

e e l p i e b o a t y a r d

[Re : London Borough of Richmond Upon Thames \(Twickenham Riverside\) Compulsory Purchase Order 2021, Compulsory Purchase of Land and New Rights in Twickenham Riverside](#)

08/05/23

We are owners and managers of one of the 4 boatyards on Eel Pie Island, we have been running Eel Pie Boatyard Ltd for 25 years. We share access with the other boatyards and have an everyday working knowledge of the other boatyards and river related activities on Eel Pie Island.

We have also been part of discussions with the Twickenham Riverside team as chair and members of Eel Pie Island Association.

We live and work on Eel Pie Island and have local knowledge of the Thames at Twickenham and the local area and are part of Twickenham's Working Waterfront. We attach a pdf of a presentation given by Eel Pie Boatyard Ltd 2016

Just to give the whole picture of the Twickenham Working Waterfront.

We object to the above Compulsory Purchase Order of the lands and New Rights in Twickenham Riverside for the following reasons.

POINT 1. The site is opposite Eel Pie Island a unique location with the only access via a footbridge falling within the site boundary.

- Eel Pie Island Bridge and The Embankment at Water Lane is the infrastructure that enables all the mix of activities and the Twickenham Working Waterfront and where everyone get all their deliveries.

In response to 11.36“it is the Council’s understanding that vehicles of this size are infrequent (around 3-4 time per year),

- Large trucks for the boatyard delivering steel/timber are job related.
- 5 Steel deliveries this month at Eel Pie Boatyard due to manufacture of gangplank and brow and replating a large vessel.
- The number of raw materials needed are determined when the vessel is out of the water it might need a complete overhaul or patching.
- The Boatyard businesses on the Island must be able to order and have deliveries without constraints on how many large vehicles approach the site.
- All the suppliers’ trucks are driver only, offloading takes place using hijab cranes or drop tail lifts etc. Large vehicles egress along the Embankment and circulate and leave safely and independently via Wharf Lane. There are no banksmen.

- Industry standard for the deliveries on Eel Pie Island – Once delivery day is confirmed the driver will generally give 45 mins – 1 hour notice to the yard of arrival. Negotiations and exact timings are not able to be dictated by the customer.
- The boatyards trolleys are shared by the whole Island to enable large deliveries on and off the island.
- There are 30+ self-employed craftspeople and artists in all the boatyards and they manage their own deliveries.
- The loading bays are all full and it is commonplace to see at least 2 large trucks at the same time parking on single yellow line both sides of the Embankment Road.

In response 11.37.....**Scheme and there would be a dedicated servicing area for the Island next to the bridge which would include 6 loading bays. This would represent an improvement to the current situation**

- To clarify this is to enable 3 parked up servicing bays where subcontractor's and trades people can park close to the bridge and because of the loss of pay and display parking. This is not an increase/improvement in loading bays. They are now closer to river. (Floodzone)
- The high tide floods the proposed service area at the bottom of Water Lane, on high spring times and when the river is in flood due to heavy rainfall or tidal surge.
- Vehicle turning is not possible at high tides, egress must be via the Embankment and Wharf Lane.

In response 10.10.3 **Maintenance of the Embankment as a working quay through the retention of servicing/parking bays for Eel Pie Island, controlled servicing access along the Embankment and retention of one mooring.**

- The planning permission was given subject to planning conditions NS22, NS23 and NS25
- These are practical details that have not been addressed; it is not a working quay.
- Overarching concerns regarding safety, practicality (two-way working and turning) and functionality were expressed at every EPIA meeting with the team.
- Attached in the appendix are the EPIA meeting notes and representations during the consultation period.

POINT 2 The exchange land contains the Embankment Road, which is our access and highway.

- It is relevant to note that the Twickenham Area Action Plan (TAAP) which features heavily in the statement of case as justification for the development recommends retention of the circulation.

Map 7.12 Twickenham Riverside and Approaches Principles



- This shared surface and pedestrian priority is used currently, at weekends the pedestrians truly take priority, and a Village atmosphere is set on the Twickenham Embankment.
- This access that is in the public realm should not be part of the exchange land, there will always need to be access along the Embankment.

Statement of Case

11.39”The Embankment would continue to be accessible within the Scheme”

POINT 3 A stopping up order was not included in the recent planning application relevant to the site.

- The stopping up order land pushes the necessary access for larger vehicles closer to the river edge.
- Narrowing the road on the corner by the proposed plinth and additional landscaping creates blind spots for pedestrians and cyclists etc. Safety management required.
- Modifications to the stopping order include plots of land that involve change of uses that need further discussion.
- The corner of the Embankment with Wharf Lane and the River needs protection from traffic manoeuvring.

POINT 4 : This road gives safe access for all vehicles to circulate and load and unload and is essential infrastructure for our everyday life.

In Response to 11.33 Stage 1 Road Safety Audit.....will be taken forward in the Stage 2 Road Safety Audit

- Overarching concerns of regarding safety, practicality (two-way working and turning) and functionality were expressed at every EPIA meeting with the team.
- Attached in the appendix are the EPIA meeting notes and representations during the consultation period.
- Stage 1 Road Safety Audit original recommendation below, this does not appear to be in any of the transport assessments anymore. Why?
- Stage 2 safety orders need to take place, given that this has been a running theme through all meetings with EPIA and objections it is baffling why it still has not taken place.
- The council are not able to answer the valid concerns of local current and existing users of the Twickenham Riverside Area

Transport assessment part 4 of 5 Appendix G – Road Safety Audit Stage 1 (original Stage 1 safety Audit) stated:

“3.2.1.....

Recommendation

“If possible, retain the one-way arrangement for Wharf Lane and Water Lane.....”

In response to 11.32 states “The highway (roadway) element remains unchanged, with the exception of the removal of some on street parking to allow for two-way movements.”

- 11.32 relates to Water Lane.
- The impact of the closure of Church Street created a new service bay at the top of Water Lane.
- Large vehicles unloading are parked up for longer periods as drivers walk down Church Street to deliver their stock.
- These deliveries will bring more turning traffic at the bottom of Water Lane
- It is a narrow street and two-way working with the number of service vehicles does not look feasible.

Statement of Case 11.36 ...” This is a key priority in the TAAP(CD2.5), which seeks to reduce the impact of motorised traffic and car parking. It was also an ambition of the Scheme to deliver a pedestrian priority area on the river.

- The use of a turning circle at the bottom of Water Lane and the two-way traffic and manoeuvring of vehicles, does not reduce the impact of motorised traffic at the Riverside.
- This area has a ramp from the proposed area coming straight into the road with the possibility of children on scooters. Safety concerns.

- This area has children/families looking at the river and the wildlife.
- This area is for loading and unloading materials.
- This area is used to launch paddleboard and canoes.
- This area has an established ice-cream van that is visible from Water Lane and a natural draw to the river. (It moves with the tides and the deliveries)
- The impact of the motorised traffic at the turning circle is relevant and significant and will have detrimental impact on current public uses and public safety.



POINT 5 This road closure will be detrimental to the public who use currently use this highway.

In Response to 10.12 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.....

- The road closure will have a significant detrimental impact on all current users of the Twickenham Riverside Area especially the businesses, clubs and residents on Eel Pie Island and the surrounding area.
- The proposed servicing area does not equal or better what is currently available.
- The loss of safe circulation and the ability for visitors/tradesmen/carers/customers/subcontractors to park on the embankment and then carry tools, equipment over the bridge and use their vehicles as a base is detrimental.
- Dropping stuff off then having to find a parking space is problematic.
- It will have significant impact on the elderly, single parents and less able people, having to unload before parking etc.
- High Tide Grid Lock for vehicles.
- Construction of the development if it goes ahead needs a masterplan with local consultation and practical solutions to be found.

POINT 6 The road enables equality of access to the public of any ability to have direct access to the River Thames in Twickenham.

- There are very few places where the road and river still meet.
- It is currently the most accessible Riverside in the borough.
- The current road allows visitors to come to the Riverside with the pay and display parking.
- Twickenham Riverside is so accessible, it is a common site to see a family with at least 3 generations come to spill out the car and they walk the promenade at the pace of the youngest and the eldest family member. (no blue badge generally)
- Paddleboards, inflatable canoes, small dinghies small craft, the infrastructure of the slipway and Waterman's steps enable these uses.
- During the 2020 and 2021 lockdowns the use of the embankment for small craft on Twickenham Embankment was truly recreational and the busiest. Whilst delivering a boat to the Medway during lockdown, there was not another stretch of the Thames with as many people simply enjoying being on the water, as the immediate area near Eel Pie Island.
- Families with neuro atypical children come here to see the water.
- The planting and the benches provide a place to come to and be close to the waters edge without retail pressure but just to get away from it all briefly.
- It is well used and important to the area. During the 2020 and 2021 lockdowns the use of the embankment seating in the area in the photograph was vital for the public well-being.
- The mental health benefits of being able to have your own relationship with the river, in a safe space not far from help if needed, is important. The fact that it is not a thoroughfare and truncated allows the observer true reflection, and a feeling of ownership with the river without people coming past interrupting the thought processes.
- Running a boatyard in this area for the past 25 years, has been an insight on how important the access to the river is for individuals.
- The impact of bringing an event space down to the river and attracting crowds could change the whole nature of the Embankment and its recreational uses.
- This development has the potential to change this area so much the well-being for some of the most vulnerable people in our society are at risk and the general well-being of the public at large.

POINT 7 The purpose for which the Council is proposing to acquire the land can be achieved by other means.

















- Adherence to the plan in the TAAP Map 7.14 with designated uses.
- Outline planning was given for a scheme that kept the access way and allowed the local community to keep their infrastructure and go about their daily lives.

- It was never followed through because of a change in administration.
- Diamond Jubilee Garden retained, and the derelict buildings be redeveloped.
- The high street has lost nearly all the banks, there are many empty shops.
- Use empty shops for community projects or change of use to affordable living spaces.

Helen Montgomery-Smith
Eel Pie Boatyard and for EPIA

Mark Montgomery-Smith
Eel Pie Boatyard and for EPIA

Attached Relevant EPIA Appendices

-  1. EPIA Statement for Finance Committee Meeting 20.pdf
-  2. EPIA follow-up letter meeting 01.04.20.pdf
-  3. EPIA Notes 20 May 2020 Mtg.pdf
-  4. EPIA Meeting Notes 02 Dec 20.pdf
-  5. EPIA Proposal Meeting 03/03/21 .docx
-  6. EPIA Meeting Notes 16032021.pdf
-  7. EPIA Meeting notes 11 May 21.pdf
-  8. EPIA comment at transport meeting 15th June 21
-  9. EPIA PMA Report for Transport and Air Quality 15.06.21.pdf
-  10. EPIA P2172 PMA Objection 21_2758_FUL 12102021.pdf
-  11. EPIA Planning Observation 19 feb 22.pdf
-  12. EPIA Stopping Up Order Aug 22.pdf
-  13. EPIA object points Planning committee Nov 22
-  13. Visuals for 13 EPIA .pdf
-  14. EPIA Stopping Up Order Feb 23.pdf
-  15. EPI CPO modif.pdf

eel pie boatyard ltd. eel pie island. twickenham. middlesex. tw1 3dy
 registered no: 3344832. england. registered office: eel pie island. twickenham
www.eelpieboatyard.co.uk
 directors: helen montgomery-smith. mark montgomery-smith