

**THE LONDON BOROUGH OF RICHMOND UPON THAMES**

**TOWN AND COUNTRY PLANNING ACT 1990 – SECTIONS 226(1)(a) AND  
226(3)(b)**

**LOCAL GOVERNMENT (MISCELLANEOUS PROVISIONS) ACT 1976  
ACQUISITION OF LAND ACT 1981**

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

**AND**

**APPLICATION FOR A CERTIFICATE PURSUANT TO SECTION 19 AND  
SCHEDULE 3 ACQUISITION OF LAND ACT 1981**

---

**SUMMARY PROOF OF EVIDENCE ON BEHALF OF THE ACQUIRING AUTHORITY**

**DOCUMENT LBR2C**

**DESIGN & OPEN SPACE**

---

**Chris Bannister**

**Director**

**Hopkins Architects**

**9 May 2023**

1.       **INTRODUCTION**

- 1.1       This summary of the Proof of Evidence has been prepared on behalf of the London Borough of Richmond upon Thames (the ‘Council’), the Acquiring Authority, in respect of the Modified Order.
- 1.2       My name is Chris Bannister. I am a Director of Hopkins Architects. I have been responsible for the detailed design of the Scheme following the Design Competition win in 2019.

2.       **QUALIFICATIONS AND EXPERIENCE**

- 2.1       I have two degrees in Architecture (BA(Hons) and B.Arch) both from Manchester University and I am a registered member of the Architects Registration Board (ARB) and the Royal Institute of British Architects (RIBA). After joining Hopkins Architects in 1992 I became a project Director in 1999 and a Director in 2002. Projects I have worked on have included Portcullis House at the Houses of Parliament, The new National Tennis Centre in Roehampton, the Olympic Velodrome for the London 2012 Olympics and more recently the completion of 100 Liverpool Street in the City of London.

3.       **SCOPE OF EVIDENCE**

- 3.1       This Proof of Evidence is made in support of the Order which was made by the Council on 11 October 2021, and which is to be determined by the Secretary of State following this Public Inquiry.
- 3.2       My evidence describes the Scheme Land as it exists at present and provides details of the objectives set out in the RIBA Full Design Brief (**CD 3.1**) for the architectural competition. The response to these objectives in our winning Design Competition scheme are then discussed along with the development of the Scheme following the Design Competition. Details of the Scheme as submitted in the Planning Application are then presented along with a description of how the scheme meets the objectives. I then carry out a comparison of the existing and proposed open space, both in terms of quantity and quality. Finally, my evidence addresses the objections raised against the CPO regarding Design Matters and finishes with my conclusion.

4.       **THE SCHEME LAND AS IT EXISTS AT PRESENT**

- 4.1       The existing Scheme Land is a collection of spaces that lack cohesion and do not make the most of their location on the edge of the river Thames. Surrounded by roads on three sides and raised up above the embankment the existing Gardens have limited accessibility and the existing buildings on the site are of low architectural merit and do not fit well with the surrounding streetscape. Several have been derelict for many years and detract from their

riverside setting. Photographs of the existing open space and buildings are provided in **Appendix LBR2B(1)**.

**5. THE OBJECTIVES SET OUT IN THE RIBA FULL DESIGN BRIEF**

- 5.1 The key themes in the brief were centred around making the “riverside a destination”, improving the link between the river and the town and creating a new “Heart for Twickenham”.
- 5.2 The brief suggested that the public open spaces should be improved, offering hard and soft landscaping that is accessible to all and that scheme should take full advantage of the river views. The design should create a focal point for the town that accommodates activities and events and should provide residential uses, achieving a minimum of 50% affordable housing, taking into account existing site uses and relevant planning policy. Designs should also consider other uses, making the most of the riverside location.
- 5.3 Another key part of the RIBA Full Design Brief was to re-provide the Gardens, the majority of which in 2014 had been leased to the Trust on a 125 year lease. It was highlighted in section 2.3 of the Design Brief that the Trust’s charitable objectives are not limited to a particular piece of land but rather refer to a mission to: “preserve, protect and improve for the benefit of the public the riverside and its environs at Twickenham”.
- 5.4 It was also stated that the development of the Scheme Land represented an exciting opportunity for the Trust to advance its objects within an enhanced space with improved facilities for visitors and provided scope to widen the range of events and activities the area could host.

**6. THE RESPONSE TO THESE OBJECTIVES IN THE DESIGN COMPETITION SCHEME**

- 6.1 The competition scheme responded to the brief by putting the new open space at the heart of the scheme and place a new building at each end that would add life and vitality to the area making it somewhere that people from miles around would want to come to as it was an exciting place to be. The new open space was laid out to take advantage of the varying levels across the Scheme Land in order to create variety and allow different activities to happen at the same time.
- 6.2 Large scale terraced steps were also suggested to allow people to sit and interact with activity on the embankment to bring vibrancy and life to the waterfront. By removing the imposing retaining wall and introducing a number of different levels and different routes, to transition between the different levels, the new design scheme proposals would significantly enhance the connectivity between the open space and the riverside making both more accessible.

7. **THE DEVELOPMENT OF THE SCHEME FOLLOWING THE DESIGN COMPETITION**

- 7.1 The design development of the competition winning scheme was affected by the need to comply with the Environment Agency's requirements around the flood defence walls and flooding issues on the site (**Appendices LBR2B(3) – (5)**). This resulted in a reduction in both the built form and the bulk of the buildings and an increase in the amount of open space (**Appendix LBR2B(6)**). The revised design has achieved this in a way that retains the vision of the original competition scheme but that has also improved certain aspects, such as the accessibility of the new open space. During this period consultations with local stakeholders emphasised the importance of establishing and encouraging greater activity on the river and as a result a proposal for locating a boathouse at the end of the Wharf Lane building was developed and agreed with the Environment Agency along with a pontoon in the river to provide better access to the water.

8. **DETAILS OF THE SCHEME AS SUBMITTED FOR PLANNING APPROVAL**

- 8.1 The Future Designated Open Space would be located at the centre of the proposals (Map C **CD 4.3C**) with two new buildings that bookend the Scheme and help to provide a base level of life and activity that will help animate the space and create a degree of natural surveillance.
- 8.2 The building would contain retail and other public uses at ground floor level with residential accommodation on the levels above, 50% of which is proposed to be affordable.
- 8.3 The buildings have been designed to fit in with their context with the Water Lane building relating to the other buildings in the town (see View A – **Appendix LBR2B(8)**) and the Wharf Lane building very much part of the river scene and as such taking inspiration from the wharf type buildings along the river, particularly those on Eel Pie Island. This is evident in the simple form of the buildings, the long linear roofs and modular nature of the facades (see view E – **Appendix LBR2B(12)**)
- 8.4 A sloping path up from the Embankment at the south east corner of the Scheme Land (View C – **Appendix LBR2B (10)**) along with a band of open space running down from King Street into the Gardens at the upper level help to significantly improve the accessibility of the Gardens from all directions.
- 8.5 At the river end of the Water Lane building a large cafe unit is proposed that looks out over the Scheme Land and the river, the outdoor seating area of which forms part of the Future Functioning Open Space (View B – **Appendix LBR2B(9)**).
- 8.6 A number of activity spaces would be provided at the upper level. Two pétanque courts would be located underneath a number of pleached London Plane trees with a number of fixed bench seats for spectators to use. A large children's play area would contain a number

of pieces of play equipment including a large tree house and climbing wall. Three large grass lawn areas would be provided at different levels with access off from the sloped path and would provide space for informal play and relaxation.

- 8.7 The upper levels of the Future Designated Open Space (view D – **Appendix LBR2B(11)**) look down on the flexible Events space on the Embankment, timber seating terraces would transition between the two levels on two sides and would provide space for people to sit and watch the Events Space or activity on the river. The dimensions and proportions of the Events Space have been scaled to accommodate a wide variety of temporary events including concerts and markets. External lighting, power and water would be provided around the perimeter of the space.
- 8.8 At the western end of the Embankment a floodable boathouse for kayaks and paddleboards would be located underneath the seating terrace for the gastro pub/restaurant. A layout space for paddleboards would be provided underneath the trees and a bridge link would provide access down onto a pontoon that would float alongside the river wall and provide easy access to the water. The kayaks and paddleboards would be stored in a series of separate lockable lockers allowing the boathouse to potentially be used by a number of different local groups.
- 8.9 The Embankment is designed to allow limited access across the Events Space for large vehicles from 7am to 10am with access controlled by lockable bollards at both ends – the Events Space is shown outlined in red on Map D (**CD 4.3D**), which also shows that part of the Events Space which sits within the Future Highway Land.

9. **HOW THE SCHEME MEETS THE OBJECTIVES**

- 9.1 The proposals provide a comprehensive redevelopment of the underused site to provide an increase in the quantum of open space along with an increase in quality of open space, greater biodiversity, better accessibility, better visibility, better interaction with the public and better connectivity between the town and the river.
- 9.2 The scheme would provide 45 residential units, 21 of which would be affordable achieving the 50% affordable housing requirement by habitable room, assisting the Borough in meeting housing need and making more intensive use of the Scheme Land as sought by policy.
- 9.3 As a result, I believe the proposals clearly meet the objectives outlined in Section 5 of this Statement of Evidence based on the requirements of the RIBA Full Design Brief (**CD 3.1**), the Local Planning policy including the Local Plan (**CD 2.4**) and the Twickenham Area Action Plan 2013 (TAAP), (**CD 2.5**).

10.     **A COMPARISON OF THE QUALITY OF OPEN SPACE**

- 10.1     When analysed in isolation the Exchange Land is not only larger than the Lost Open Space it also contains more useable space, (an increase of 80% or 64% if circulation is excluded).
- 10.2     When reviewed in context with the Scheme and the adjacent functioning open space the Future Functioning Open Space is also larger than the Existing Functional Open Space and contains more useable area, (an increase of 54% or 58% if circulation is excluded).
- 10.3     The Future Functioning Open Space is also laid out in one cohesive development that provides better accessibility and allows all the spaces to interact with each other to provide something that is greater than the sum of its individual parts.
- 10.4     The size of the future Event space on the Embankment is slightly larger than the combined size of the existing artificial grass and the existing event space in the Gardens and then there are the future grass lawn areas and parts of the circulation space that could also be used in summer to provide additional space for events. Whilst the existing event space is located in flood zone 1 and the new Events Space is located in flood zone 3 the analysis of the historical flood data (**Appendix LBR2B(13)**) has shown that the vast majority of floods have historically occurred in the winter and with most events taking place in summer this is unlikely to have a major impact on its use, (subject to changes that may occur due to climate change). Given its more accessible location with inbuilt spectator seating it would seem reasonable to assume that the Events Space would attract more spectators than the existing space.
- 10.5     The Events Space also extends up to the edge of the river which gives rise to the possibility of events taking place linked to activity on the river such as Dragon boat racing. With the new pontoon and the seating terrace for the gastro pub also overlooking this area this could give rise to interesting possibilities and help fulfil the brief requirement to promote river based activities which is not so easy with the existing arrangements.

11.     **A REVIEW OF THE OBJECTIONS RAISED REGARDING DESIGN MATTERS**

- 11.1     A number of objections have been made to the Order (and Modified Order) and my evidence responds to all of the objections insofar as they relate to Design matters.
- 11.2     None of the issues raised by the objections differ from the issues that have already been considered and assessed by the Planning Authority when determining the Planning Application.

12. **CONCLUSION**

- 12.1 The proposals that have been developed by the Design Team over the last four years have responded to the brief that was set by the Council, with input from the various stakeholders, to improve the environment of the Scheme Land, linking the new open space with the river and creating a new “Heart for Twickenham”
- 12.2 The proposals were selected ahead of four other schemes as part of an RIBA run design competition for the Scheme Land. Since winning the competition the design has been modified to respond to issues raised by the Environment Agency in regard to the flood defence structures on the site, but throughout all this the central principles of that competition scheme have been maintained and in some ways strengthened by the changes.
- 12.3 The Scheme puts the new open space at the heart of the proposals whilst locating new structures at either end that will bring life and activity to the area. The link through to the centre of town has been widened which will improve visibility of the river and encourage more people to use the open space. Accessibility to the open space has also been significantly improved. Instead of being hidden behind fencing and hedges on a plateau, separated from the river by a sea of cars, the new open space sits adjacent to the river with all areas interconnected and visible, raising the prospect of all sorts of new events taking place linked to activity on the river.
- 12.4 I have compared the proposals against the existing in terms of the section 19 context of the Exchange Land versus the Lost Open Space in isolation, but also looking at the open space as a totality in both the existing and proposed contexts, which is the more realistic exercise. In all scenarios the future proposals have come out on top providing both more space overall but also more useable space. When the spaces are compared in terms of quality of space the future proposals have also been demonstrated to be superior to the existing.
- 12.5 On the basis of the above, although it is Mr Chadwick who addresses the overall position in respect of the Section 19 Application, I conclude that the Exchange Land is more advantageous to the public than the Lost Open Space in its quality and quantity.