

Secretary of State for Levelling Up, Housing and Communities,
National Planning Casework Unit,
5 St Philips Place,
Colmore Row,
Birmingham,
B3 2PW

17 November 2021

Dear Sir,

**London Borough of Richmond Upon Thames (Twickenham Riverside)
Compulsory Purchase Order 2021, Compulsory Purchase of Land and New
Rights in Twickenham Riverside**

I wish to register my objection to the above Compulsory Purchase Order (CPO).

Part of the land covered by this proposed CPO, which is now largely occupied by the Diamond Jubilee Gardens, was acquired in the 1920s for the amenity of the people of Twickenham. It served in this role through the provision of a swimming pool and public bathing facilities on the site. The pool facilities were eventually closed, then demolished and the site fell into dereliction. However, the amenity for Twickenham was restored with the laying out of the popular Diamond Jubilee Gardens under the stewardship of the Twickenham Riverside Trust.

The redevelopment of the site proposed by London Borough of Richmond Upon Thames (the Council) which prompted this CPO will see the Diamond Jubilee Gardens broken up into the smaller packets of land offered up as exchange land in the CPO. These do not provide the same utility or amenity as the present contiguous gardens. Indeed, part of this exchange land is in an area of tidal flooding and another is in essence a pavement. As such they do not meet the tests of equal utility required.

The Council has not met a further test for a CPO in that they have not considered alternative means of achieving their objects. This is evidenced by the fact that there was a previous scheme for this site that achieved equivalent benefits for the town, left the Diamond Jubilee Gardens intact and enhanced, and had been granted planning permission. There are other ways of improving this site without resorting to a CPO.

The Council's Statement of Reasons (Section 11) proposes issuing a stopping up order to convert part of the Embankment which is presently a highway to be exchange land. Eel Pie Island is connected to the Embankment by a footbridge and this is the only access to the island. As well as private residences there are numerous businesses and three boatyards which are important to commercial and

recreational use of the river. The present traffic flow in the area is a predominately one-way flow down Water Lane, along the Embankment before exiting via Wharf Lane. The Council's planning application envisions two-way traffic in Water Lane with a turning area at the southern end of the road for vehicles servicing Eel Pie Island. The traffic plans shown for this area have not been subjected to a safety audit and they may prove to be unsafe or unsustainable. The only option shown for articulated lorries, such as those which from time to time deliver steel to the boatyards, is following the present flow along the Embankment. It is essential that the Embankment remains a highway, even if it has controlled access, to protect this necessary use of the roadway and maintain the statutory rights that a highway implies.

Yours faithfully,

