

# CLIVE WREN Architect & Landscape Designer

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**PINS Ref: APP/L5810/V/03/1128907 & 1128908**

**Applicant:** London Borough of Richmond upon Thames

**Site:** Twickenham Swimming Pool, The Embankment, Twickenham

**Proposal:** Demolition of pool building. Hard and soft landscaping of resultant footprint. Partial clearance of poolside lido to form park and children's play area secured by fencing. Steps from lower to upper area. Short term scheme pending future development envisaged 5 year duration.

**PROOF OF EVIDENCE** of Clive William WREN D Arch (Kingston) RIBA

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## 1.0 INTRODUCTION

1.1 I am a chartered architect and a landscape designer with 29 years' experience in the public and private sectors. From 1974 to 1981 I was employed as an architect/planner by British Waterways with nationwide responsibilities. Since 1981 I have been the principal of a private practice which maintains a specialism in the development of waterside land and the restoration and conversion of old structures and buildings. I have been a boat owner, river user and visitor to Twickenham Riverside for more than 20 years.

1.2 I live in Hammersmith and I am a member of the Hammersmith and Fulham Historic Buildings Group. As part of its campaign to conserve the character of the historic environment in that Borough, the Group surveyed and compiled a Local List of Buildings of Historic, Architectural or Townscape Interest. The List includes the Statutory List, buildings on the Local Register in the UDP and additional buildings identified by the Group as worthy of retention.

### The Twickenham Riverside Terrace Group (TRTG) scheme

1.3 I first became involved with the application site when Ken Hathaway, a local architect and the original author of the TRTG scheme, died. I was asked, at a few day's notice, to present his scheme to the planning committee meeting on 19 July 2001. This I did and permission was granted subject to conditions. The Terrace Group scheme, which involves partial demolition of the pool building, will be described fully by the TRTG at the inquiry.

### The Dawnay Day scheme

1.4 On 6 November 2001 I objected to the Dawnay Day applications (**A1.1**). Although the Council was minded to grant planning permission, the applications were called in and dismissed in December 2002 by the Secretary of State because the applicants failed to provide an Environmental Assessment.

### Application to list the pool building

1.5 On 16 January 2003 I objected (**A1.2**) to the Council's decision to implement its short-term scheme option B, now the subject of this Inquiry. Amongst the other objections were letters from Andreas Sarhage, a German developer, dated 21 January 2003 (**A1.3**) and Michael Landolt, an architect and landscape architect, dated 15 February 2003 (**A1.4**). These letters opened my mind to the qualities of the pool building and the benefits of repairing and converting the whole of it to new uses.

1.6 On 24 April 2003 I applied jointly with Ron Chappell, a structural engineer, to the Department for Culture Media and Sport (DCMS) for the pool building to be listed (**A1.5**). On

4 June 2003 the DCMS informed me (**A1.6**) that the pool building was not considered to have sufficient special architectural or historic interest to merit listing. A copy of English Heritage's advice dated 6 May 2003 (**A1.7**) was enclosed.

#### The called-in applications

1.7 On 16 May 2003 I objected to the Council's applications for the short-term scheme (**A1.8**). On 9 June 2003 I informed the Government Office for London (GOL) of the DCMS decision and sustained my objections to the Council's applications (**A1.9**). On 22 July 2003 I sustained my objections to the applications in response to amendments that had been made (**A1.10**). In a letter dated 3 October 2003 I was informed by GOL that the applications had been called in.

#### UDP Modifications Inquiry

1.7 I appeared on 16 October 2003 with the TRTG and Twickenham Society Group at the UDP Modifications Inquiry against the Council's revisions to Proposal T1 in respect of the application site. My closing submissions (**A1.11**) were forwarded to the Inspector on 2 December 2003.

## 2.0 THE POOL BUILDING

### Background

2.1 The pool site was purchased in 1924 for public walks and pleasure purposes by the then Twickenham Urban District Council with a loan from the Ministry of Health. On the land stood Richmond House which was used by the community until it was demolished in 1928. Following a public petition, the swimming pool was built in 1934. It opened with ceremony on 13 April 1935, closed for repairs in 1981 and has remained so. Although money was allocated for repairs, only a part was spent on the café and caretaker's house (built after the Swimming Pool) which have since been used as a play school and offices by voluntary organisations.

### Setting

2.2 The pool building occupies a prominent position on The Embankment in the Twickenham Riverside Conservation and Thames Policy Areas, opposite Eel Pie Island and next to London's prime area of Metropolitan Open Land, the River Thames (see photographs at **A2.1 & A2.2**). The present use of The Embankment as part of a one-way traffic system and for vehicle parking spoils an otherwise spectacular setting. Traffic and parking intrude on an appreciation of the building from the riverside (see photograph at **A2.3**).

### Design & Layout

2.3 The pool was designed by A L Tamkin ARIBA under the auspices of the Borough Engineer and Surveyor, Gilbert R King. A French company that pioneered the use of reinforced concrete, Edmond Coignet Ltd, acted as consulting engineers. It was built in the Art Deco style which was internationally fashionable at that time.

2.4 The pool complex is an integral design. It comprises the 2-storey pool building (about 55 x 7 – 12 m) arranged symmetrically around a foyer and double staircase, with plant rooms at embankment level and changing rooms, toilets and showers on the first floor. The building gives access at first floor level to an outdoor pool (about 50 x 17 m) with two shallow ends and a central deep area and diving platform, all constructed of reinforced concrete.

2.5 At embankment level the external walls comprise exposed aggregate concrete blocks or panels alternated with courses of red brickwork. At first floor level they comprise red brickwork with tile creasings over the windows. At roof level there is a slightly inset brick-on-end parapet.

2.6 The symmetrical layout is reflected in the elevations. On the river elevation sets of 3 and 7 windows at embankment and first floor levels are arranged each side of a projected

central section featuring a coffered reinforced concrete canopy, higher and more elaborate parapet walls, 3 large windows with diagonal glazing bars, and a pair of ornamental “Olympic torch” flag pole holders (see photograph at **A2.4**). The central section of the pool elevation features semi-circular “Roman” arches.

2.7 Internally the staircase landing and first floor changing rooms with their large windows and finely plastered ceilings and cornices are light, airy and spacious in a distinctive Art Deco manner. They enjoy good sunlight and excellent views up, down and across the river (see photograph at **A2.5**).

2.8 Boundary walls on the river elevation are constructed of the same brickwork as the building with Art Deco railings.

### Construction and Condition

2.9 I inspected the pool building on 14 September 2001 and 7 January 2004, accompanied on both occasions by a structural engineer and a building estimator or quantity surveyor. I have also examined copies of some of the original construction drawings, a full set of which should be made available to the Inquiry by the Council.

2.10 The building comprises reinforced concrete retaining walls, reinforced concrete ground floor slab, reinforced concrete hollow clay pot first floor and main roof, and timber rear and end-bay roofs. It has a concrete-encased steel frame infilled or clad with brickwork and exposed aggregate concrete blockwork.

2.11 The pool building has been sorely neglected. Small trees are growing from parts of the structure and defective rainwater goods and roof coverings have allowed water to penetrate. Extensive repairs are necessary, but the building is robustly constructed and appears, for the time being, to be capable of economic refurbishment to meet current building standards.

### Accommodation

2.12 The net floor area of the building is some 930 m<sup>2</sup> (390 m<sup>2</sup> at embankment level, 540 m<sup>2</sup> at first floor level). The frame construction affords clear spans and uncluttered spaces which can be left open or be subdivided with lightweight partitions. It also allows new larger openings to be formed in the walls if required.

2.13 The floor at embankment level is some 0.88 m below statutory flood defence level which, at this location, is 6.02 m above Ordnance Datum (Newlyn). There is a consequent risk of flooding when there are high spring tides and heavy flows of land water, although, at

present, flood water rarely reaches the nearby kerb. Flood levels can be predicted and the Environment Agency operates a warning system. Several proprietary flood defence systems are available comprising demountable or free-standing structures which can be installed quickly when required.

2.14 At embankment level the building is suited to subdivision with new separate openings to the embankment. Without flood defences, suitable uses would be boat storage and associated workshops, as at Richmond Riverside. With flood defences, river or community-related retail and office uses would be appropriate. The first floor of the building is suited to being kept as large spaces for restaurant, assembly, recreation or cultural uses (see attached drawing at **A2.6**).

2.15 It is anticipated that the cost of repairing and converting the pool building to provide retail space at embankment level and a restaurant at first floor level would be less than £1 million, excluding professional fees, statutory charges and VAT. The cost of providing new equivalent accommodation would be some 40 - 50% greater. A budget cost estimate will be provided at the Inquiry.

#### Architectural & historic interest

2.16 Abortive comprehensive redevelopment proposals and a policy of neglect over the past 20 years have blighted the application site and created a mind-set that the pool building is in some way to blame and that it should be demolished. Whereas, in fact, it was erected almost 70 years ago with civic pride - all that has changed is the building has been allowed to become vandalised and semi-derelict.

2.17 The pool building is one of the few public buildings of its period to be found alongside the upper reaches of the tidal Thames. It relates to other Art Deco buildings in Twickenham Town Centre and immediately upstream of the site, but it is the only building of its period on The Embankment. As a major public building, it sits at one end of The Embankment in juxtaposition with St Mary's Church at the other.

2.18 The acquisition of the site in 1924 and the construction of the swimming pool in 1934 marked a significant change in land use next to the river from private residential and commercial to public recreation and leisure. The pool was built at a time when public lidos were fashionable and people wanted to forget the recent world war and the economic depression that followed. It was a temple dedicated to health, fitness and pleasure for everyone.

2.19 The classical symmetry, scale and simplicity of the composition give the building grandeur and repose. The Art Deco styling, especially the diagonal fenestration and more elaborate detailing of the central portion of the river elevation, enliven the facade. The quality of the external brickwork, ironwork, and other surviving elevation details, and the internal spaces on the first floor are also distinctive. The pool building addresses the river in a positive and appropriate way, and is very much of its time and place.

2.20 English Heritage's advice (**A1.7**) acknowledges that the location and Art Deco facade give the pool building "an appropriate joie de vivre". It also states that the facade is similar to the Tinside Pool in Plymouth, which is listed. The conclusion to be drawn from the advice is that the pool does not have sufficient special architectural or historic interest to merit national listing, but that it nevertheless has some quality and distinction.

2.21 Such a conclusion is supported by the Ancient Monuments Society in its letter dated 8 January 2004 (**A1.12**) which says that the pool building is "of some architectural distinction" and that it has "clear quality". It is also supported by Save Britain's Heritage in its letter dated 12 January 2004 (**A1.13**) which says: "This is a handsome building of local interest which forms part of the history of the area.....".

2.22 The 1991 Inquiry Inspector's report found (at 11.4) that "The developed part of the site is, on the face of it, undistinguished.....". In that the pool building is neither remarkable nor eminent, such a finding is consistent with English Heritage's advice not to list. Little or no expert evidence appears to have been heard at that inquiry about the architectural merits of the pool building or the feasibility of converting it to new uses.

#### Relationship with the conservation area

2.23 The pool building makes a positive contribution to the character and appearance of the conservation area by virtue of its architectural quality and distinction, its relationship with the river, and its historic association with public use of the riverside for leisure and recreation. It relates well to other buildings in the conservation area by virtue of its materials, window proportions, height and limited depth, a feature commented upon by the 1991 Inquiry Inspector at 11.8 of his report.

2.24 The pool building is not domestic in scale, but then it is recognisably a public rather than a private building. Presumably this was taken into account when the conservation area was originally designated in 1969 and the swimming pool was still in use.

2.25 The blight arising from disuse and neglect of the pool site and the public realm is identified in the conservation area study and Thames Landscape Strategy as the major

problem in the conservation sub-area. This does not justify demolishing the building. Rather, it demands urgent action to carry out repairs and improvements.

2.26 A refurbished pool building accommodating public and river-related facilities with environmental improvements would regenerate the area and stop the blight. The pool building could thereby make an even greater contribution to the character and appearance of the conservation area.

#### Relationship with redevelopment proposals

2.27 A refurbished pool building containing new public and river-related facilities would, in itself, constitute a beneficial redevelopment of that part of the site in accordance with proposal T1 of the UDP. The attached drawing at **A2.7** shows how it could relate to redevelopment of the rest of the site, including adjoining land at the rear of King Street. The scheme would:

- divert traffic and vehicle parking from The Embankment to a widened and extended service road running between Wharf Lane and Water Lane
- reclaim The Embankment as attractive and usable public open space e.g. for markets, concerts, street theatre, eating, drinking etc
- use the swimming pool area for a sports and/or cultural facility and/or a landscape feature as a public asset under the auspices of "The Twickenham Challenge". (One of the bidders wants to build a swimming pool)
- create public open space to the rear and sides of the pool building, linking the King Street buildings visually and physically to the river and the riverside
- redevelop and/or refurbish as enabling development the properties fronting King Street which would benefit from views of the open space and the river
- redevelop as enabling development the car park and corner site at the bottom of Water Lane for housing and/or commercial uses
- construct boat landing facilities on the river frontage

2.28 From such a scheme, a development framework could be evolved that:

- enables immediate and positive progress to be made
- retains community and voluntary uses and involvement in the site
- establishes the basis for a public, private and voluntary partnership
- allows redevelopment to occur incrementally
- encourages imaginative designs to emerge for the various components.

### 3.0 THE PROPOSALS

#### Demolition of the pool building

3.1 Demolition would result in the loss of a building of quality and some architectural distinction, which makes a positive contribution to the conservation area, could provide a significant amount of accommodation for public and river-related uses, and could help regenerate the area in the short- and long-term. Without acceptable and detailed plans for redeveloping the site as a whole, and a commitment to implementing them, demolition would create a hiatus that would be harmful to conservation and Thames Policy area objectives.

3.2 It would be more cost effective to repair and convert the pool building than to build new equivalent accommodation. The likely scenario with a redevelopment comprising entirely new buildings would be, either few, if any, public or river-related facilities or, a larger scale development than would otherwise be contemplated to subsidise their provision. This is how the Council envisaged the situation in its Proof of Evidence (at 6.11) to the UDP Modifications Inquiry (**A1.14**).

3.3 Keeping the pool building may be the only acceptable way of achieving the kinds of uses considered desirable at this location. In this respect, demolition of the pool building could prejudice the long-term redevelopment of the site as whole.

#### Landscaping of the building footprint

3.4 There is no indication of how support would be maintained to the retaining wall if the pool building is presently acting as a prop. If buttressing would be provided, this should be shown in the proposals so that the implications on design, layout, appearance and amenity can be assessed.

3.5 The Planning Statement (page 2, paragraph 5) purports that there would be enhanced views across the river to Eel Pie Island. However, it is difficult to see why anyone wishing to enjoy views of the river would choose to sit some 30 metres from the bank, separated by rows of parked cars, when there are riverside seats with panoramic views. More likely the proposed seating area would be used for purposes other than looking at the river, which could simply perpetuate the sense of blight at that end of The Embankment.

#### Fencing of lido and playground area

3.6 Demolishing the pool building creates the need to erect a fence in one of the most prominent places possible. Decorative treatment is likely to draw attention, especially from graffiti artists, rather than mitigate the appearance of the fence, and it is likely to prove difficult to maintain. In my opinion, the proposed fence would be an unattractive and

dominant feature that would be harmful to the character and appearance of the conservation area.

#### Children's play area

3.7 Desirable though it might be to provide children's play facilities, they could hardly be designed to be more prominent, being sited on high ground, enclosed by an open mesh fence and visible from many different directions. The play area is unrelated to the river or its surroundings as a use or as a design, and would fail to preserve or enhance the character or appearance of the conservation area.

3.8 If the pool building were retained, the play area and associated fencing would be less prominent. It would, however, remain questionable if this is the best location for such a facility, being remote from other amenities and centres of activity on the riverside.

## 4.0 PLANNING CONSIDERATIONS

### Planning Policy Guidance Note (PPG) 15

4.1 There is a reminder at paragraph 4.14 that a local planning authority is required under Section 72 of the 1990 Act to pay special attention in the exercise of all its planning functions under the Planning Acts to the desirability of preserving or enhancing the character or appearance of a conservation area. Under Section 215 of the Town and Country Planning Act 1990 the Council has powers to secure the tidying up of any land including buildings. Under Sections 47, 48, 54 and 76 of the Planning (Listed Buildings & Conservation Areas) Act 1990 it can require the repair of unoccupied key buildings in conservation areas. The question arises, therefore, why appropriate action has not already been taken to stop the blight.

4.2 Paragraph 4.26 states that the prime consideration in determining a consent application should be the desirability of preserving or enhancing the character or appearance of the conservation area in question. It also says account should clearly be taken of the part played in the architectural or historic interest of the area by the building for which demolition is proposed.

4.3 Paragraph 4.27 states that there should be a general presumption in favour of retaining buildings which make a positive contribution to the character or appearance of a conservation area and that proposals to demolish such buildings should be assessed against the same broad criteria as listed buildings at paragraphs 3.16-3.19 of PPG15.

4.4 Paragraph 3.16 states that proposals for demolition should be fully scrutinised before any decision is reached: that the destruction of historic buildings is seldom necessary for reasons of good planning. More often it is through neglect or the failure to make imaginative efforts to find new uses or to incorporate the historic buildings in new development.

4.5 Paragraph 3.17 states that consent to demolition should not be given unless there is clear and convincing evidence that all reasonable efforts have been made to sustain existing uses or find viable new uses, and that these efforts failed; that preservation in some form of charitable or community ownership is not possible or suitable; that redevelopment would produce substantial benefits for the community which would decisively outweigh the loss resulting from demolition. Consent to demolition should not be given simply because redevelopment may be economically more attractive to the developer than repair and re-use of the building.

4.5 Paragraph 3.19 states that where substantial demolition is proposed the following considerations should be addressed by the planning authority:

- i the condition of the building and the cost of repairing and maintaining it in relation to its importance and to the value derived from its continued use
- ii the adequacy of efforts to retain the building in use, including compatible new uses and the offer of unrestricted freehold of the building on the open market at a realistic price to reflect the building's condition
- iii the merits of alternative proposals for the site and, exceptionally, the benefits for the community weighed against the arguments in favour of preservation

4.6 Paragraph 4.27 continues by stating that where a building makes little or no contribution, that consent should not be given unless there are acceptable and detailed plans for any redevelopment. In such cases, it has been held that the decision maker is entitled to consider the merits of any proposed redevelopment in deciding whether consent for demolition should be given.

4.7 Paragraph 4.29 states that where consent for demolition is granted, it is often appropriate to impose a condition to provide that demolition shall not take place until a contract for the carrying out of any works of redevelopment has been made and planning permission for those works has been granted.

#### UDP policies

4.8 STG 2 "The environment" states that the Council will protect and enhance the open and the built environment; that in particular, it will conserve and enhance areas and buildings of historic or architectural interest or of special townscape value. It says the Council places a high priority on the protection and enhancement of the natural and built environment without compromising its future and its wider local, national and global context.

4.9 STG 3 "Conservation of resources and pollution" states that the Council will ensure that development is consistent with the need to conserve energy, resources including water and materials and to reduce pollution. At 3.10 it says The Plan's overall strategy seeks to achieve the efficient long term use of resources and that in considering whether new building is necessary it will retain and, where appropriate, refurbish existing buildings rather than re-develop them.

4.10 ENV 26 "Thames Policy Area" states that the Council will seek to protect and enhance the special character of the Thames Policy Area by:

- ensuring that development establishes a relationship with the river and takes full advantage of its riverside location, addressing the river as a frontage.....
  - encouraging development which includes a mixture of uses, including uses which enable the public to enjoy the riverside, especially at ground level in buildings that front the river
  - requiring an assessment of the potential of the site for river-dependent uses and facilities if there are none existing
- 4.11 ENV 28 "Encouragement of the recreational use of the River Thames tributaries and riverbanks" states that the Council will encourage new facilities.
- 4.12 ENV 29 "Passenger and hire boats" states that the Council will encourage the provision, maintenance and improvement of passenger and boat hire services and ferries, and that it will seek to provide piers and short stay visitor moorings. It recognises that passenger boats add visual interest to the river and attracts and gives pleasure to tourists, and that more boat piers on the Thames will encourage further use of the river in accordance with the Plan's policies and the Council's tourism policy.
- 4.13 ENV 30 "Riverside uses" states that in considering development sites, the Council will seek uses that are functionally related to the river, add to its character, and enable the public to enjoy it.
- 4.14 BLT 2 "Protection and enhancement of conservation areas" states that the Council will pay special attention to the preservation or enhancement of the character or appearance of the conservation area by:
- retaining buildings which make a positive contribution to the character or appearance of the area
  - not granting conservation area consent for demolition which would be detrimental to the character of an area unless detailed proposals have been approved (including the resolution of relevant conditions) for an acceptable replacement
  - request the Secretary of State for the Environment to authorise the use of powers under the Planning (Listed Buildings & Conservation Areas) Act 1990 where a key building in a conservation area appears to be in need of repairs
- 4.15 BLT 26 "Environmental improvements" states that the Council will continue to undertake and encourage improvements to the environment, in co-operation with local groups and businesses, and in connection with developments carried out in the

Borough, particularly at locations on the proposals map, which includes the application site

- 4.16 BLT 27 "Vacant buildings and vacant land" states that the Council will use its powers where appropriate to ensure that vacant buildings or vacant land do not have a detrimental effect upon amenity. Suitable temporary uses will be encouraged pending a decision on their permanent use.

## 5.0 CONCLUSIONS

### The pool building

5.1 It has been demonstrated that the pool building:

- has architectural quality and distinction of local interest
- makes a positive contribution to the character and appearance of the conservation area
- has been seriously neglected and needs urgent repairs
- is capable of economic refurbishment
- is suited to accommodating compatible new uses
- could provide accommodation for uses that it may be uneconomic to provide from new
- could be incorporated into redevelopment proposals for the site as a whole
- is potentially attractive as a development proposition.

5.2 Consent should be refused because demolition:

- would be harmful to the character and appearance of the conservation area contrary to PPG 15 and UDP policies
- would result in the loss of a potentially useful building and the waste of material resources contrary to UDP policies
- would be harmful to the character of the Thames Policy Area contrary to UDP policies
- could prejudice redevelopment proposals for the site as a whole contrary to UDP policies.

### The proposals

5.3 It has been demonstrated that the proposals would:

- Be unattractive and dominant
- Fail to address or establish a suitable relationship with the river
- Fail to provide a mixture of uses that enable the public to enjoy the riverside
- Fail to provide uses that are functionally related to the river
- Fail to provide river-related recreational facilities

5.4 Planning permission should be refused because the proposals would be:

- Harmful to the character and appearance of the conservation area contrary to PPG15 and UDP policies

- Harmful to the character of the Thames Policy Area contrary to UDP policies.

## **APPENDIX 1 Letters & reports**

<b>A1.1</b>	6 November 2001	Myself to LBRUT
<b>A1.2</b>	16 January 2003	Myself to LBRUT
<b>A1.3</b>	21 January 2003	Andreas Sarhage to LBRUT
<b>A1.4</b>	15 February 2003	Michael Landolt to LBRUT
<b>A1.5</b>	23 April 2003	Myself and Ron Chappell to DCMS
<b>A1.6</b>	4 June 2003	DCMS to myself & Ron Chappell
<b>A1.7</b>	6 May 2003	English Heritage's advice to DCMS
<b>A1.8</b>	16 May 2003	Myself to LBRUT
<b>A1.9</b>	9 June 2003	Myself to GOL
<b>A1.10</b>	22 July 2003	Myself to LBRUT
<b>A1.11</b>	2 December 2003	My closing submissions to PINS
<b>A1.12</b>	8 January 2004	Ancient Monuments Society to PINS
<b>A1.13</b>	12 January 2004	Save Britain's Heritage to PINS
<b>A1.14</b>	9 October 2003	LBRUT Proof of Evidence (excerpt)

## **APPENDIX 2 Photographs & drawings**

- A2.1** Pool building and river from the north-east
- A2.2** Pool building and embankment from the south-west
- A2.3** Pool building and cars from the east
- A2.4** Centre detail of pool building from the south-east
- A2.5** 1st floor centre windows from inside
- A2.6** Proposed floor plans of pool building
- A2.7** Proposed site plan

## **LIST OF REFERENCE DOCUMENTS**

- 1 Construction drawings of the pool building, LBRUT, 1934
- 2 Inspector's Report into the Marks & Spencer application, August 1991
- 3 Twickenham Riverside Conservation Area Study, LBRUT, November 1998
- 4 Thames Landscape Strategy: Hampton to Kew (June 1994)
- 5 Planning Policy Guidance Note PPG15
- 6 The Richmond upon Thames Unitary Development Plan: First Review, Consolidated Post Deposit Changes, November 2001