

From: [redacted]
To: [redacted]
Subject: CPO Twickenham Riverside.doc
Date: 09 May 2023 20:05:36
Attachments: Twickenham Society CPO Section 1.doc
Twickenham Society CPO Section 2 - Safety Audit.doc
Twickenham Society CPO Section 3 Statement of Case.doc



The Twickenham Society

9th May 2023

Miss Rachel Newman, Environment and Planning Team,
The Planning Inspectorate, Room 3A, Eagle Wing,
Temple Quay House, 2 The Square,
Temple Quay, Bristol, BS1 6PN

Dear Ms Newman

**LONDON BOROUGH OF RICHMOND-UPON-THAMES (TWICKENHAM RIVERSIDE) COMPULSORY
PURCHASE ORDER, 2021; THE APPLICATION FOR CERTIFICATION UNDER SECTION 19 AND
PARAGRAPH 6 OF SCHEDULE 3 OF THE ACQUISITION OF LAND ACT, 1981; AND THE PROPOSED
STOPPING-UP HIGHWAY ORDER**

REFERENCES APP/PCU/CPOP/L5810/3286701 AND 3286304

The Twickenham Society objects to the Compulsory Purchase Order made on the 11th October, 2021 (as modified on the 10th March, 2023) 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 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 21 and 28 October and 4th November, 2021 and subsequently.

The Twickenham Society agrees with all the sentiments expressed by a life member of the Society, Mr Paul Velluet, in his letter to the Planning Inspectorate on 8th May, 2023. (see attached).

To make it easier to follow, the Society is submitting its objections in three sections:

Section 1 relates to our worries about the effect this Scheme will have on the Conservation Area of Twickenham Riverside; how it has imposed a building that is out of keeping with the character, appearance and height of not only our historic riverside village but Eel Pie Island and its boatyards; and comparisons with other buildings nearby including the boatyards..

Section 2 is related to the Stage 1 Safety Audit. The Society sets out its reasons why it believes that the audit that the Authority has done is incomplete as it hasn't taken into account all the road users of the extremely busy road junction where Water Lane meets the Embankment. There is no explanation of how road users will be kept safe at a changed road junction, especially when the area is flooded.

Section 3 lists as many as possible of the statements in the CPO Statement of Case and what the Society thinks of each item, both positive and negative. We could have listed many more.

Sue Hamilton-Miller, as Secretary of the Twickenham Society, would like to speak on its behalf at the Planning Inspector's CPO meeting in June.

Yours sincerely,

Doug Orchard
Chairman of The Twickenham Society

copy to
Joanna Vincent <Joanna.Vincent@gateleyhamer.com>

The Twickenham Society

Objection to CPO – Section 1 Conservation Area

Recent History of Site, which is relevant

Following the local elections in May 2018 there was a change of Administration. The existing Planning Application for the site, had achieved a “minded to grant” status at Planning Committee in March 2018 once negotiations had been completed with the Environment Agency. However the new Administration considered that the site had more to offer, withdrew the planning application and started again. It is interesting to compare the outgoing Administration's plans with those on offer today; the developments along Water Lane contained shops and flats, and across the back of the site were more flats (a total altogether of 39 flats, both affordable and private) with a restaurant below. They retained and extended the Diamond Jubilee Gardens and kept the one way system.

In order to develop its own scheme (which has 45 flats) the Council has imposed a Compulsory Purchase Order on the Diamond Jubilee Gardens.

The Twickenham Society opposes this Compulsory Purchase Order for the following reasons.

The Twickenham Society does not agree that the potential impact of the Scheme on the Conservation area has been addressed (11.144)

1. Conservation Area

The London Plan states that the design of all new housing developments should enhance the quality of local places, taking into account physical context; local character; density; tenure and land use mix; and relationships with, and provision of, public, communal and open spaces, taking particular account of the needs of children, disabled and older people.

Policy LP1 states that the Authority will require development to be of high architectural and urban design quality. The policy goes on to describe the need to maintain the high-quality character and heritage of the Borough and then states that development proposals will have to demonstrate a thorough understanding of the Scheme Land and how it relates to its existing context, including character and appearance, and take opportunities to improve the quality and character of buildings, spaces and the local area.

The site of the Twickenham Riverside Scheme land is in the centre of the Twickenham Riverside Conservation area. This Conservation Area is made up of narrow lanes running downhill from the town centre to the quayside. A walk along the footpath between these close-knit houses provides the best way of appreciating the charm and small-scale detail of this historic village core. The path curves gently around the backs of the historic riverside inn, the Barmy Arms, and the Mary Wallace Theatre and eventually emerges halfway up Church Lane giving an attractive view of the Grade II St Mary's Church. This medieval area is clearly visible when viewed from as far away as Radnor Gardens, Ham House and Richmond Hill. Horace Walpole who lived further along the river at Strawberry Hill described his view as “from whence to the left you see the town and church of Twickenham encircling a turn of the river, that looks exactly like a sea-port in miniature”

Several of the Twickenham Society's members live in this area and are distressed at the scale and massing of the proposed scheme, which flies in the face of the Conservation Area designation of

this historical area on the banks of the River Thames. The object of planning in a Conservation area is to conserve and enhance all aspects of character of appearance, including landscape and public spaces that define it.

The Embankment itself is a unique place, well landscaped and with sweeping views of the Thames in both directions and across the river to Eel Pie Island. The tidal nature of the river and the buildings and equipment associated with the working boatyards of Eel Pie Island make an enormous contribution to the interest and character of the Embankment. Eel Pie Island has its own distinct character with its eclectic mixture of river related industries and crucial boatyards that service the important pleasure craft of London (Planning law states that when considering the impact of a proposed development on the significance of a heritage asset such as these boatyards, great weight should be given to the asset's conservation; the more important the asset, the greater the weight to be attributed to the asset's protection). Boatyards, rowing and yacht clubs, an artists' colony, houseboats and barges and various industries, as well as homes for 150 residents, make up this unique island. At either end of the island are nature reserves. Here there is no development, allowing the island to be enjoyed as a natural feature in the landscape when approached from either down or upstream. As a result, the island plays an important role in Twickenham's setting, and in the context of the wider Thames landscape

Residents living on the Embankment point out that last year a neighbour sought to add a single storey extension to their small cottage but planning permission was refused because it failed to reflect the character, appearance and height of adjoining buildings in the Conservation Area – but these rules were not applied to the scheme now before us. Instead the Authority looked to the area at the back of the site (King Street) for justification of its massive and over-bearing Wharf Lane building even though it is taller than all the King Street buildings. It claims that it contributes positively to the pastoral character of this stretch of the Arcadian Thames. The island and the Conservation core of Twickenham Riverside is what the Authority should have based its scheme on in terms of design and massing. Instead it chose King Street and the King Street shops, neither of which are in the Conservation area.

N.B. (Executive Summary – Special meeting of the Planning Committee when planning permission was granted) The northern elevation of the Wharf Lane building will be prominent in Wharf Lane, and unfortunately the design and detail of this elevation is inferior to other elevations and appears flat, with the lack of overhangs, balconies and modulation. Further the entrance of the office appears insignificant and lost. The applicants claim balconies are not possible in response to the arrangements of the flats and deem the ventilation recesses above the windows add depth and articulation. Regardless this is regrettable for a new build not to be designed and arranged internally to ensure all elevations are of the same quality.

The granting of Planning Permission and the Compulsory Purchase Order of the Diamond Jubilee Gardens basically seeks to place on these popular gardens buildings that do not enhance this small historic waterfront town, which should remain a haven within a town centre. If the river drives what is done to the site its heritage will be preserved, the existing river-related uses such as the boatyards and riparian clubs of Eel Pie Island will be respected and its distinctive character will attract visitors and refresh residents in a way no overbearing block of flats with yet another pub will do.

Policy LP2 (Building heights) states that the Authority will require new buildings to respect and strengthen the setting of the borough's valued townscapes and landscapes through appropriate building heights. **New buildings should generally reflect prevailing heights** and where they are taller have to be of high architectural design and quality and also deliver public realm benefits. The Authority's Statement of Case says the Wharf Lane building is situated on the riverbank and is therefore more fundamentally part of the riverine character of the Thames; that the design takes its

cues from river industry, particularly the boathouses and boatyards on Eel Pie Island. But see below the heights of these boatyards adjacent to Phoenix Wharf. And then look at the comparison of heights of the Wharf Lane building next to that of the old Barclays Bank on King Street, the clock tower building (Addison Court) at the King Street/Heath Road junction and Phoenix Wharf building next to the biggest boat yard on Eel Pie Island. They say a picture speaks a thousand words.

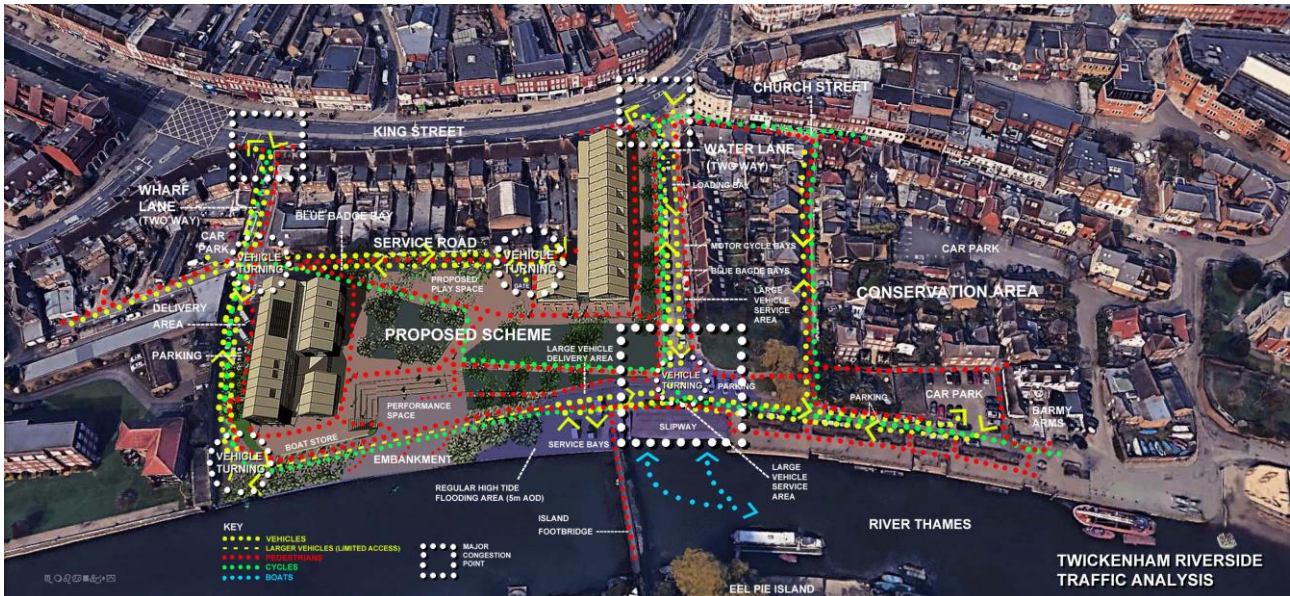


HEIGHT COMPARISON



The Twickenham Society

Objection to CPO – Section 2. Stage 1 Safety Audit



The site, including part of the adjacent Conservation Area

The Twickenham Society remains deeply concerned about the safety aspects for all road users at the junction of Water Lane and the Embankment in spite of the CPO Statement of Case stating the following.

“11.27As part of the planning determination process, a Stage 1 Road Safety Audit was commissioned by the Council and undertaken by independent engineers in February 2022, with an associated Stage 1 Design Response provided by WSP, the Scheme Transport Consultants. Within this, suitable responses and mitigation were provided on all issues of highway safety, pedestrian and cyclist amenity in relation to the wider masterplan. The Transport Assessment (CD 3.14) confirms that there are no outstanding safety audits.”

A Stage 2 Safety Audit is to be done as one of the planning conditions

Under Section 39 of the 1988 Road Traffic Act Richmond upon Thames Council has a statutory duty to take steps both to reduce and prevent accidents. Councillors have a duty of care to make sure that people are kept safe in public spaces such as parks and roads, especially when changes are made to them. The total lack of **full** safety audits on roads layouts which have been changed, and of this junction in particular is contrary to their legal obligations. Planning Permission should not have been sought until these essential **Stage 1 Safety Audits, taking into account our concerns below**, had been done to the satisfaction of both the Transport Department and its outside auditors, who worked in an office in Slough and (as they pointed out) could only work with the documents they had been given. Their recommendation in the first Stage 1 Safety Audit that they did was to keep the one way system.

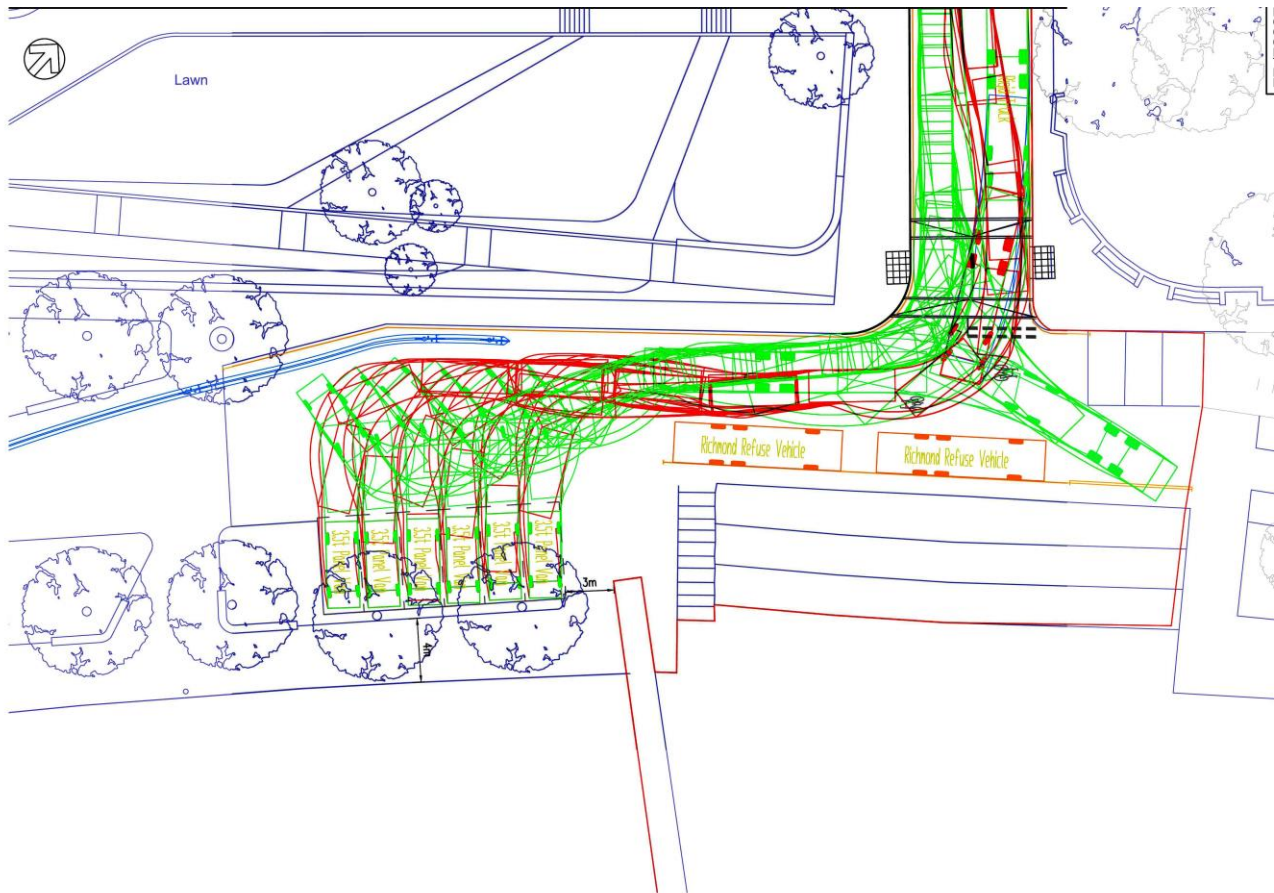
To appreciate our concerns for this extremely busy junction at the bottom of Water Lane where it meets the Embankment, it is important to recognise the following:

The Embankment itself runs from the bottom of Wharf Lane, past Water Lane, past the Balmy Arms and right up to Church Lane beside St Mary's Church.. The only part of all the roads in the whole site that is planned exclusively for pedestrians and cyclists is 70 metres found between the bollards in front of the Diamond Jubilee Gardens on the Embankment (pictured orange), but between the hours of 7 a.m. - 10 a.m. this area too will be shared with vehicles.



To look at the Water Road/Embankment Junction in more detail:

Below are the combined swept paths relating to both the Service Vehicles parked next to the Eel Pie Island Bridge and the larger vehicles loading and unloading alongside the slipway when the refuse vehicles are parked up. To the right you can see where there will be 3 Pay and Display parking spaces.



These swept paths reflect what can be done under ideal conditions but what if it is a dark January morning, or the road is flooded?

In this extremely busy area there will be:

Vehicles.

- turning right when coming down Water Lane to park in the service area to the right of Eel Pie Island bridge (see swept paths above)
- turning left to continue down the Embankment to service houses situated in Bell Lane and further along the Embankment
- turning left to reach the CPZ parking area on both sides of the Embankment, the square adjacent to the Barmy Arms or a couple of houses with drives in Bell Lane.
- turning left in order to park in one of the three parking places in front of the grassy mound.
- doing three point turns to exit Water Lane from the loading bays on Water Lane and the disabled parking bays
- manoeuvring in order to park alongside the slipway e.g. refuse lorries and articulated lorries. (see swept paths above)

Vehicles will also be approaching the area from both the right and left of the Embankment in order to exit up Water Lane.

Cyclists

Cyclists will be coming from every direction, including over Eel Pie Island bridge.

Pedestrians – adults, children, disabled, elderly, sight impaired.

As stated in the RIBA Brief:

*Eel Pie Island, which is opposite the site, is home to around 150 inhabitants in 50 dwellings; 30 businesses employing nearly 300 people and sports clubs with over 650 members. It is a car-free island and (other than occasional deliveries by boat when tides allow) access for residents and deliveries is entirely reliant on the footbridge from the Embankment (which falls inside the site boundary). It has four of the last remaining working boatyards on the tidal Thames, a long tradition of music (the former Eel Pie Island Club hosted early gigs by The Rolling Stones, The Who, and David Bowie) and now home to several artists and high tech and creative industries. **Any proposal will need to ensure that the island's unusual access and servicing arrangements for all these are fully understood and appropriately accommodated.***

So first and foremost - pedestrians and cyclists are crossing the site **from all directions** in order to reach/leave the Eel Pie Island bridge for all the above reasons – and this won't change..

Other pedestrians will be crossing this junction to:

- reach their homes in Bell Lane, along the Embankment and Water Lane
- visit the Diamond Jubilee Gardens
- visit events on the Diamond Jubilee Gardens
- visit the Barmy Arms (particularly busy on Rugby match days)
- visit the Mary Wallace Theatre
- cut through to the Church
- feed the ducks,
- launch boats into the water at the slipway
- reach their parked cars along the Embankment
- reach their cars parked in front of the grassy knoll
- visit Eel Pie Island's Open days, when 2000 people a day cross the bridge
- fish at the foot of the bridge
- launch paddle boards
- follow the Thames Path.

The only one of the above to be eliminated in the new plans is where people will be coming and going from their cars parked in front of the Diamond Jubilee Gardens. These numbers however will be replaced by all those wishing to visit the new development for whatever reason, whether they live there, work in the new buildings or want just to visit.

The Administration tells us that at the junctions there will be many fewer vehicles and that they will be going very slowly, so safety concerns are minimal.

A swan was killed by a reversing SUV in the summer of 2021. The tide was coming in, the vehicle's sensors were disabled and constantly bleeping because they were under water so the driver couldn't tell if there was actually anything behind him. People were screaming at him to stop but he didn't and the swan was killed in front of them. It could just as easily have been a child, an elderly resident or someone disabled who couldn't get out of the way in time.

Last summer a lorry driver had to be rescued by the Fire Brigade because his vehicle had slipped into the Thames by the slipway. He was driving a skip lorry, was very used to the area, but the edge of the slipway was concealed by the tide.

Neither of these accidents were to do with level of traffic or speed of travel.

With road safety aspects paramount these issues must be resolved satisfactorily before embarking on a CPO. **All these safety concerns will be exacerbated when the construction traffic moves in and shares the area.**

Where is the Safety Audit that covers what happens to vehicles on the many days when the Embankment floods and vehicles need to move out of the way in order to protect their vehicles.?

At the moment service vehicles parked alongside the bridge exit forwards along the Embankment and up Wharf Lane. Now they will be expected to come back through the water in order to go up Water Lane. How will other vehicles be able to make a three point turn at this junction when the edge of the slipway can't be seen?

And what about when this area floods on a regular basis?



To quote again: *“suitable responses and mitigation were provided on all issues of highway safety, pedestrian and cyclist amenity in relation to the wider masterplan. The Transport Assessment (CD 3.14) **confirms that there are no outstanding safety audits.**”*

The Safety Audit summary: for the junctions mouths of Wharf Lane and Water Lane where they say that there are no outstanding safety audits:

Detail: It is proposed to provide raised tables at the junctions of Wharf Lane and Water Lane. The details of the surfacing have not been provided. However, if the raised tables are installed in a similar way to the existing, then there will not be a significant colour contrast between the surface of the carriageway and the footway. There is a risk that pedestrians with sight impairments may enter the road without realising and come into conflict with traffic, resulting in pedestrian injury.

Recommendation: Provide suitable high-contrast tactile paving on the footway at the pedestrian crossing points, to warn pedestrians with sight impairments that they are entering a traffic environment.

It should be noted that the nature of the proposals, which focus on pedestrian priority and active travel throughout the masterplan will contribute towards a safer environment for pedestrians and cyclists, due to the removal of traffic associated with the public car park, public realm created along the Embankment and new junction treatments along Water Lane, Wharf Lane and their junctions.

And that's it! So to repeat:

11.27As part of the planning determination process, a Stage 1 Road Safety Audit was commissioned by the Council and undertaken by independent engineers in February 2022, with an associated Stage 1 Design Response provided by WSP, the Scheme Transport Consultants. Within this, suitable responses and mitigation were provided on all issues of highway safety, pedestrian and cyclist amenity in relation to the wider masterplan. The Transport Assessment (CD 3.14) confirms that there are no outstanding safety audits.

The Twickenham Society also wishes to make the following comments on the
LBRuT Statement of Case (Section 3)

6.27 The Twickenham Society points out that the pontoon can be built and the slipway improvements can take place without the scheme going forward.

6.42 The Twickenham Society does not agree that the potential impact of the Scheme on the Conservation area has been addressed

6.66 The Twickenham Society agrees with the following: “when considering the impact of a proposed development on the significance of a heritage asset, paragraph 199 (in the National Planning Policy Framework) states that great weight should be given to the asset's conservation; the more important the asset, the greater the weight to be attributed to the asset's protection.”

6.28.6 The Twickenham Society notes the NPF requirement to protect, respect, contribute to and enhance trees and landscapes through protection of existing trees of townscape or amenity value and provision of new trees. The Scheme would remove 66 trees from the site.

6.55.4 The Twickenham Society agrees with the removal of parking along the Embankment in front of the Diamond Jubilee Gardens as long as it doesn't prejudice Eel Pie Island and its important boatyards in any way.

6.55.5 The Twickenham Society questions whether the scheme would enhance events because of its size and siting. As events such as cinema shows and ice rinks need time to set up, and also, because of their cost, can last for several days, if not weeks, it could mean closing the Embankment Road for long periods in order to enable them to take place. This would not be feasible.

6.55.30 The Twickenham Society does not believe that the Exchange Land is “equally advantageous” regarding its functionality, and its environment. In addition to the nonsense of including pavement in front of shops, it will consist of land down on a road (which remains a cyclepath when not open to vehicles) on a flood plain, and includes stepped areas that will be inaccessible to the elderly, disabled, small

children and those with sight problems. Nor will the removal of 66 trees, including healthy mature trees, add to the environmental wellbeing of the area.

8.53 The Twickenham Society does not agree that a scheme cannot be delivered without acquiring part of the existing designated open space. The 2017 scheme showed that it was possible to develop the area without destroying virtually all the improvements to Twickenham Riverside that had been made to date.

10.04 The Twickenham Society notes that until the 111 conditions, imposed by the Planning Committee, have been met then the following statement is not correct: “It is not considered that there are any planning or other impediments to the implementation of the Scheme as planning permission has been granted and the funding required has been approved by the Committee”

One of the more minor conditions NS108 Hours of use – Public House states that “Customers shall not be present at the outside dining areas of the public house/restaurant in Wharf Lane during the following times: before 9 a.m. and after 21.00” What happens on a summer's day or when an event is taking place on the Embankment? How will this be policed?

10.04 .2 The Twickenham Society agrees with the reduction of car dominance on the Embankment.

10.04.6 The Twickenham Society agrees that this is a UNIQUE riverside setting.

10.04.22 The Twickenham Society does not agree that the Wharf Lane building is sympathetic to the area.

10.25 The Twickenham Society points out that there are four boatyards on Eel Pie Island.

10.33 The Twickenham Society agrees with “removing aged and poorly designed existing buildings.”

10.49 The Twickenham Society points out that all previous schemes failed because

inappropriate buildings were imposed on the site and people wanted open space, not blocks of flats or luxury private housing. (Please refer to opening statement headed “Section 1 - Conservation”)

The Authority could have tweaked a nearly oven-ready plan in 2018 but chose to start again. The previous scheme also kept the Diamond Jubilee Gardens where it is and the one way system.

The Environment Agency was in discussion about the placement of the flood wall in the underground car park and we were told that the matter was making good progress when the Administration changed as a result of the May 2018 Local Elections. The Twickenham Society points out that over the past 18 years a previous administration built both the Jubilee Gardens, the Diamond Jubilee Gardens with its playground and cafe; restored the Embankment, built the Sculpture Garden with its playground adjacent to Champion's Wharf and the Terrace Garden opposite Eel Pie Island bridge. All except the Sculpture Garden and its playground are now to be demolished, wasting £millions of council tax payers' money. The “derelict area” at present consists of the area behind the hoarding with its derelict buildings, and the old car park (through which vehicles were able to make an escape from Water Lane along the Service Road when the riverside flooded). The Santander block was purchased in 2015 order to make possible the Water Lane area for redevelopment en bloc.

10.49.12 The Twickenham Society approves of an Experimental Traffic Order to assess any damage that may be caused to local residents and businesses by the removal of 82 parking spaces in the centre of town. Why has this not happened yet?

11.14 The Twickenham Society notes that only 220 respondents during the January – February 2021 engagement period commented that they liked the removal of parking, though this was the most positively commented upon aspect of the Scheme (N.B. There are more than 10,000 residents living in the immediate area).

11.187 The Twickenham Society agrees with the responders to the questionnaire that the scheme should have “open space, greenery, views of the river”.

11.192 The Twickenham Society disagrees with the statement that tides are

predictable, as they are also governed by several unpredictable conditions e.g. land water happening. The degree to which there will be less vehicular traffic cannot be stated until the results are known of an Experimental Traffic Management Order that has yet to be carried out regarding the removal of parking from 82 parking places on the site.

11.233 The Twickenham Society does not agree with the statement that the riverside is cut off from the town centre. This is evidenced by the facts that 2000 people a day manage to find their way to the Eel Pie Island Open Days, and the popular events on the Diamond Jubilee Gardens are packed out.

11.93 The Twickenham Society notes that the development has been designed to be fully accessible from north, south, east and west. The Council only has to develop its land to the east of the Diamond Jubilee Gardens for access from this direction to become possible now. It is regrettable that the large area of tiered seating will be inaccessible to the elderly and the disabled, as well as potentially dangerous for them as well as children and people with limited sight.

11.101 The Twickenham Society remains concerned at the position of the children's playground adjacent to the service road. This road will be busier as it will be servicing the flats on Water Lane as well as the restaurant and the King Street shops and flats above.. There is also concern at the position of the turning circle between the unfenced playground and the cafe. It would only take a moment for a toddler to leave the unfenced playground or cafe outside area and wander into this turning space.

11.22 The Twickenham Society notes the statement that the new residential units would be car free and therefore wouldn't be contributing to any existing traffic. This is obviously ludicrous as they will have the same needs as other home owners with deliveries, servicing, visitors, health visitors etc. as will the Water Lane flats.

11.22.33 The Twickenham Society points out that the Embankment runs from Wharf Lane to Church Lane. The pedestrians/cyclists shared surface will only be vehicle free between 10 a.m. until 7 a.m. the next day and involves only 70 metres of road in front of the Diamond Jubilee Gardens. (See Section 2 -Safety Audit)

11.22.36 The Twickenham Society notes that the numbers of articulated lorries needing to exit via the Embankment and Wharf Lane are incorrect (see EPIA for true figures).

11.22.44 The Twickenham Society points out that Safety issues as a result of highway layout changes on the Embankment/Water Lane junction have not been addressed. (see Section 2)

11.22.58 The Twickenham Society does not agree with the statement that the Wharf Lane building is necessary for the scheme. A building on Wharf Lane was not deemed necessary in the viability of the very similar scheme that the Authority cancelled. As the Scheme is no longer viable this statement is irrelevant. The removal of this overbearing block of flats will no longer put the proposed children's playground in the shade, particularly in the winter months when they need sun to help growing bones.

The Twickenham Society points out that the town centre is not in the Conservation area, nor is the block of King Street shops and flats above. (see Conservation Area – Section 1)

11.64 /11.69 (please see our comments on Conservation Area – Section 1).

The Twickenham Society does not agree that there is a need for another pub. The Barmy Arms is a few yards away from the site on the Embankment and there are a further 16+ pubs within close proximity..How confident is the Authority that another licence in this area would be issued (note that Cumulative Impact Zone issues are resisting the giving of new licences in central Twickenham in order to protect those pubs already there)

11.77 The Twickenham Society takes issue with the statement made by Avison Young that “Twickenham town centre lacks a good quality 'gastro pub'/brasserie'. Did they not visit Church Street and its numerous excellent establishments? The Twickenham Society recommends that they visit the Taste of Twickenham Festival to sample the rich offerings of our town.

11.80 The Twickenham Society notes that the Council makes mention of its own derelict buildings, car park and open space (presumably the area behind the hoarding). The Twickenham Society looks forward to this area being developed and opened up to the public.

11.112 The Twickenham Society is supportive of the Twickenham Riverside Trust in the way it has kept children, the disabled and the elderly safe in the enclosed gardens, well above the flood plain and away from the river's edge. The proposed scheme removes this safety aspect for this vulnerable group.

11.115 The Twickenham Society does not support the removal of 66 trees from the site, including the Black Poplar and the two Cataplas, leaving only one mature hornbeam, especially as we were assured repeatedly that the hornbeams would remain.

11.121 The Twickenham Society regrets the Events Space being located on a flood plain with a road running through it. It asks – how will ice rinks and cinemas be able to set up and remain there? It is also understood that the Farmers Market has indicated more emphatically that it does not want to move from its current location in the Holly Road Car Park where they have a guaranteed slot for their vans and won't be affected by the tides on the flood plain.

11.123 The Twickenham Society points out that the existing gardens will have the ability to have accessible entrances from all directions once the derelict buildings, car park and area behind the hoarding have been developed. By integrating a development on Water Lane with the Diamond Jubilee Gardens the site will become fully accessible, as in the 2017 scheme.

11.173 The Twickenham Society supports the Twickenham Riverside Trust in fulfilling their obligations to the Charity Commission.

11.303 The Twickenham Society wishes to point out that the petition with 3000 signatures relates to a 2017 concept scheme drawn up by Deon Lombard of the Twickenham Riverside Park Team and was signed not only by local residents but

people all around the world (following paid-for online promotion to cyclists).

11.64 The Twickenham Society has commented on the height of the Wharf Lane building in Section 1 – Conservation Order.

11.64.11 The Twickenham Society is concerned that there may be a negative effect on disabled people accessing the site by car due to the removal of parking from the Embankment between Water and Wharf Lane.

Please see Sections 1 and 2 for further details of the Twickenham Society's comments on the Statement of Case.

PAUL VELLUET,
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Miss Rachel Newman, Environment and Planning Team,
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8th May, 2023

Dear Ms Newman,

LONDON BOROUGH OF RICHMOND-UPON-THAMES (TWICKENHAM RIVERSIDE) COMPULSORY PURCHASE ORDER, 2021; THE APPLICATION FOR CERTIFICATION UNDER SECTION 19 AND PARAGRAPH 6 OF SCHEDULE 3 OF THE ACQUISITION OF LAND ACT, 1981; AND THE PROPOSED STOPPING-UP HIGHWAY ORDER

REFERENCES APP/PCU/CPOP/L5810/3286701 AND 3286304

I am writing in an independent capacity as a resident of Twickenham since 1982 and as a chartered architect with some forty-five years experience in planning and development in historic areas, including time as Regional Architect and an Assistant Regional Director of English Heritage, London Region; as a member of the Richmond-upon-Thames Council's former Conservation Areas Advisory Committee; as a member of the former Thames Landscape Strategy Panel of the Royal Fine Art Commission; as a former member of the RIBA's Planning Group and National Awards Group; as a former Chairman of the Richmond Society; and as Life Member of the Twickenham Society.

I am setting out this submission further to my letter addressed to the Secretary of State for Levelling up, Housing and Communities of the 22nd November, 2021 to convey my support for the submissions made by the Twickenham Riverside Trust, the Twickenham Society and others in the local community in objecting to the Compulsory Purchase Order made on the 11th October, 2021 (as modified on the 10th March, 2023) 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 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, 2021, and subsequently. I would also refer to my submission to the Council of the 27th February, 2023 objecting to the proposed Stopping-up Order (see attached).

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 very extensive documentation – specifically, in order to facilitate the implementation of the development proposals submitted on behalf of the Council for which Planning Permission (reference 21/2758/FUL), was granted by the Council itself on 21st December, 2022.

It is my firm view that the approved scheme of development insofar as it relates to the land presently occupied by the Diamond Jubilee Gardens and other areas of open space and adjacent building, is fundamentally flawed for the reasons set out clearly and fully in my submissions to the Council of the 22nd November, 2021 and 20th July, 2022 (see attached) in response to the original and amended application for Planning Permission, as well as being in conflict with relevant local, London-wide and national planning policies.

The approved scheme not only proposes the entirely unjustified elimination of the much valued Diamond Jubilee Gardens without its replacement with public open space of equal or greater amenity value, delivering equal or greater safety for pedestrians, but also proposes the non-sustainable destruction of the attractively landscaped riverside walk – only created some twenty years ago; the replacement of the existing much used and safe children's playground and adjacent small café within the Diamond Jubilee Gardens with a five-storey block of private housing and a pub-restaurant; the loss of some thirty, healthy trees across the site; the vain attempt to create replacement public open space with a fragmented series of modestly sized, expensive-to-maintain, grassed areas and a vast, hard-paved space, criss-crossed by cycle-routes and susceptible to flooding; and the displacement of some eighty parking-places meeting the needs of local residents, shoppers, businesses, users of the local theatre, Parish Church and Hall and other visitors to Twickenham into surrounding residential and other streets. Instead of focussing appropriately scaled and sensitively designed new, built development on the site of the long derelict, Council-owned properties extending down the south-western side of Water Lane, the Council is perversely pursuing the expensive and high-risk redevelopment of the entire Twickenham Riverside Site, despite the repeated and soundly considered representations of many in the local community over the last three years.

Importantly, despite the extraordinary and exaggerated claims made by the Council leadership and the three, present local riverside councillors and one former councillor, the approved scheme fails to deliver the laudable, regenerative objectives of the original RIBA *Competition Brief* of March, 2019.

Accordingly, I urge the Secretary State to decline to confirm the Order.

Kind regards,

Paul Velluet.

Copy to The Twickenham Society.

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

27th February, 2023.

Dear Mr Chadwick,

PROPOSED STOPPING-UP ORDER UNDER SECTION 247 OF THE TOWN AND COUNTRY PLANNING ACT, 1990, RELATING TO AREAS OF PUBLIC HIGHWAY COMPRISING PARTS OF THE EMBANKMENT, WATER LANE, WHARF LANE AND THE SERVICE ROAD LEADING NORTH-EASTWARDS FROM WHARF LANE, TWICKENHAM, REQUIRED IN ORDER TO IMPLEMENT THE PLANNING PERMISSION DATED 21st DECEMBER, 2022, FOR THE DEVELOPMENT OF THE TWICKENHAM RIVERSIDE SITE, REFERENCE 21/2758/FUL

I am writing in a personal capacity in response to the formal Notice published on page 32 of the 2nd February, 2023 issue of *The Richmond and Twickenham Times*, to object to the proposed 'stopping-up' of the areas of public highway which are the subject of the order for the sound reasons set out in the attached letter of the 21st February, 2023 from the Chairman of the Twickenham Society of which I am a Life Member.

The concerns expressed by the local community in relation to the highly contentious highways issues related to the much vaunted but fundamentally defective development proposals for the Council-owned site advanced by the Council itself and approved by the Council itself clearly need to be addressed fully, independently and objectively through the Public Inquiry process.

Given the 2nd March deadline for the submission of objections, I am sending copies of this letter in the first-class post, by e-mail and by direct delivery to the Civic Centre.

Yours sincerely,

Paul Velluet.

Copies to: Ms Munira Wilson, MP and The Twickenham Society.

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PROPOSALS FOR THE DEVELOPMENT OF THE TWICKENHAM RIVERSIDE SITE

DETAILED COMMENTS IN RESPONSE TO THE ADDITIONAL DRAWINGS, REPORTS AND OTHER DOCUMENTATION SUBMITTED ON THE 20th DECEMBER, 2021 AND PUBLISHED ON THE 25th FEBRUARY, 2022 IN SUPPORT OF APPLICATION FOR PLANNING PERMISSION – REFERENCE 21/2758 – JULY, 2022

These comments respond to the additional drawings, reports and other documentation submitted by Savills on behalf of the Council as the prospective developer to the Council as local planning authority with their eight-page letter dated 20th December, 2021, but not published by the Council and notified to those who have commented on the proposals previously until the 25th February, 2022, and are submitted in the continuing absence of any indication of when the application for Planning Permission, first submitted in August, 2021, is to be considered and determined.

These comments should be read in conjunction with my earlier, initial comments on the application for Planning Permission as submitted to the Council on the 24th September, 2021 and my more detailed comments as submitted to the Council on 23rd November, 2021 – copies of which I attach.

Having inspected and read through the 20 'revised drawings' (sic) and 22 'reports' listed on the Council's planning applications web-site as having been published on the 25th February, 2022 and considered the amended and additional information set out in that documentation, I very much regret to confirm my view that they contribute little to resolving the fundamental deficiencies of the proposals as first submitted, to which I drew attention in my submissions of September and November, 2021.

As I stated in my submission of the 23rd November, 2021, 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.

In relation to the submitted additional drawings, it is extraordinary that almost a year after the submission of the original application for Planning Permission, three of Hopkins Architects' drawings (nos. SK224 revision COI, 225 revision COI and 226 revision COI) are marked as 'Draft' and carry the following 'health warning':

'This drawing has been produced for illustrative purposes only is not based on accurate survey information. The layout is still subject to design development and this is deemed to be acknowledged by all parties if this drawing is used for legal purposes.

Proposed buildings and landscaping subject to design development, which may affect boundary conditions and areas. Wharf Lane podium edge subject to change. Landscape design and levels subject to change following further design development'.

Such qualifications reflect much of the way that the proposals for the development of the Twickenham Riverside Site are being directed and managed by the Council.

As I stated in the conclusion to my submission of the 23rd November, the Council would be well advised to withdraw the current application and review and revise the 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, and 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
July, 2022.

20th

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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.**

22nd

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.