

The Secretary of State for Levelling Up, Housing & Communities
Casework Unit
5 St Philips Place
Colmore Road
Birmingham, B3 2PW

Dear Sir,

Opposition to the Compulsory Purchase Order:

London Borough of Richmond upon Thames (Twickenham Riverside) Compulsory Purchase Order 2021

The Richmond Environmental Information Centre (REIC) would like to lodge its strong opposition to the Compulsory Purchase Order (CPO) submitted by the London Borough of Richmond upon Thames (LBRuT), specifically in relation to the land comprising the Diamond Jubilee Gardens (DJG) and held in trust on a 125-year lease by the Twickenham Riverside Trust (TRT).

The REIC is a charity registered with the Charities Commission (Charity No: 1129804) and was founded in 1996; its constitution includes the aims “*To promote the conservation, protection and restoration for the public benefit of the natural resources, natural beauty and animal and plant life of Richmond upon Thames*” and “*To advance the education of the public in ecology, environmental studies, resource conservation and natural history*”.

The REIC took part in the Royal opening of the DJG on 23rd June 2012 opened by HRH Princess Alexandra, at which the REIC exhibited its project ***Memories of Twickenham Riverside***, which had been funded by the Heritage Lottery Fund. This saw the beginning of numerous popular family events held on the DJG, only interrupted recently by the pandemic and lockdowns; the REIC exhibited further projects at many of these events.

The REIC is fundamentally opposed to LBRuT’s proposed CPO as this would clearly be detrimental to the important public amenity provided by the DJG and the benefit it provides to the local community.

Patrons: Professor Jeremy Hamilton-Miller D.Sc., Lord Goldsmith of Richmond Park
Chairman: Berkley Driscoll FCMI
Hon. Secretary: Teresa Read B.A., Cert Ed (Bus & Econ), Dip IT
Committee: Sheila Illsley (CPRE), James Tuke B.Sc., Tim Sierwald ACMA B.Sc. (Env. Science)

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LBRuT had said that it would meet TRT's requirement, and statutory obligation as defined by the Charity Commission, to "*ensure that any exchange or reprovizion of land is 'equally advantageous' to the people of Twickenham*". This requirement has evidently not been met, which was obvious to the REIC, many in the community and now confirmed by the TRT's respected professional advisors.

The DJG is currently a safe, enclosed public park, high above the flood plain and particularly suited to the many families with young children who regularly use the gardens. There is a community café, a non-profit training service managed for people with learning disabilities, which also provides public toilets. There is a secure, enclosed playground which is used year-round along with a separate sandpit. There is a large paved town square, along with a large level space adjacent, which provides the ideal facility for community events all year. Very importantly, the DJG is **completely above** the flood zone by the tidal Thames. It is also important to note that the DJG land has been designated as Public Open Space.

LBRuT is intending on replacing this garden with a fragmented collection of terraced landscaping, part of which is under the flood level. The playground is to be moved next to the service road and overlooked by the proposed Water Lane apartment block. The 'public toilets' are to be shared with the proposed new pub and the community café appears to be lost. The 'reprovizioned' DJG will no longer have a town square, but will instead be allowed use of the paved 'event' area on the Embankment, which is on the flood plain; the same area that LBRuT said it cannot build floodable boathouses because of flood risk! But the key part of LBRuT's reprovizioning is to replace the DJG with an apartment block consisting of 24 private luxury flats, forever destroying an important piece of Public Open Land on an important riverside site.

The Twickenham riverside site was bought by the council in 1924 to provide "public walks and pleasure grounds". From 1935 to 1980 this was the site of the extremely important and popular Twickenham Lido.

The REIC does not object to the refurbishment and regeneration of the Twickenham Riverside site, but this does not need to be done at the expense of the community losing the DJG. Without the CPO, and leaving the DJG in place, LBRuT can still accomplish much of its proposed development. The construction of the Water Lane building, providing 21 affordable housing units as well as ground floor retail units, can still proceed. The Embankment can still be pedestrianised, parking removed and the DJG better connected to the Embankment. The DJG can also be refurbished and its facilities improved. All this can be achieved without the CPO and without destroying the DJG.

The REIC implores the Secretary of State to reject this application for a CPO by LBRuT and help preserve a very important piece of Public Open Space.

Yours sincerely,

Berkley Driscoll
Chairman, Richmond Environmental Information Centre