



08/04/2023

We, Tower of Power Limited, trading as the Eel Pie Island Bridge Company, own and maintain the main path on Eel Pie Island and the footbridge giving the only pedestrian access to the island. This bridge crosses the river to The Embankment onto land which is part of the existing Embankment. The bridge is adjacent to the steps leading to the river close to the bottom of Water Lane.

The Island consists of 50 residential properties plus a number of people living on residential boats. In all, the island has about 160 residents. There are 23 businesses, which include 4 working boatyards, as well as workshops and artists' studios.

There is a rowing club on the Island with more than 500 members, including an elite national rowing squad. There is a yacht club on the Island with approximately 150 members. The two clubs hire their premises out for social events such as weddings and parties plus regular yoga and tai chi classes. The income earned from these lettings is essential to the financial viability of the clubs. There are many boats moored on the Island, and areas of native woodland at either end of the Island.

The residential and working community on the Island needs all the services of any residential street, and industrial and commercial requirements. It needs access for tradespeople who maintain the buildings, the paths and the trees on the Island. There are weekly rubbish and recycling collections by large lorries. There are regular deliveries of bottled gas. The residents, clubs and businesses require regular vehicular access to the bottom of the bridge on The Embankment road for their own access and for all the services required to maintain a community. There is an ice cream vender with a permit to park his van next to the river at the bottom of Water Lane.

There are four historic working boatyards on the Island with slipways, docks, pontoons and wharfs which provide the infrastructure to service both small and large river boats. These boatyards were created when the half lock was built at Richmond over 100 years ago and are amongst the few last remaining facilities which can maintain and service river craft in the borough and indeed on the whole tidal Thames. These boatyards also provide training for apprentices in the skills of boat maintenance and repair. The boatyards require regular deliveries of materials to the bottom of the footbridge. These materials usually consist of heavy steel and are delivered in large trucks. At times there will be more than one long heavy vehicle parked at the bottom of the bridge, one behind the other stretching across The Embankment road at the bottom of Water Lane.

The Council states in **10.25 of the Statement of Case** that:-

“ a key output for the scheme is to reduce motorised traffic from The Embankment and prioritise people over cars. This has been balanced with the reprioritisation of the remaining and existing car parking spaces to the east of the Scheme Land, so as not to disadvantage the residents of Eel Pie Island, as well as providing adequate servicing and loading space, to ensure that the Island continues to thrive as a place of employment and not affect the historic boatyards.”

At the top of Water Lane the Council has relatively recently created a large loading bay capable of accommodating a large fixed flat bed truck, or 2 or 3 average sized delivery vans. This loading bay is very seldom empty and is fully occupied a lot of the time both on weekdays and at weekends. This loading bay, switched to the other side of Water Lane is to form part of the Council's scheme, thereby narrowing the top part of Water Lane very considerably, making it too narrow to support the introduction of a two-way system without vehicles having to give way in this area. The vehicles that use it service King Street and Church Street, the latter of which is pedestrianised after 10am each day. They also service the three businesses at the top of Water Lane. They do not service Eel Pie Island. When they leave the loading bays they, along with all other vehicles using Water Lane, will have to drive down to The Embankment road and will be required to turn around and go back up Water Lane. We do not believe there has been any risk assessment carried out by the Council to the impact these loading bays will have on traffic movement on Water Lane or the turning area on The Embankment.

The Council claims there are around 9 deliveries per day to the Island. This is a huge underestimation. If the scheme is implemented the turning circle at the bottom of Water Lane will be used far more frequently for delivery vehicles than the Council claims, as not only has the servicing of Eel Pie Island been hugely underestimated, the presence of a Water Lane loading bay has not been taken into account.

The Council is suggesting that The Embankment road between Water Lane and Wharf Lane, may be permitted to be open at specific times of the day (7:00-10:00am) for large vehicles making deliveries to the Island. The problem with this is that the Islanders are not necessarily going to know in advance what time their deliveries and pick-ups will arrive, or what sized vehicle will be coming.

The Council has proposed increasing the number of loading bays (from three to six) to the west of the foot bridge. These will assist smaller delivery vans servicing the island, but will not solve the problem of the large vehicles making deliveries to, or collecting from, the Island. Large vehicles will have to park beside the river and, particularly when there is more than one vehicle, will encroach on the area the Council proposes will be the turning space at the bottom of Water Lane and opposite the bottom of the bridge. The presence of large trucks will make it more difficult to turn safely.

The Council states in **clause 10.4 of the Statement of Case:-**

“The Council considers there is a compelling case in the public interest for the making of the Order.

.....The Council considers that the scheme will make a significant contribution to the promotion and achievement of the economic, social and environmental well being of the area.”

We are concerned that Richmond Council's proposed development on the river front between Water Lane and Wharf Lane and the partial closing of The Embankment road which will require vehicles to turn at the bottom of Water Lane will have a serious and detrimental impact on the residents, clubs and the businesses on Eel Pie Island and their employees and customers.

It will also have a hugely detrimental effect on the public who frequent this part of the riverside at present. The Embankment at the bottom of Water Lane consists of steps down to the river. It is a space where families gather to look at the river and feed the ducks, geese, swans and even a heron! People launch paddle boards and canoes from these steps. Boats collect and drop off people and equipment onto the steps. The ice-cream van operates from there.

No robust safety audit of the proposed turning circle at the bottom of Water Lane has been carried out. We do not believe the Council has properly considered the danger to cyclists, pedestrians and particularly families and children of large delivery vehicles turning in this space.

The Council claims that there are two people in each delivery vehicle, one of whom can get out of the vehicle and direct the driver when the vehicle is backing and turning in reverse. In our experience there is only one person in the vast majority of delivery and servicing vehicles coming to the footbridge, and that is the driver. So these vehicles cannot back safely. This will result in The Embankment at the bottom of Water Lane no longer being a safe space for the public to access the river via the steps down to the river.

The Council states in **Section 10.39 of the Statement of Case:-**

“The scheme has been designed in line with fluvial 100 year + 35% climate change level at the TE 2100 tidal flood level and improves on the current flood storage and rainwater management capacity within the Scheme Land boundary whilst also achieving a strengthening of the connection between the Scheme Land and the river.”

The Council talks about the proposed turning area being impacted by “occasional high tides”.

We believe the Council has not properly considered the frequency and the height to which the water currently flows over The Embankment road at the bottom of Water Lane at high tide at this present time, let alone what it will do in future with predicted sea rise. As a result, the Council is not able to demonstrate that it has considered adequately the safety of the proposed Water Lane turning circle.

The river Thames starts in the Cotswolds in Oxfordshire. It is 215 miles long, so it has flowed more than 180 miles before it reaches Twickenham. There are 45 locks on the non-tidal river Thames, which help to

control the flow of water in the various parts of the river. It can take 2 to 3 days for heavy rain in Oxfordshire to reach Twickenham.

The non-tidal river ends at Teddington, which is around the corner up river from Twickenham. Between Twickenham and Richmond the river is semi-tidal. At Twickenham the river doesn't fall to its natural level at low tide, because of the weir gates at Richmond being closed for approximately 16 hours a day. The river is very much affected by rain flowing along its route. Heavy or persistent rain increases the flow of the river very significantly at Twickenham.

Additionally the Thames at Twickenham is also affected from time to time by tidal surges along the east coast of the UK. Strong and/or persistent wind from the north, the north east, the east and/or the south east cause the sea level to rise and this results in the water which flows into the river from the sea on an incoming tide being much higher than predicted.

Both heavy rainfall and tidal surges can result in the river being around a metre higher than predicted.

The impact of flood water and tidal surges affects the height of the river independently of spring or neap tides. This means that the river flows over The Embankment for more days and nights than the tide tables predict.

For example in April 2023, the water came over the road either side of high tide to an extent that would impact on the safety of vehicles turning for a total of 17 days and/or nights. The information of the actual heights the tides reached in April at Richmond Lock is shown on the Port of London tidal records below.

Between Richmond Lock and Teddington Lock the minimum level water level is maintained at 1.72m above the Ordnance Datum at Newlyn (AOD) by the sluices at Richmond Lock.

The tidal height shown at the Richmond tide gauge is above the Admiralty Chart Datum at the tidal gauge.

The chart datum is 0.61m below AOD hence:

Tidal Height on Tide Gauge	Height Relative to AOD
2.0m	1.39m
2.5m	1.89m
3.0m	2.39m
3.5m	2.89m
4.0m	3.39m
4.5m	3.89m
5.0m	4.39m
5.5m	4.89m
6.0m	5.39m

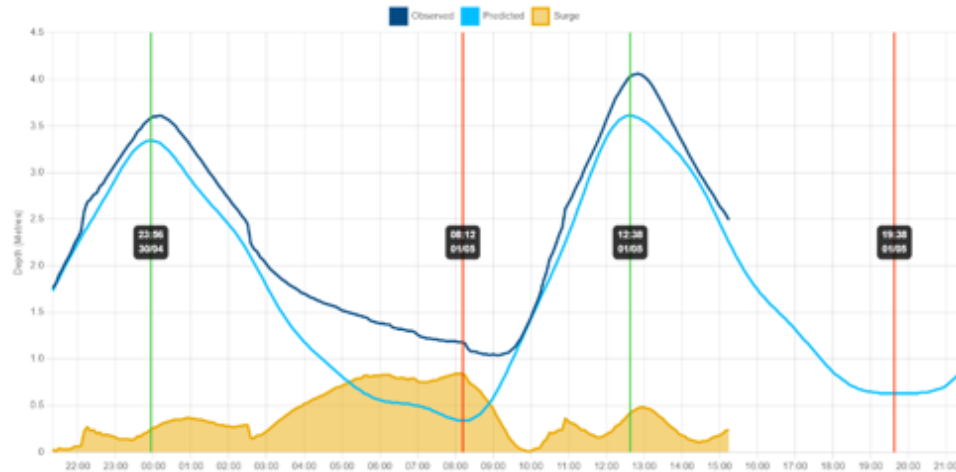
Predicted tidal heights do not take into account the surge which is mainly caused by high rainfall flows in the river.

The effect of this is shown below on a benign day.

Live tides for Richmond

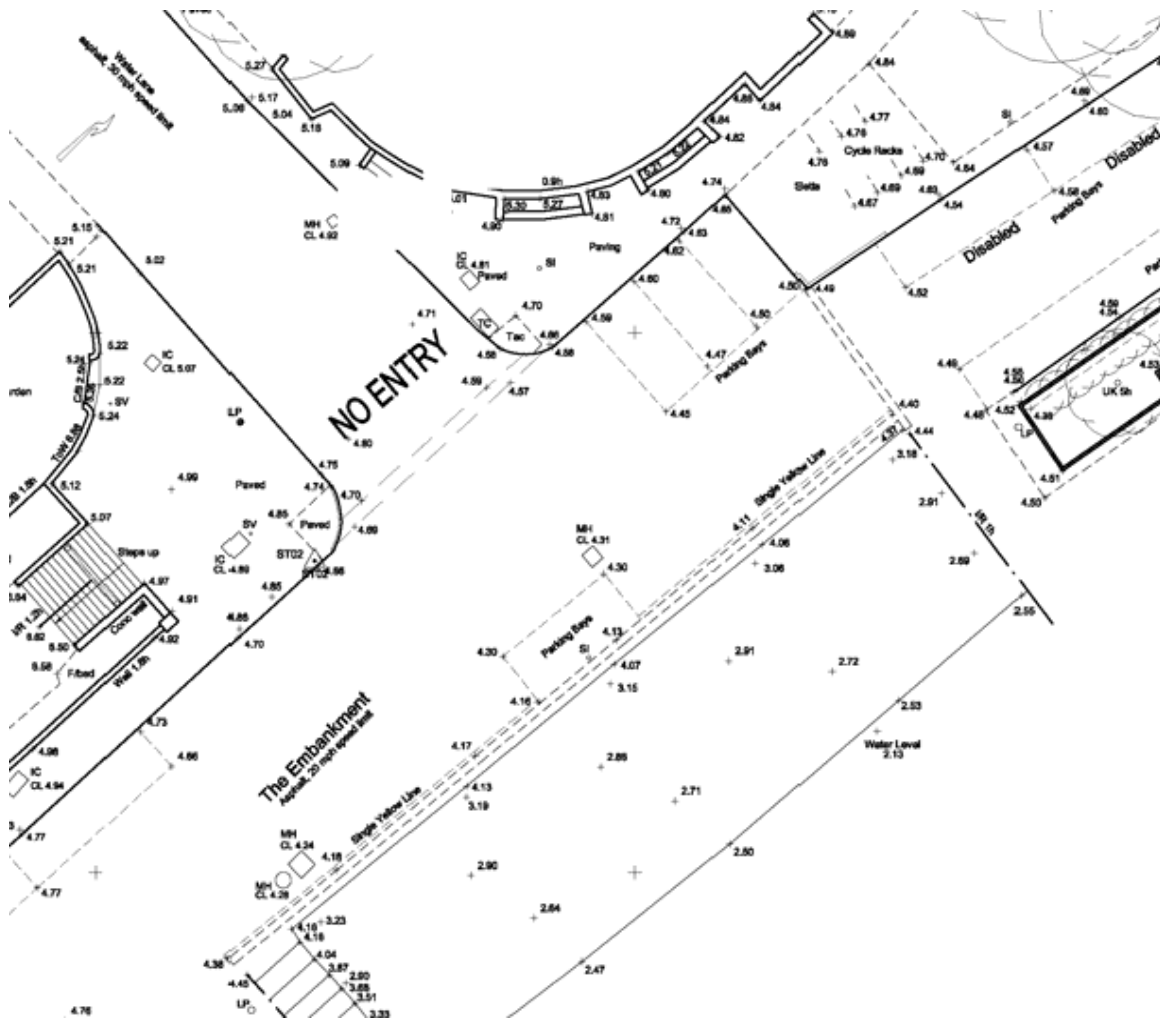
Select a different site: [Richmond](#) [Go to Live Tides Overview](#)

Graph generated at 15:19 BST.



The light blue line shows the astronomical prediction for tidal heights and the dark blue line the actual heights measured at the Richmond tide gauge. The difference between the two is the surge. In the example shown the surge for the afternoon tide is approximately 0.5m but there have been many instances over the years where the surge has approached 2.0m.

Digital Survey of Area at South End of Water Lane



The river edge of The Embankment is at approximately 4.1M AOD.

The table below shows the tide data (from PLA sources) for Apr 2023.

The surge depends largely on amount of rainfall in the Thames catchment area upstream of Teddington including those tributaries such as the rivers Mole, Wey, Cherwell and Kennet.

The surge tends to be greatest in the wet winter months and reduced in summer.

The April figures are at neither extreme.

The tides that were at or over the river edge are highlighted.

Date	HW Time (GMT)	Predicted HW Height (m above CD)	Surge	Observed HW Height (m above CD)	Observed HW Height (m above AOD)
Sat 1 Apr	1121 2337	3.4 3.4	1.0 0.7	4.4 4.1	3.8 3.5
Sun 2 Apr	1239	3.7	0.6	4.3	3.7
Mon 3 Apr	0047 1328	3.8 4.0	0.4 0.4	4.2 4.4	3.6 3.8
Tue 4 Apr	0135 1405	4.1 4.3	0.2 0.5	4.3 4.8	3.7 4.2
Wed 5 Apr	0213 2241	4.4 4.5	0.3 1.4	4.7 5.9	4.1 5.3
Thu 6 Apr	0246 1510	4.6 4.7	0.3 0.4	4.9 5.1	4.3 4.6
Fri 7 Apr	0318 1543	4.8 4.8	0.3 0.3	5.1 5.1	4.5 4.5
Sat 8 Apr	0353 1618	5.0 4.9	0.1 0.2	5.1 5.1	4.5 4.5
Sun 9 Apr	0431 1655	5.0 4.9	0.0 0.2	5.0 5.1	4.4 4.5
Mon 10 Apr	0509 1732	4.9 4.6	-0.1 -0.2	4.8 4.4	4.2 3.8
Tue 11 Apr	0549 1810	4.7 4.4	0.0 0.1	4.7 4.5	4.1 3.9
Wed 12 Apr	0632 1851	4.4 4.1	-0.3 -0.2	4.1 3.9	3.5 3.3
Thu 13 Apr	0722 1943	4.1 3.8	0.1 -0.2	4.2 3.6	3.6 3.0
Fri 14 Apr	0828 2050	3.8 3.6	0.3 0.4	4.1 4.0	3.5 3.4
Sat 15 Apr	1007 2219	3.7 3.5	0.5 0.5	4.2 4.0	3.6 3.4

Sun 16 Apr	1134 2355	4.0 3.9	0.5 0.4	4.5 4.3	3.9 3.7
Mon 17 Apr	1242	4.4	0.5	4.9	4.3
Tue 18 Apr	0057 1336	4.3 4.8	0.3 0.4	4.6 5.2	4.1 4.6
Wed 19 Apr	0147 1421	4.6 4.9	0.2 0.3	4.8 5.2	4.2 4.6
Thu 20 Apr	0230 1503	4.8 5.0	0.2 0.4	5.0 5.4	4.4 4.8
Fri 21Apr	0309 1542	5.0 5.0	0.3 0.3	5.3 5.3	4.7 4.7
Sat 22 Apr	0348 1619	5.1 4.9	0.2 0.2	5.3 5.1	4.7 4.5
Sun 23 Apr	0426 1654	5.0 4.8	0.2 0.2	5.2 5.1	4.6 4.5
Mon 24 Apr	0506 1730	4.9 4.6	0.2 0.3	5.1 4.9	4.5 4.3
Tue 25 Apr	0547 1805	4.6 4.3	0.2 0.0	4.8 4.3	4.2 3.7
Wed 26 Apr	0629 1842	4.2 4.0	0.2 0.1	4.4 4.1	3.8 3.5
Thu 27 Apr	0718 1924	3.7 3.6	0.3 0.1	4.0 3.7	3.4 3.1
Fri 28 Apr	0826 2033	3.4 3.3	0.2 0.1	3.6 3.4	3.1 2.8
Sat 29 Apr	0936 2152	3.3. 3.2	0.5 0.1	3.8 3.3	3.2 2.7
Sun 30 Apr	1038 2256	3.4 3.3	0.4 0.4	3.8 3.7	3.2 3.1



23/04/23 Tide beginning to fall at proposed turning circle at the bottom of Water Lane

When the water is over the road it is very difficult to tell, when you are at the wheel of a vehicle, where the road ends and the steps down to the river begin. This would be a particular problem when the vehicles are reversing.

We have seen vehicles drive over the edge of the road towards the river, when there is water on The Embankment at which point they become stuck on the edge of the road and have to be lifted back onto the embankment by a crane.



04/03/2022 Skip Lorry attempted to manoeuvre at high tide

In this case the truck was driving forward when there was water over The Embankment road and still the driver could not see where the edge of the road was. This vehicle drove off the bank during daylight. In the winter turning a vehicle when the road is covered with water and having to judge where the road ends and the steps to the river begin in the dark will be even more dangerous for large vehicles.

The proposal to make Water Lane a two-way road with vehicles turning on The Embankment road next to the river is not safe for the public on The Embankment, for cyclists or for vehicles and drivers. It is not going to work.

We repeat that we are concerned that the Council has not carried out a proper risk assessment of the suitability or the safety of making Water Lane a two-way road or of creating the proposed turning area on The Embankment at the bottom of Water Lane and in front of the Island footbridge.

The Council says in **Clause 11.192 of the Statement of Case:-**

“The Council considers that the scheme not only improves the flood defence and flood water management of the Embankment, thereby improving the overall situation, but there would also be far less cars using the space and so there would be improved flexibility for people to use the Embankment in ways that they currently cannot...”

Given the information about the tides in Twickenham, and the effect of additional rain water and the access to the large areas of flood plains in the borough, we fail to understand what the Council means when it says that “the Scheme improves the flood defence and flood water management.”

The Council states in **Clause 10.2 of the Statement of Case:-**

“Compulsory Purchase is essential to enable the scheme to take place and for the Council to achieve its policy objectives.”

We believe the Council is not correct saying that the CPO is essential for the Council to achieve its policy objectives.

The Council states in **Clause 10.3 of the Statement of Case:-**

“The Council understands and acknowledges that the Compulsory purchase of land should be a measure of last resort where negotiations have been unsuccessful and that there should also be a compelling case in the public interest that justifies interfering with the rights of those with an interest in the land.”

We believe the Council can achieve the development of the land it already owns along Water Lane/The Embankment without acquiring the land it seeks in this CPO and without causing huge disruption to Eel Pie Island.

There was a planning application made by a previous administration to develop the existing Council land adjacent to Water Lane in 2018. This planning application had achieved a “minded to grant” status in March 2018, subject to negotiations with the Environment Agency. This planning application was cancelled by the present administration. This 2018 planning application extended public open space on the land above the Embankment. It created shops, new restaurants/cafes, and a substantial number of residential units.

The present planning consent supporting this CPO contains only the equivalent of 12 two bedroom flats more than the 2018 planning application, without all the disruption to the lives of the community living and working on Eel Pie Island. Therefore, there was another reasonable and appropriate scheme, which would, and presumably still could, significantly contribute to the promotion and achievement of the economic, social and environmental wellbeing of the area without causing the huge disruption to the lives of the residents and the businesses on Eel Pie Island, and to all those who work and visit and service the island.

The Council states in **Clause 10.12 of the Statement of Case:-**

“The Council is satisfied that the Scheme represents a significant investment in the area, the benefits of which will be considerable to the economic, social and environmental wellbeing of the Borough. paragraph 103 of the CPO Guidance is clear that

“the benefit to be derived from exercising the {wellbeing} power is not restricted to the area subject to the Compulsory Purchase Order, as the concept is applied to the wellbeing of the whole { or any part} of the acquiring authorities area”

As such, the Council and Secretary of State are required to consider the benefit to the local area and the Borough when considering whether, and to what extent, the redevelopment is likely to achieve the promotion of economic, social or environmental well-being of the area.”

We believe this Scheme will have a very significant negative impact on the community of Eel Pie Island and for those who visit The Embankment at the bottom of Water Lane, and we do not believe the Council has properly considered the impact their scheme will have on these areas or our community.

Lacy Chapman
Secretary
Tower of Power Ltd.

Tower of Power Ltd trading as Eel Pie Island Bridge Company
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Registered in England 03125913
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C/o 5 Aquarius,
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TW1 3EA

18th November 2021

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

Dear Sir,

**Objection to the London Borough of Richmond Upon Thames (Twickenham Riverside)
Compulsory Purchase Order 2021 (the Order)**

Tower of Power Limited (**TPL**) write to confirm their objection to the Order.

TPL are proprietors of a River Works Licence (**RWL**), issued by the Port of London Authority, dated 19 November 1998. The RWL grants TPL the right to construct, renew, maintain and retain the 'Snapper' footbridge between Twickenham and Eel Pie Island. TPL are noted as occupiers in the Order, over areas of the river Thames subject to oversailing.

TPL requests that the Secretary of State does not confirm the Order until its concerns (set out below) are resolved by the Promoter.

Confirmation is sought from the Promoter that:

- (1) no unregistered rights or statutory rights granted to TPL under the RWL in accordance with the Port of London Act 1968, which enable the use of the footbridge, will be interfered with. TPL may have the benefit of rights in land adjacent to the footbridge pursuant to s66(1)(b) of the Port of London Act 1968 as the RWL is "*deemed to confer on the holder of the licence such rights in, under or over land as are necessary to enable the holder of the licence to enjoy the benefit of the licence.*" The CPO itself should exclude such matters against plots where TPL is said to have an interest (namely, plots 66, 68, 70, 71) and also plots (e.g. plot 58) along the embankment where such rights can extend by virtue of s66(1)(b); and

KEEPING THE FOOTBRIDGE OPEN
EEL PIE ISLAND
BRIDGE
COMPANY

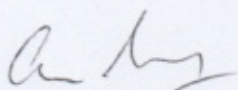
- (2) the oversailing rights (and any other rights or land acquisition) sought in the Order will not interfere with use of, maintenance, or access to the footbridge, or any structure or building on Eel Pie Island. TPL require an oversailing licence and works co-operation agreement to be entered into.

As a general matter TPL submits that the Promoter should be made to repay to TPL all proper costs, charges and expenses (including the proper fees of such professional advisers as they by instruct) reasonably incurred in consequence of the Order.

We further note that the Promoter will be seeking a stopping up order. Deliveries to Eel Pie Island are made via Water Lane, and vehicles then continue along the embankment, and exit via Wharf Lane. We understand there is a proposal to stop up this route, and introduce a two-way highway in lieu. TPL has concerns about disruption to deliveries being made to the Eel Pie Island and the safety of pedestrians and vehicles in connection with this proposal. Whilst we appreciate this is a matter which will be dealt with via the stopping up process, we would expect the Promoter to take steps to alleviate these concerns at this stage to ensure its CPO contains only necessary and proportionate powers.

Please kindly confirm receipt of this letter.

Yours faithfully



E. A Perry

Hon. Sec.



Director of Environment and Community Services,
London Borough of Richmond upon Thames,
Civic Centre,
44 York Street,
Twickenham,
TW1 3BZ

6 Sep 2022

Dear Sir,

Planning Application 21/2758/FUL.

Objection to The Stopping Up of Highway Land at The Embankment, Water Lane, Wharf Lane and service road leading from Wharf Lane, Twickenham in the London Borough of Richmond upon Thames.

The Eel Pie Island Bridge Company owns and maintains Snapper Bridge (Eel Pie Island Bridge) and the main path on Eel Pie Island for its shareholders.

We are, therefore, concerned that the proposed stopping up order could have a detrimental effect on our shareholders access to the bridge and that the traffic flow that facilitates that access will prove to be inadequate.

It is not at all clear that a move to two-way working in Water Lane is viable. Vehicles moving along the road will, in places, need to proceed on the wrong side of the road. The turn out of Water Lane on to King Street is problematic due to restricted sight lines.

Closing off the route along The Embankment would also necessitate vehicles servicing Eel Pie Island reversing in the vicinity of the bridge to go back up Water Lane. Reversing large vehicles in this area creates safety risks which have not been assessed. The turning area is also on the main cycle route and on the natural route for pedestrians walking along the riverside. There is considerable activity by people launching small craft from the slipway.

The vehicles would be turning in an area that is prone to flooding driven both by high tides and high fluvial flow in the river. Turning in this area with water over the road will be problematic and potentially dangerous with the edge of the river and part of the road obscured.

Questions asked by the Council's traffic officers during the planning application process indicate that they are not convinced about the robustness of the proposals.

The only realistic alternative to two-way working in Water Lane, should this be shown to be impracticable, is to route traffic along The Embankment.

Businesses on the island from time to time need heavy deliveries involving the use of articulated vehicles. It is not always possible to know in advance the type of vehicle a courier will use. The planning application envisages use of The Embankment by these vehicles in a controlled manner but does not give any detail of how this will work. The stopping up order does not acknowledge this requirement.

There does not seem to have been any rigorous assessment of the proposal's practicality, its effect on the general area of central Twickenham or of the safety implications.

In the plan attached to the draft stopping up order, in the central third of the area shown, there is an extension that extends beyond the building line down towards the river. This overlays the part of The Embankment that is shown in the planning application as the swept path for articulated lorries from Water Lane to Wharf Lane. While it can be seen that there would be a need to stop up part of the existing road/footpath to facilitate building the plinth for the Wharf Lane building the necessity of stopping up the area over the swept path is less obvious.

The restriction of traffic along The Embankment envisaged in the planning application can be achieved by a Traffic Management Order as has been done for other roads in the borough. A stopping up order is not required to achieve this.

Changes to parking associated with the development will be introduced by an experimental order while the effects are assessed. Considering the doubts about the viability of the proposed traffic arrangements it would seem prudent to take a similar approach and initially manage traffic by an Experimental Traffic Order.

We, therefore, object to the stopping up of the section of road discussed on the grounds that the aims of the planning application can be achieved without it and it does not meet the test of necessity.

Yours faithfully,



A. Perry
Company Secretary