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The Secretary of State for Levelling Up, Housing and Communities,
Planning Casework Unit,
Department for Levelling Up, Housing and Communities,
23, Stephenson Street,
Birmingham,
B.2. 4.B.H.

22nd November, 2021.

Sent by e-mail 22nd November, 2021.

Dear Sir,

THE LONDON BOROUGH OF RICHMOND UPON THAMES (TWICKENHAM RIVERSIDE) COMPULSORY PURCHASE ORDER, 2021

I am writing as a local resident of Twickenham to support the Twickenham Society, of which I am life-member, and many others in the local community in objecting to the Compulsory Purchase Order made on the 21st October seeking to purchase compulsorily the 125-year lease of the much valued public open space known as the Diamond Jubilee Gardens fronting Embankment and the river beyond from the trustees of The Twickenham Riverside Trust, as advertised with a Notice published in the local press – *The Richmond and Twickenham Times* - issues dated 21st and 28th October and 4th November - but giving the wrong postal address for the Planning Casework Unit, as corrected in the letter from Ardent Infrastructure and Regeneration dated 18th November sent on behalf of the Council.

Having read the documentation submitted in support of the 'hybrid' Order, I am objecting on the grounds that such action by the Council is wholly unjustified for the purposes set out in the documentation – not least, in order to facilitate the implementation of the development proposals for which Planning Permission is presently being sought by the Council from itself which contain many fundamentally unacceptable aspects to which I have drawn attention in the attached statements. I very much hope that the Secretary State will decline to confirm the Order and will instead require the Order to be withdrawn or require the matter to be determined through a Public Inquiry held jointly with that relating to the application for Planning Permission which clearly merits 'call-in' by the Secretary of State.

Please advise me in due course of the Secretary of State's decision in this matter.

Yours faithfully, Paul Velluet.

PAUL VELLUET,
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CONSERVATION, DEVELOPMENT AND PLANNING

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PROPOSALS FOR THE DEVELOPMENT OF THE TWICKENHAM RIVERSIDE SITE

DETAILED COMMENTS IN RESPONSE TO THE APPLICATION FOR PLANNING PERMISSION – REFERENCE 21/2758 – NOVEMBER, 2021

The bringing forward of proposals for the future of the Twickenham Riverside Site is to be welcomed in broad principle. However, like the earlier proposals for which the former Council administration was minded to grant Planning Permission (application reference 17/4213/FUL - subsequently withdrawn in June, 2018), the present proposals fail to provide a sound and sustainable solution that reflects the outstanding significance of this important riverside site and responds with sensitivity to the established character of the Twickenham Riverside Conservation Area. As presently submitted, the proposals do not represent a truly 'exciting, energising and inspiring' development solution which merits the support of the entire Twickenham community and not just the few.

On the 24th September, I submitted initial comments to the Council on the proposals for the development of the Twickenham Riverside Site in response to the application for Planning Permission, reference 21/2758/FUL. A copy of these comments is appended to this representation with key issues highlighted in red. To those critical comments, I would add my concerns regarding the following:

ERRORS, OMISSIONS AND ANOMALIES IN THE SUBMITTED DOCUMENTATION

- Anomalously, the proposed provision of nine, 'bespoke prefabricated lockers' below the terrace serving the proposed 'gastro-pub/restaurant' for the storage of boats shown on pages 168 and 169 of the *Design and Access Statement* is not shown in either the submitted 1:250 scale plans and sections, nor accounted for in the schedule of non-residential floor-space under Use Class D.2 in section 19 of the application-form.
- The considerable distance between the proposed boat-storage area and the existing, purpose-designed slipway opposite the foot of Water Lane appears to be far from ideal unless the proposed pontoon is to be used. However, no information is provided about how the proposed pontoon is to safely accessed with a movable 'brow' which allows for significant tidal movement, and how access to the 'brow' and pontoon is to be controlled in the interests of public safety.

- Despite the submission of a substantial quantum of information, no indication is given as to how pedestrians – particularly children and the elderly - across the greater part of the application-site (other than along Water Lane and Wharf Lane) are to be effectively protected from cyclists using the many potential routes that criss-cross the site, or from vehicular traffic movement adjacent to the riverside.
- In Table 5 – Unit and Tenure Mix of Proposed Development in the *Planning Statement* it is stated that ‘Affordable’ Housing comprises 53 Habitable Rooms and Private Housing comprises 53 Habitable Rooms. On this basis it is argued that there is an acceptable 50:50 split between private housing and ‘affordable’ housing in the development. However the figure stated for private housing is clearly incorrect in that the private housing contains 53 bedrooms alone* and includes no figure for other habitable rooms, which may be reasonably estimated as 19 in number (24 flats less 5 ‘studio’ flats) giving a total of 72 habitable rooms. The 53 figure stated for the number of habitable rooms in the ‘affordable’ flats is correct in that the 21 flats contain 32 bedrooms* and do not include any studio flats. On this basis, not only are there a lesser number of ‘affordable’ flats than private flats (21 vs 24), but a lesser number of habitable rooms in the ‘affordable’ flats than in the private flats (53 vs 72). * Figures taken from section 18 of the application-form.
- No definitive and acceptable proposals have been put forward clarifying how the 109 car-parking spaces* presently serving the needs of local residents, shoppers, businesses, workshops, users and staff of the local restaurants, cafes, Mary Wallace Theatre, Twickenham Museum, Eel Pie Island Museum, Twickenham Boat Club, Twickenham Club, St Mary’s Church and Church Hall, and many other visitors to Twickenham, who contribute to the economy of the heart of Twickenham, proposed for removal and displacement away from the application-site are to be adequately relocated and accommodated in nearby residential streets and other locations. * Figure taken from section 11 of the application-form. (Anomalously, according to paragraph 7.8 of the submitted *Planning Statement* the existing site only contains 78 parking-spaces).
- The current application appears to be technically invalid in the absence of confirmation in section 25 of the application-form that the required, formal notice of the application has been served on the Trustees of the Jubilee Gardens has been served, given their continuing leasehold interest in the relevant part of the application-site.

OTHER CONCERNS

- Whether using the numbers of residential units or the numbers of habitable rooms, it is disappointing that the provision of ‘affordable’ housing in the development is less than the minimum 50% laid down in the Council’s own, formally adopted planning policy (Policy LP 36 of the *Richmond-upon-Thames Local Plan* of July, 2018). The breakdown in the number of bedrooms in the respective blocks of housing is significant: 24 no. ‘market housing’ flats (comprising 5 no. 1-bedroom; 9 no. 2-

bedroom and 10 no. 3-bedroom units) and 21 'affordable' residential units (comprising 17 no. social, affordable or intermediate rent flats - 9 no. 1-bedroom; 7 no. 2-bedroom; and 1 no. 3-bedroom units) and 4 no. affordable home ownership flats (comprising 2 no. 1-bedroom and 2 no. 2-bedroom units)*. It is particularly disappointing that in the proposed development by the Council of a Council-owned site, the proposed provision of 'affordable' housing is less than 50%. In this connection, no evidence appears to have been submitted to explain why the proposed 320 square metres of office (Use Class B1(A)) floor-space at ground floor level in the proposed block running down the north-eastern side of Wharf Lane could not have provided additional 'affordable' housing, as well as providing a desirable social mix of private and 'affordable' housing. * Figures taken from section 18 of the application-form.

- The overall design of the public realm within the proposed development fails to provide an exemplary and coherent solution in either urban design or landscape terms that responds sensitively to the scale and character of the adjacent part of the Twickenham Riverside Conservation Area as identified in the Council's own *Conservation Area Study* of November, 1998; nor does it enhance the character, appearance or significance of this strategically important riverside site at the heart of the conservation area, or deliver an attractive, safe, easily accessible and non-floodable, central urban space or 'Town Square' that mediates between the commercial heart of Twickenham centred on Church Street, Heath Road, London Road, King Street and York Street, and the distinctive riverside character and amenity of The Embankment and Riverside, as envisaged in the original design competition brief of March, 2019 and in section 7.5 of the formally adopted *Twickenham Area Action Plan* of July, 2013.
- The excessive scale of the upper part of the proposed new development on the south-western side of Water Lane at its north-western end in relation to that of the modestly scaled historic and other buildings on the corner Church Street and Water Lane directly opposite (nos. 31 and 32, Church Street, and nos. 1A, 1, and 3, Water Lane) and the adjacent three-storey, 1930s, retail and residential building immediately to the south-west, will have a potentially harmful impact on the character, appearance and significance of the Twickenham Riverside Conservation Area and the setting of the Queen's Road Conservation Area directly opposite.
- The excessive height and bulk of the proposed new building on the north-eastern side of Wharf Lane in relation the existing four-storey flats at Thames Eyot and the three-storey flats at Eyot Lodge to the south-west, and the potentially damaging effect of the proposed development as seen in views along the river from Radnor Gardens to the south-west and in views along the river from the riverside section of York House Gardens to the north-east – as identified in the Council's own *Conservation Study* of November, 1998; and in views from across the river along the riverside path on the Surrey bank, will have a potentially harmful impact on the character, appearance and significance of the Twickenham Riverside Conservation Area.

- The proposed removal of over forty trees from across the application-site including many which contribute positively to the character, appearance and visual amenity of the application-site and its setting, as scheduled in Tables 2 and 3 in the submitted *Twickenham Riverside Arboricultural Impact Assessment and Method Statement* of July, 2021, and shown in the submitted drawings, will have a potentially harmful impact on the character, appearance and significance of the Twickenham Riverside Conservation Area.
- The loss of a very substantial number of car-parking spaces from the application site without adequate alternative provision in the immediate area will have a seriously damaging impact on the effective functioning of the heart of Twickenham commercially, culturally, recreationally and socially.
- The lack of distinction and coherence in the overall design of the development in both urban design and landscape terms is usefully demonstrated in the highly disturbing and unconvincing impressions of the proposed development conveyed in the coloured illustrations – assumed NOT to have been prepared by Hopkins Partners – featured on pages 64, 66, 68, 69 and 77 of the submitted *Design and Access Statement*; on pages 12, 14, 16 and 17 of Part 1 and page 5 of Part 2 of the submitted *Landscape and Public Realm Strategy*. For a site of such importance as the Twickenham Riverside Site, the scale and character of the development proposals need to be convincingly demonstrated in *Accurate Visual Representations*, and not merely in *Computer Generated Images* by the architects or in lesser images as those referred to above.

Having now scrutinised the extensive documentation submitted in support of the application in greater detail, I am bound to observe that in so many respects the proposals as presently drafted not only fail to deliver a number of the key aims set out in the original competition brief (*Twickenham Riverside Site Invited Design Competition, Memorandum of Information* of March, 2019) and the sounder and more realisable aims set out in Section 7.5 of the *Twickenham Area Action Plan* of July, 2013, but more importantly, they are inconsistent with the relevant national, London-wide and local planning policies, set out in the *National Planning Policy Framework* of July, 2021 (in respect of paragraphs 130.a), b), c), d), e) and f), 197, 199, 200, 201, 202 and 203); in *The London Plan: The Spatial Development Strategy for Greater London* of March, 2021 (in respect of Policies HC1.C and HC3.F and D.3.1), 4), 5), 10), 11), 12) and 13); and the *Richmond-upon-Thames Local Plan* of July, 2018 (in respect of Policies LP1, LP2, LP3, LP4, LP5, LP12, LP13, LP14, LP16, LP18 and LP31); and inconsistent with the relevant guidance contained in the *National Design Guide: Planning practice guidance for beautiful, enduring and successful places* of January, 2021 (in respect of characteristics C.1 and C.2; 1.1, 2; 3; B.1 and B.2; M.3; and P.1, P.2 and P.3.).

In such a situation and in my professional judgement, the Council would be well advised to withdraw the current application and review and revise its present proposals fundamentally. Indeed, the Council would also be well advised to limit redevelopment to the south-western side of Water Lane alone, reversing the long-running scene of dereliction, and simply effect the environmental enhancement of the remaining and greater part of the site at minimal risk and at

only modest cost. Such a course would immediately remove the considerable, potential planning, legal, contractual risks and costs that presently face the Council and the wider community.

Importantly, the adoption of such an approach would increase the chances of securing a development that really would provide a truly 'exciting, energising and inspiring' solution and merit the support of the entire Twickenham community and not just the few.

**Paul Velluet, M.Litt., RIBA, IHBC, Chartered Architect.
November, 2021.**

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**INITIAL COMMENTS ON THE PROPOSALS FOR THE DEVELOPMENT OF THE
TWICKENHAM RIVERSIDE SITE AS SUBMITTED IN RESPONSE TO THE APPLICATION
FOR PLANNING PERMISSION, REFERENCE 21/2758/FUL, 24th SEPTEMBER, 2021**

The submitted proposals represent a tragically missed opportunity by the Council to secure a development of this highly significant riverside site of outstanding architectural and landscape interest or quality offering potential major benefits to the amenity of Twickenham and its community for years to come. Instead, we are confronted with proposals lacking any real coherence or delight in urban design terms and failing to offer any meaningful enhancement of the Twickenham Riverside Conservation Area and this stretch of the river, other than reversing the disgraceful dereliction of the Council-owned buildings and land extending down the south-western side of Water Lane. Above all the proposals run counter to the interests of sustainability through the needless destruction of the relatively modern, well used and very attractive landscaped riverside walk between the lower end of Wharf Lane and the slipway at the lower end of Water Lane (matching the landscaped walk extending from Water Lane to *The Barmy Arms*) and the relatively modern Diamond Jubilee Gardens public open space with their much used and well protected children's playground and attractive raised terrace and modest café overlooking the river, and through unjustifiably excessive and costly works of demolition, excavation and construction across a substantial part of the site.

It is difficult to see how the replacement of the present children's playground within the existing public open space with a vastly over-scaled, five-storey block of twenty-four apartments for sale to the private sector and a pub/restaurant of up to 444 square metres, extending down the length of Wharf Lane on a raised podium, contributes to the amenity of Twickenham and its community. Importantly, there appears to be no recognition that the proposed block will overshadow a significant part of the proposed new open space to its immediate north-east for much of the day. Interestingly, too, no allowance appears to be made in the schedule of areas given in section 19 of the application-form for the notional boat-

storage below the podium. Little if any information is provided about the access to the proposed floating pontoon from what remains of the presently attractive riverside walk, or the true nature of the 'floating eco-system' close by.

What has happened to the several laudable objectives set down in the original 'brief' issued to prospective architects in March, 2019 and in the more detailed 'brief' issued to the short-listed architects in June, 2019 – the financial criteria of which have been kept secret despite requests for sharing with the public.

To quote the Leader's 'vision' as referred to in the 'briefs' – 'This is a great opportunity to deliver real change through an exciting, energising and inspiring design'.

Despite the many months spent in 'consultation' with representatives of the local community; late negotiations with the Environment Agency leading to substantial changes to the original proposals on which Hopkins Architects were first selected and subsequently appointed in February last year; and justified debate about the significant consequences of removing most of the existing car-parking from the riverside (and its being displaced into other parts of the Town) and how existing businesses and homes as well as the development itself are to be adequately and safely serviced, we are left with proposals which fall far short of being 'exciting, energising and inspiring'. Even one of the few potential benefits of the proposed development – encouraging and increasing riverside activity – is ill-defined and unclear.

Instead, we have the prospect of the redistribution of the lost public open space of the Diamond Jubilee Gardens into an incoherent series lawns, petanque pitches and a children's play area at high level, separated into parts by a non-pedestrian-friendly diagonally-aligned cycle route; and the creation of a vast area of unrelieved, hard-paving at riverside level, with some fragmentary, unmanageable areas of grass – the proposed, floodable Town Square - with no indication about how moving vehicles, cycles and pedestrians are to be kept safely apart – and the creation of a tiered events-area which will require extensive metal balustrading to make it safe for the public. **No way is this 'a riverside park' that justifies the massive cost of its creation, nor bears comparison with the character and delights of the riverside parts of York House Gardens, Orleans Gardens or Marble Hill Park further downstream, or Radnor Gardens further upstream.**

Perhaps the only positive aspects of the present proposals are the involvement of the deservedly and highly regarded Hopkins Architects in the design of the buildings – hopefully to be retained throughout the development process right up until completion – and the development of a block of shops and a café with twenty-one affordable housing units above extending down the south-western side of Water Lane – but compromised sadly, by the entirely unjustified widening of Water Lane to take two-way vehicular traffic, rather than being primarily dedicated for pedestrian movement down to the river. **Indeed, if the Council wished to reduce risk and costs, it would limit redevelopment to the south-western side of Water Lane alone, and simply enhance the remaining and greater part of the site at no risk and modest cost.**

Quite disgracefully, the twelve, existing and proposed views of the development from different positions around the site contained in Section 6 of Iceni Projects' *Heritage, townscape and visual assessment* would appear to be highly deceptive and may not be relied upon in providing sound impressions of the potential impacts of the proposals. Indeed, this is reflected in paragraph 6.3 of the document where there is a health warning: 'It was agreed with LBRuT that the CGIs (Computer Generated Images) did not need to be produced as Accurate Visual Representations (AVRs), which are verified for accuracy. Little wonder then, that little reliance can be placed on sections 7 and 8 ('Assessment of effects' and 'Conclusions') of Iceni Projects' *Heritage, townscape and visual assessment*.

Sadly, this is a fundamentally flawed project and should be withdrawn, reconsidered and redesigned. Only then will an 'exciting, energising and inspiring' solution that really rises to the occasion be secured - one which will merit the support of the entire Twickenham community.