

**From:** [PCU](#)  
**To:** [Rachael Beard](#)  
**Subject:** FW: Twickenham Riverside Development  
**Date:** 01 December 2021 08:51:37

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**From:** Jon Rowles [REDACTED]  
**Sent:** 30 November 2021 20:03  
**To:** PCU <PCU@communities.gov.uk>  
**Subject:** Twickenham Riverside Development

Re: The London Borough of Richmond upon Thames (Twickenham Riverside)  
Compulsory Purchase of Land and New Rights in Twickenham Riverside

Dear Sir or Madam,

I am writing to **object** to the above order on the following grounds.

### **1. Departure Application**

The Riverside Development plans were examined as part of the Local Plan process and the Government Inspector made the council make a series of important changes including retaining car parking on the Riverside to protect the interests of those who live and work on Eel Pie Island; retention of part of the site for a public park; reducing the size of the development to maintain its viability and to protect council taxpayers' money.

You can see the original report by using this link  
[https://www.richmond.gov.uk/twickenham\\_area\\_action\\_plan](https://www.richmond.gov.uk/twickenham_area_action_plan)

The intended development is also in conflict with the Conservation Area and is seeking to shoehorn a large urban-style development into a quiet riverside area – that is often described as having a countryside air - in conflict with the stated aims of the Conservation Area management plan.

This Compulsory Purchase Order is seeking to unpick most of these changes and therefore I feel there **needs to be a public examination/inquiry** before a decision is made whether to grant the Order.

### **2. Background**

#### **The Town Centre**

Whilst Twickenham Town Centre looks healthy at first glance there is very little comparative retail left and most residents must drive to nearby metropolitan centres such as Kingston for comparative goods – and food if they are on a budget. This greatly increases the traffic in the area and is environmentally unsustainable.

Food is relatively expensive in Twickenham as the only full-sized supermarket is a Waitrose, with the alternatives being convenience store formats with food prices at between 10-30 per cent more per product (than the same item in their larger format stores) and then compounded by product discrimination whereby often the only option is

an expensive premium product.

The shop units in the centre have struggled to attract retail tenants for years. Many in the locality feel the number of rugby matches played at Twickenham in the key period in the run-up to Christmas each year negatively affects the retail sector. Unfortunately, most matches occur on Saturdays in the run-up to Christmas and into the new year sales period for retail stores and therefore hits them particularly hard.

Thus, I feel the retail trading environment in Twickenham is fragile and there needs to be great caution in doing anything that will prevent more people from visiting the town centre. The removal of so much parking could well have a large negative impact on the vitality and viability of the town centre.

## **Political Background**

The local council is currently run by the Liberal Democrats. Whilst they do not have a formal coalition agreement, they had a joint-ticket agreement at the last local elections where the LibDems did not field a candidate in certain wards and asked their supporters to use their third vote to elect a Green councillor instead. This is part of a bigger election pact where the Green Party agreed to stand down in the Bi-Election to give Sarah Olney a clear run against Zac Goldsmith. Many of the policies that the LibDems have been pursuing at a local level are clearly influenced by the arrangement between these two parties – and their need to ensure the Green Party do not eclipse them locally

## **Car parking**

### **Car Parking – Eel Pie Island**

I note that the planning file contains a number of objections from owners and managers of boatyards and sports clubs based on the island who fear the loss on the embankment car park will result in their closure.

The Government Inspector previously rejected plans to remove the same car park stating that it would put the unique Eel Pie Island at risk.

I believe that some car parking needs to be retained for Eel Pie Island and riverside users (such as Twickenham Rowing Club) and that the development needs to be redesigned so that it can be discretely incorporated away from the promenade area. There also needs to be more of a commitment to upgrade the alternative car parking areas – as the two alternatives proposed by the Council have serious drawbacks as they stand.

### **Car Parking – Shoppers / Service Users**

Twickenham is the largest centre on the Middlesex side of the Borough and is its administrative headquarters of the Borough (and has lots of law firms, financial advisers and companies that serve more than just the local neighbourhood).

If the embankment car park is closed the remaining two main car parks will be the Holly Road car park (171 spaces) and Aragon Road multi-storey (437 spaces). The Holly Road surface car park is accessed via side streets and service yards and is not somewhere where many visitors, esp. women would want to walk after dark. The Aragon Road car park has an entrance that can be very forbidding and lacks investment and is dated. When Waitrose is closed access is via an alleyway, there is limited CCTV/ security, and parking places are narrower than British Standards that mean a standard

supermini cannot fit into a parking place and allow for car doors to open properly. This means that the disabled and elderly avoid this car park as you often find yourself blocked in and must access your car via the passenger door. If the council made the parking spaces up to the standard the capacity of Aragon Road would be reduced to 327 places.

It's quite normal for councils to move car parking and decant it – indeed many town centres are greatly improved by such measures. However, the planning application documentation shows that they haven't worked up proper plans for the replacement parking provision nor is there a proper assessment of the parking demand generated from the new development. They have taken the approach that there will be no increase in parking demand because everyone will arrive by public transport or walk cycle – which is clearly not going to be the case.

The fear that many business owners have is the reduced parking provision will not be sufficient to meet existing demand plus the new visitors who will visit the riverside development but who are going solely for recreational purposes but are not visiting to buy goods and services. If shoppers find difficulties parking several times in a row, there is a risk they simply visit Kingston instead where parking is in abundance, and you can park for £1 per hour at the Bentall's Department shopping centres' Seven Kings Car Park. The council seem oblivious to the fact that shoppers have a choice and that nearby centres have a vastly better assortment of shops and restaurants, and the parking can be a lot cheaper.

#### **Local Plan / Council Policy on Car Parking**

The Council's official transport and car parking policy are supposed to be guided primarily by what is contained in the Local Plan/Development Management Plan (as that has been tested publicly) and known as the 'primacy' principle. However, at recent planning meetings, the councillors and officers are making recommendations and decisions based upon what is contained in the Third Richmond Local Implementation Plan that has subtle but important differences.

For example, the LIP States the Council has adopted the Mayor of London's Parking Standards. However, when you read the Richmond local plan has modified these (see appendix 16) "PTALs 4-6: as per London Plan although local circumstances, CPZ times and on-street parking conditions will need to be assessed." There is also a lot of additional text that modifies the London Parking standards that make it considerably more generous in Richmond than elsewhere in London when you read it as a whole.

The Traffic Management Act 2004 places a statutory duty on the council – often known as the Network Management Duty – and it appears the Council is trying to remove car parking places to prevent car use for ideological reasons that are in conflict with this national policy. The Richmond LIP also states that CPZ are being used to prevent car use, pay and display bays in CPZ are minimised to make parking difficult on purpose, and they intend to increase CPZ from one third to two thirds in the Borough to prevent car use.

The council started some work on developing a new Local Plan before Covid forced a pause. The consultation they carried out included closing most council-owned surface car parks and building houses on them. Therefore, I feel there is a clear anti-car agenda at play in all decisions the council is making that needs to be considered when assessing this Order.

Overall, I believe that the Council has not come to a sound judgement about the

removal of the parking on the Embankment in part to woolly thinking about what policy is in force relating to parking in the Borough – and that have in their mind what they believe it should be and not actually what it is – and are acting beyond their powers.

Overall, I feel if the Order is implemented it will result in a parking crunch in Twickenham that will see people circling for spaces and result in more air pollution and that the vitality of Twickenham will be negatively affected – as customers give up on the town and drive the short distances to alternative centres.

### **Conservation Area**

The new development goes against the Conservation Area Management Plan and does not respect the character of the area. It shoe horns in a 'docklands' style development with an event space designed to play amplified music every weekend. This, I fear, will have a negative impact on the character of the area that has been described as the best stretch of the River Thames within the administrative boundary of Greater London that has an almost a countryside feel.

The proposed changes to the CPZ to accommodate the development is also going to see extra parking bays placed into the historic Georgian core of Twickenham which will have a negative impact on their respective Conservation Areas and settings of listed buildings. I note that the Campaign for the Protection of Rural England has lodged a complaint on the design and have requested there is a change in the design to respect the character of the area.

The original Twickenham Area Action Plan envisaged a new car park on the Station Yard site to decant car parking and I believe that this still remains the best option rather than removing parking and 'hoping for the best.'

The Council's pre-planning advice from their own planning department also states that the development will have a negative impact on the historic buildings (including listed buildings) on Kings Street and Water Lane and their relationship and interplay haven't been effectively resolved with too much massing and bulk.

### **Social Impact**

Many residents who live in the surrounding areas such as Whitton and the Hamptons have very poor public transport links (with many areas having a PTAL of under 1) and therefore driving is the only realistic option for many). Removing the parking will restrict their ability to visit Twickenham on a regular basis.

Many elderly residents get a great amount of enjoyment in their sunset years by visiting the Riverside but are in a category that means they don't qualify for the blue badge but are at the same time unable to walk to the riverside from the alternative car parks that are proposed. My elderly father fits into that category and I find the Council's lack of concern for its elderly population distasteful.

### **Reprovision of Diamond Jubilee Gardens**

I do not feel the replacement Diamond Jubilee Gardens will not be of equal quality as the current provision. Currently its enclosed, flat and above the flood level and a traditional park that families can use and is a valued breakout space from the main

shopping area because of its tranquillity.

Whilst the replacement is more fragmented, mixed-use, and is a place you pass through rather than spend time in. Most of the reprovisioned land will be on a slope or under the flood level which is clearly of lower quality than what is already there – and the noises coming from the Twickenham Riverside Trust indicate their independent survey has serious reservations.

The proposed event space (that is intended to be in use most weekends) will also displace young families in favour of those looking to attend free outdoor gigs. Whilst the large pub poses the risk of turning the area into an extended beer garden – like the Barmy Arms has done to the other end of Twickenham Embankment.

### **Economically Viability & Protecting Public Funds**

It has been indicated by the council that the site will need another £11 million-plus of public subsidy over existing subsidies already secured (such as dipping into the social housing fund) and as the council will be developing themselves, they are exposed to the risk of rising costs and shortfalls.

When the inspector reviewed the Twickenham Areas Action Plan, he scaled back the original development on the grounds that it wouldn't be financially viable. I believe your department needs to look at the viability plans very carefully as the current set of councillors could be placing liabilities onto the council that it can ill afford – and Richmond is a small authority with very limited reserves.

I feel the political decision for 50% of the apartments to be affordable housing is part of the viability problem. There has already been off-site linked affordable housing provided in relation to the development in Shacklegate Lane with six three-bedroom houses and four three-bedroom houses amongst others linked sites. Ultimately social housing at this site is expensive to deliver and trying to make a political point of having 50% social housing we are going to fewer social housing units overall with the real world consequence that some people will be in unsuitable accommodation that otherwise would not be.

All councillors have a duty to spend public funds prudently – but I do not feel that an £11 million-plus public subsidy can be described as prudent. Especially as there is no evidence, they investigated redesigning the development to reduce the subsidy needed.

### **Summary**

I am not opposed to development on the Riverside, nor do I seek for the perfect to be the enemy of the good. However, I do not believe the council has resolved the main issues surrounding the development and that as it currently stands is likely to create many people who will be seriously impacted.

Therefore, I feel you need to have a public enquiry to decide the matter so that people can make representations in person – as this is a complicated matter and not something that can be readily done by letter and the decision-maker needs to have a real feel of the town and the context.

Yours faithfully

Jon Rowles

