



Historic England

Miss Anita Vedi
London Borough of Richmond
Planning, Environment Directorate
Civic Centre
44 York Street
Twickenham
TW1 3BZ

Direct Dial: 020 7973 3762

Our ref: P01562924

4 September 2024

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 15 August 2024 regarding further information on the above application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application.

Historic England Advice

Historic England commented on several earlier iterations of this scheme at both application and pre-application stage, 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. We consider that the changes made have now reduced the harm, but not eliminated it.

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 sits on the site of an earlier, smaller boathouse and works. The building is not of architectural merit and 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 is a reasonably reticent presence in the landscape.

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



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.



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 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, and together these create an evocative place, important to the character of this part of London.

Impact of the proposals

The scheme entails the demolition of the present building and construction of a terrace of three two-storey houses on the site. The building would be larger than the current building, extending several metres further to the east, with picture windows and balconies to the front elevation. The scheme also entails reworking and slightly widening the riverside path in front of the property.

The previous iteration of this scheme was of three storeys, and would have appeared very noticeably larger than the current building in views from, along, and across the river. The height in this scheme made itself prominent by rising above much of the prevailing treeline, and the building read as a set of townhouses which was at odds with the character of this part of the river. We considered this scheme would have caused harm to the conservation area and to the Grade II* bridge which should form the focal point of this riverside area.

The current scheme is two storeys rather than three, sitting below the treeline. Its design has been simplified, with less of a vertical emphasis. The height of the boundary wall has been reduced to limit the additional hard planes to the riverside elevation. The overall bulk of the building is still larger than the current building, and this will increase the prominence of built form, unrelated to the workings of the river, hard up against the waterway. This is counter to the prevailing character which relies on the dominance of the river and its verdant setting. However, at this scale and with a subtler design we now consider the harm it would cause to the conservation area and Grade II* lock bridge would be fairly low. Because it would sit below the treeline with intervening tree screening in longer views, we consider the impact on views from within the Old Deer Park would likely be negligible.



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk

As stated in our previous correspondence in response to past iterations of this scheme, we consider the improvements to the river path could provide a small heritage benefit through opening up views in the conservation area and providing interpretation. We consider some residual harm would still remain, even after balancing this benefit against the less-than-substantial harm already identified, but we would consider this to be at a low level.

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 2023 (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.201). 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.205). Any harm or loss should require clear and convincing justification (para.206). Any harm caused to a heritage asset requires that harm to be weighed against the public benefits of the proposals (para.208).

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."

The adopted Richmond 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."



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



Richmond Council consulted in 2022 on a draft Supplementary Planning Document on Local Views, which identifies some local views as important in the area. This has not yet been adopted but is being taken forward as part of the Local Plan review process. 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 consider that, as laid out above, the changes to the scheme have clearly reduced the harm it would cause, though they have not removed all harm. We consider that some heritage benefits could arise from the improvements to the path and new interpretation, as long as suitable materials, lighting and interpretation panels were controlled by condition, but we do not consider this would entirely outweigh the harm. The harm that remains would now be, in our view, at the lower end of the scale of less-than-substantial harm.

We advise your authority to weigh the remaining harm against any public benefits of the scheme, giving great weight to heritage impacts as required by the NPPF.

Recommendation

Historic England does not object to the proposal, but considers that the scheme will still cause some harm. The harm as identified in our advice above should be weighed against the public benefits of the proposal in order for the application to meet the requirements of the NPPF. In determining this application you should bear in mind the statutory duty of sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special regard to preserving the significance of listed buildings and the character or appearance of conservation areas.

Your authority should take these representations into account in determining the application. If there are any material changes to the proposals, or you would like further advice, please contact us. Please advise us of the decision in due course.

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



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



Historic England

Kathy Clark

Principal Inspector of Historic Buildings and Areas

E-mail: Kathy.Clark@HistoricEngland.org.uk



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.