

Heritage Impact Assessment - Addendum

The Boathouse, Ranelagh Drive, Twickenham, TW1
1QZ – Application reference: 23/1856/FUL

Introduction

1. This Addendum Heritage Impact Assessment has been prepared by HCUK Group on behalf of The Boathouse Twickenham Ltd in respect to updated proposals for the external landscaping and heritage interpretation at the eastern entrance to the widened towpath and associated boundary treatment. The proposals are illustrated in the accompanying submission and are made in relation to live application reference: 23/1856/FUL.
2. This Addendum should be read in conjunction with the submitted Heritage Statement prepared by HCUK, by this author, and dated 6th June 2023 (version 5).
3. The conclusions reached in the original Heritage Impact Assessment were that the Proposed Development would on balance result in a degree of enhancement to the special character and appearance of the St Margaret's Estate Conservation Area by virtue of removing a detractor building and introducing 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.
4. By the same token the setting of the Richmond Footbridge (grade II*), Royal Botanic Gardens Kew World Heritage Site and registered park and garden (grade I) would be preserved, i.e., not harmed, with some enhancement of the setting of both. Thus Paragraphs 201 and 202 of the NPPF are not engaged. These conclusions remain unchanged.

Historic England's Consultation Response

5. The purpose of this Addendum is to examine the impact of more detailed proposals for the heritage interpretation of the Site and the effect this will have on the significance of relevant heritage assets. This step is being taken in part to address the consultation response from Historic England dated 26th July 2023. In contrast to HCUK's conclusion, Historic England found that the Proposed Development, in spite of appreciable reduction in scale, width and other improvements to the design compared to the withdrawn scheme (ref: 22/3017/FUL), would nonetheless result in, *"a meaningful level of less-than-substantial harm to the conservation area and Grade II* Lock Bridge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."*
6. The improvements to the Thames towpath and remodelling brought about by the recessed ground floor and boundary treatment of the replacement building are acknowledged by Historic England *"to represent a small heritage benefit, but consider that this is minor in purely heritage terms."* The benefit derives from the improved character of the adjacent section of riverside walkway and in the views of the grade II* Richmond Footbridge.
7. While HCUK disagree with an overall finding of some residual heritage harm, in part owing to a lack of emphasis on the negative impact of the existing building and current condition of the Site boundary treatment / general environment by Historic England (the Site is considered as ostensibly neutral in their consultation response), it is submitted that the potential for the Site's redevelopment to enhance this part of the conservation area through good quality architectural design and improvements to the public realm should not be overlooked.

Additional Heritage Benefits of the Proposed Interpretation and Nodal viewpoint

8. The submitted detailed proposals for the Heritage Interpretation at the eastern entrance of the Thames towpath utilise the concave nodal point carved out from within the Site boundary. This modification to the scheme provides a splendid opportunity to relay aspects of the former boathouse's history and its cultural value to the public in an interesting and engaging fashion. The circular plan of the nodal point resonates with the late 20th century history of the existing boathouse

as a recording studio. An engraved slate disc is to be set into the pavement detailing the artists and the albums they created at this venue. Set into the curved boundary wall will be a carved stone plaque engraved with a brief account of the Site's history, including its origins as a mid 19th century boathouse belonging to the Royal Naval Female School which stood a short distance to the west in a very grand building (St Margaret's House) from 1804 until the 1940s.

9. There is currently no sense in which this interesting history is communicated to the public and no appreciation of this aspect of the conservation area's historic development. Thus, bringing this to life in a positive and interesting way as part of the Proposed Development is undoubtedly an additional heritage benefit of the scheme. Historic England and the local authority are required to take this into consideration in line with paragraph 195 of the NPPF.
10. A further aspect of enhancement and heritage benefit relates to the position of the interpretation and nodal point at the east end of the improved section of Thames towpath. This location provides some of the best views to appreciate the grade II* Richmond Footbridge and introducing a nodal point where people will be invited to pause and reflect will have the incidental benefit of emphasising these views of the Footbridge and the importance of the structure as a feat of engineering and the architectural interest noted in section 4 of the Heritage Statement.
11. It is also noted that the developer intends to refurbish the jetty adjacent to the former boathouse with which it is associated in order to encourage and promote activity along this section of the River Thames.

Concluding Remarks

12. HCUK initially concluded that the proposed development would result in a net enhancement of the conservation area, Richmond Footbridge and Kew Deer Park (RPG) and there would be no residual heritage harm. With the additional heritage benefit of the Site interpretation and improvements to views of the Richmond Footbridge it is evident that the overall level of enhancement would be greater still.
13. Regarding Historic England's position it is submitted that the identified meaningful level of less than substantial harm would be lessened by the provision of these

additional heritage benefits such that any residual harm resulting from the scheme would be at the lower end of the less than substantial spectrum. Should that be the case the other public benefits of the proposal, as set out in the accompanying planning statement prepared by WSP, should be weighed against this less than substantial harm in accordance with paragraph 202 of the NPPF.

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