

Pontoon & adjacent land at Richmond Bridge Pier – Summary of Heritage Evidence

Introduction

- 1.1 My name is Nick Collins and I am a Director at Portico Heritage Ltd. I hold an honours degree in Land Management and have a Masters in Historic Conservation. I am a member of the Royal Institution of Chartered Surveyors and the Institute of Historic Building Conservation.
- 1.2 I was an Inspector of Historic Buildings & Areas at Historic England for 8 years and prior to this was Conservation Officer at the London Borough of Bromley.
- 1.3 I was appointed by the appellant in respect of this Appeal in November 2023. I have visited and inspected the appeal scheme site and its surroundings. I have carefully assessed the appeal scheme and the reasons for Enforcement.
- 1.4 This Proof of Evidence has been produced particularly to address Ground 'a' of the Appeal – that planning permission should be granted for what is alleged in the notice.

Historical development of Richmond

- 1.5 The history of Richmond is well documented and is summarised in the Council's Conservation Area Appraisal.
- 1.6 Historic images from the 19th century illustrate the historic activity along the Thames in the vicinity of Richmond Bridge. These images, reproduced from the Council's Conservation Area Appraisal, illustrate the activity found on the eastern banks of the Thames, with the town behind, in contrast with the more rural context of the western bank.
- 1.7 Today, the eastern side of the river is dominated by the Richmond Riverside development which, designed by Quinlan Terry Architects between 1984-87, skilfully combined a series of Grade II listed structures with a large development of offices, flats, shops, two restaurants, community facilities, underground car parks, an urban square and riverside gardens.
- 1.8 In front of the development a formal riverside terrace steps down to the river alongside four boathouses that project forwards of 10,11 & 12 Bridge House, alongside Bridge Street and the Bridge itself. On top of the boathouses is a restaurant/caf  with seating and covered pergola structures.
- 1.9 Further to the north, the Grade II listed 18th century former warehouse is now a restaurant/bar on the tow path and beyond is the Grade II listed White Cross Hotel.

Heritage Context

1.10 The pontoon is located on the River Thames, within the Richmond Riverside Conservation Area. The pontoon itself is not listed however it is moored within the setting of a number of statutory listed buildings. The following are those that I believe are most relevant in terms of their setting to the appeal site:

- Richmond Bridge : Grade I
- 10, 11 & 12 Bridge Street : Grade II
- (former) Palm Court Hotel : Grade II
- Warehouse on Water Lane : Grade II
- Richmond War Memorial : Grade II
- White Cross Public House – Grade II

Richmond Riverside Conservation Area

1.11 The character and appearance of the conservation area is articulated by the Council in their Conservation Area Appraisal (adopted November 2023).

1.12 The two sides of the River Thames are very different in character, particularly in the immediate vicinity of the appeal site with the eastern side noted for its '*well ordered urban landscape*' with the west bank having a more '*semi-rural character*'.

1.13 The Appraisal notes that '*the Thames is a major contributor to activity in the area and today adds to an active daytime and night-time economy, housing a number of businesses including many bars and restaurants. Its association with leisure remains strong with public gardens and towpaths forming a popular destination for pedestrians, joggers, and cyclists. The area is well connected to its surroundings, with the riverfront walkway providing access to residences, pubs, terraces, various greens, as well as multiple lanes and footpaths through Richmond. Much of the Riverside was restored in a neo-Georgian style by the architect Quinlan Terry from 1984-87*'.

1.14 Richmond Bank is further described: '*Richmond Bridge is the gateway to the town from the west. It allows many fine views and vistas of the river environment, both into the Conservation Area and south towards Richmond Hill. It provides a dramatic and high-quality image to the town. However, views from the bridge are dominated by the Richmond Riverside development of 1988 by Quinlan Terry. A formal and well-maintained stepped riverside terrace in front of the development emphasises the river as an open space for popular enjoyment.*

Listed Buildings

1.15 The listed buildings in the vicinity of the site clearly have special architectural and historical interest and thus significance. Of most relevance to this appeal is the setting of these assets and how setting contributes that significance. In most cases the setting of

each of the buildings is inter-related – all forming an integral part of the character and appearance of the conservation area as articulated previously. Perhaps the most important is Grade I listed Richmond Bridge.

Richmond Bridge : Grade I

- 1.16 Richmond Bridge, now London's oldest remaining river crossing, is visible in long views from Richmond Railway Bridge 'downstream' and Terrace Garden 'upstream'. In terms of its setting, due to the open nature of the river its elegant architectural form can be particularly appreciated from the river towpath, the stepped terraces of Richmond Riverside and from the river itself. The buildings and character of both sides of the river also form part of the bridge's setting and contribute to its significance, including the economic vibrancy of the downstream eastern bank – helping to reinforce the bridge's 'gateway to Richmond' function – which is also reinforced by the contrasting semi-rural and suburban nature of the east bank.
- 1.17 Views across the bridge from east and west also contribute to its setting – particularly those looking towards Richmond Town Centre – even though the river might not be visible the town is visible beyond and the bridge is a recognised and known 'gateway' to the town.
- 1.18 The bridge's setting, particularly from the tow path, has often been slightly obscured, or at the least seen in the context of other rivercraft, pontoons and river-related activity. The Peggy Jean Barge is a permanent, consented, presence along the riverbank and thus forms part of the bridge' setting.
- 1.19 Different elements of the bridge's significance are revealed at different points within its setting. For example, longer views allow for an appreciation of its overall graceful classical form spanning the river from bank to bank; views across the bridge allow for an appreciation of its 'gateway' function and views close up on the tow path allow for an appreciation of its architectural detailing.

The contribution that the site makes to setting of the bridge

- 1.20 The Peggy Jean barge and pontoon are positioned in close proximity to the downstream side of the bridge and sit within its downstream setting and the site forms part of the setting of the bridge.
- 1.21 The historic and contemporary images show that it has often been the case that rivercraft and boats have been moored in this location and therefore views of the bridge will often have been partially obscured.
- 1.22 As referred to earlier, at the time the mooring of the barge as a restaurant was consented it was felt by Officers that its presence, alongside the pontoon, would not detract from the setting of neighbouring listed buildings including Richmond Bridge. The barge is a clear and consented presence within the setting of the Bridge.

1.23 The presence of the umbrellas (and previously the 'enclosed sides') has obscured some views of the bridge, however this only has a detrimental impact on an ability to appreciate the significance of the bridge in a number of limited positions and has been considerably reduced with the reduction in their number, size and colour.

The Reasons for Enforcement Notice

1.24 With regards the historic environment, the reasons given for issuing the notice are as follows:

The pontoon, as altered, appears as a dominant and unsympathetic addition to the riverside, due to its size being disproportionate to similar structures within the Conservation Area and the use of large umbrellas and transparent plastic covers to enclose the area, representing a poor-quality design, which fails to preserve or enhance the character or appearance of the Conservation Area. The pontoon also affects the setting of the Grade I listed Richmond Bridge, due to the poor-quality design and materials and the increased size and therefore dominance on river frontage, it negatively affects the setting of that listed building. The alterations to the pontoon result in a dominant and incongruous structure on the river frontage, which negatively affects the conservation area and grade I listed Richmond bridge. The alterations to the pontoon amount to less than substantial harm to the designated heritage assets however there are no public benefits attributable that outweigh this harm. Accordingly, this development does not comply with the local Plan Policy LP3, Draft Local Plan Policy 28 or the National Planning Policy Framework.

Summary of Impact

1.25 With regards the physical structure the pontoon had raised elements at its downstream and upstream end.

1.26 Since that time the pontoon, when in situ, has been used by a number of groups as a base for their river-related activities and a location to moor boats as well as its restaurant use.

1.27 The existing pontoon rises to 1.37m above water level at either end. Although a larger proportion of the pontoon is at this higher level this is still considerably lower than the permanent 2.60m highest point of the former structure on the pontoon.

1.28 Since the pontoon was moored, consent was subsequently granted in 1992 for the mooring of the Peggy Jean barge, as a restaurant, alongside the pontoon. Council Officers regarded the use of the Peggy Jean barge as a restaurant in this location, alongside the pontoon, to be a positive contributor to the character and appearance of the conservation area that would not detract from the setting of neighbouring listed buildings including Richmond Bridge.

- 1.29 At the time that consent was granted for the mooring of the barge in 1992, Council Officers commented '*the barge would be tucked between the permanently moored pontoon and the hard edge of the river bank...the barge is likely to enhance the river life and scene...it is felt that the...barge would make a positive contribution to the character and appearance of the conservation area and would not detract from the setting of neighbouring listed buildings including Richmond Bridge*'.
- 1.30 Since the Enforcement Notice has been served, the plastic sides have been removed from pontoon, the number of umbrellas has been reduced, their size reduced and a more subdued colour used for the canopies – all of which can be lowered out of hours.

Restaurant Use

- 1.31 I do not believe that the part-use of the pontoon for restaurant use has any impact on the character and appearance of the conservation area, or the setting of any of the surrounding heritage assets – for reasons similar to those given by Council Officers in 1992 – the use adds to the riverside environment and activity at this particular location, which is also recognised in the Council's Conservation Area Appraisal.
- 1.32 The restaurant contributes to the vibrancy of this part of the town centre which is both historic (White Cross Public House) and more recent with the Riverside development, terraces, cafes and restaurants.

Alterations to the pontoon, tables, chairs & railings

- 1.33 Whilst the alterations to the pontoon have led to a physical change to the pontoon itself, the impact on the setting of surrounding heritage assets is minimal. In most views the pontoon is only seen obliquely and obscured by the barge in its foreground, and where it is seen 'full-length' from the western side of the river or Richmond Bridge it is partially obscured by the moored rivercraft and allows for unencumbered views of the surrounding heritage assets. The presence of railings on a pontoon is not an unusual sight.
- 1.34 Similarly the presence of tables and chairs and people using the pontoon – either for river or restaurant related uses is not incongruous and does not have a harmful impact on the character of the conservation area or the setting of nearby heritage assets – when visible, it is seen in the context of the riverbank terrace, the boathouses and cafes.
- 1.35 I do not believe that these elements cause harm to the character and appearance of the conservation area or the setting of any of the surrounding heritage assets.

Umbrellas & transparent plastic sides

- 1.36 It was recognised that the use of the transparent plastic sides along with the umbrellas did have a dominant and distracting impact on the character and appearance of the conservation area and the setting of nearby heritage assets, most notably Richmond Bridge – particularly with their bright colour.

1.37 The removal of the transparent plastic sides has reduced this impact considerably. However, even with the removal of the transparent plastic sides, it was recognised that the umbrellas still appeared relatively prominently within some of the views from and towards Richmond Bridge and caused an element of less than substantial harm at the lower end of the scale, to the character and appearance of the conservation area, a number of the listed buildings within it, and the setting of Richmond Bridge.

1.38 The removal of further umbrellas at the upstream end of the pontoon, the reduction of the height of the remaining ones and a change of colour to an oyster white has reduced this low level of harm to a nominal level.

1.39 This less than substantial harm needs to be weighed against the public benefits of the proposals.

National Planning Policy Framework

1.40 In respect of the National Planning Policy Framework this report provides a description of the significance of the heritage assets potentially affected, including any contribution made by their setting as required by paragraph 207.

1.41 In terms of paragraph 214 it is common ground between the appellant and the Council that the proposals do not cause substantial harm to any designated assets or their setting.

1.42 With regards paragraph 215, whilst it is accepted that there was an element of less than substantial harm caused by the umbrellas and side panels, this has been considerably reduced by the removal of the side panels and the removal of two umbrellas closest to the bridge. The remaining harm is caused primarily through the presence of the umbrellas on the pontoon acting as a 'distraction' to appreciating the setting of the surrounding heritage assets.

1.43 I believe that this less-than-substantial harm is at the lower end of the scale and only relates to the umbrellas and not to the use – which contributes not only to the vibrancy of the area but also allows for the continued use of the pontoon for river-orientated uses – or the pontoon itself which, even as altered does not have a detrimental impact on the setting of any heritage assets.

1.44 If it is agreed by the Inspector that an element of less than substantial harm is caused, this should be weighed against the public benefits, including where appropriate, securing optimum viable use. The public benefits of the scheme are addressed in the Planning Statement.

Richmond Local Plan

1.45 With regards to the Council's Local Plan Policy 29 it was established in 1992 that this part of Richmond Town Centre was an appropriate place for restaurants and commercial activity. I do not believe that the part-use of the pontoon as a restaurant, as well as all of the other uses and activities that take place on the pontoon have a detrimental impact on

the character of the conservation area or the setting of surrounding heritage assets. On the contrary it would appear to add to the activity and character.

- 1.46 Similarly, the alterations to the pontoon alone, as well as the chairs and tables, do not detrimentally impact the setting of any surrounding heritage assets – it leads to a small visual change that does not adversely affect an appreciation of heritage significance.
- 1.47 With regards the umbrellas on the pontoon, whilst this may be regarded as causing an element of less than substantial harm on the lower end of the scale to the character of the conservation area and the setting of surrounding listed buildings, most notably Richmond Bridge, this has been considerably mitigated since the Enforcement Notice was served and should be considered in the context of the public benefits identified, including the continuation of other river-based activities from the pontoon itself.

Alternative Proposals

- 1.48 In considering the potential heritage impact of the identified options, the approach to my assessment is articulated in the previous section – this identifies that the only element of the proposals that cause a low level of less-than-substantial harm to any heritage assets is the presence of the umbrellas.
- 1.49 Therefore, in respect of all Options outlined, a reduction in the number of umbrellas will further reduce the small level of less-than-substantial harm caused.
- 1.50 Whilst their total removal from the pontoon would lead to a situation where no harm is caused at all by the part-use of the pontoon for restaurant use in association with the Peggy Jean barge, their presence at the downstream end of the pontoon has an almost *de minimis* impact as they are seen within the context of those already permitted on top of the Peggy Jean barge.

