



Upper Tideway branch  
3 Ducks Walk  
Twickenham  
Middlesex TW1 2DD  
3<sup>rd</sup> September 2024

Development Management  
Your ref DC/Anita Vedi  
London Borough of Richmond upon Thames  
via envprotection@richmond.gov.uk

**Re: The Boathouse Ranelagh Drive TW1 1QZ 23/1856/FUL variation**

The River Thames Society (RTS) is a charity which aims to:

- Protect the natural beauty of the river, adjacent lands and buildings of historic interest
- Promote nature conservation
- Support and contribute to the efforts of other organisations with a similar interest in the river
- Preserve and extend amenities which allow and encourage the use of the river for all purposes

Comments made on behalf of the RTS are thus related to those overall aims which go from protecting and preserving what is currently best about the river, to enabling the public to have maximum benefit from what the river has to offer.

We continue to have **objections** to this application. There is a long and problematic planning history at this site which sits in the flood zone, a conservation area, close to a UNESCO world heritage site and to the grade II\* Richmond lock and sluices. Much is within MOL, and within 16m of a tidal river. Very exceptional circumstances would be required for any *de novo* development at this site.

This iteration is only the latest attempt to use the existing approved residential use to capitalise on the perceived value of the site. Built development started here years ago with a boathouse, as was appropriate for the river-bank location. Then by various changes in use, and retrospective applications for established use, we reach the current situation where this site seems to have become accepted for residential built development.

Although an improvement on the previous version, this application continues to be creative in attempting to make its case. The claimed footprint/volume of the existing build is enhanced by the inclusion of a low lying area to the South-east of the main building (see view 04 on p4 of the latest Design and Access document) for which there appears to be no existing explicit planning consent and which appears to be a sunken area enclosed by a thin flood defence barrier, mostly free space open to the air, a small part of which might have once contained air conditioning and ducting. Calculations of the existing built footprint/volume also include the garage, located

outside the MOL area. So it seems the true built footprint within MOL is being increased, as is the volume of residential development, making the new build materially larger than the existing enclosed building, particularly for the subset within MOL. This development does not pass the exceptional circumstances required for increased building within MOL. Any offer towards affordable housing would be insufficient mitigation.

The before/after views of the proposed build conveniently include the solid wall around the current roof terrace and ignore the safety barrier of the proposed roof terrace, which is misleading, even if construction were possible whilst retaining full transparency, since the occupants are bound to have potted plants, outside furniture and the like, as no doubt will be shown in subsequent sales brochures. Comparisons with withdrawn schemes are irrelevant at this stage. Compared to the existing, the mass of the building still appears excessive when viewed from across the river (the north elevation), from the bridge, or the Thames path (east and west elevations), remaining inappropriate for this conservation area.

The increased width of the Thames path is welcome, but still leaves this short section as probably the narrowest pinch-point on the path between Isleworth and Twickenham.

We note remaining issues around lighting the Thames path and lack of electric charging points for cars, and also the lack of contingency arrangements for cars during flood events. Upgrading the adjacent mooring seems to be being contemplated, and this we would encourage: ideally those plans should be looked at together with the current bankside development.

**In summary**, the comments made on the last version of this application remain valid. Even without the second story, the mass of the new build is excessive. The case for increased size of residential building within MOL has not been made. Any new building within the flood zone is problematic and it would be wise to await revised plans from the LBRuT in response to the latest EA flood risk projections.

Mrs Hilary Pereira  
Chair UT branch of RTS  
Hilary.pickles@doctors.org.uk