in December 2022.

The height, width and overall mass of the building is over-development and this and its visibility significantly harms the prominent but sensitive rural riverside location. The development is in an MOL designated area. Incrementally the three storey development replaces and increases the scale of the existing two storey building and a low-set single-storey north (riverside) section and hipped roof. The angular roof design of the north elevation is incongruous with the semi-rural landscape setting.

The Richmond upon Thames Council's draft SPD on Local Views proposes the designation of a new view, C6.1, which is the long view from Richmond Lock and Weir (Grade II\*) encompassing (north) along the River Thames towards Isleworth Ait, including the winter view into the Old Deer Park and towards the King's Observatory and Kew gardens. The proposed development is prominent within this view which would be significantly harmed as a result. The SPD forms part of the Local Plan Publication version.

Flood risk mitigation. The site is within a flood plain and close to a tidal river. It is well recognised there is increasing flood risk from reduced use of the Thames barrier and increased excess water and challenging climate change. Flood projections continue to escalate the impact. In our view, residential development at this location is at high risk from flood damage with the harm significantly worse than faced by the original boathouse.