

Twickenham Riverside development: Submission from Twickenham Riverside ward councillors

Background

This submission is made on behalf of the three councillors for Twickenham Riverside ward, Julia Neden-Watts, James Chard and Stephen O'Shea, as well as a recent former councillor, Roger Crouch.¹

The future of the Twickenham Riverside site bordered by Water Lane, Wharf Lane, King Street and the River Thames has been a controversial one locally for more than 40 years since the closure of the public baths in 1980. The site is unique in the opportunity it presents for regeneration of Twickenham, because it has the potential to directly connect the town centre and river, making more of the river as a reason to visit the town. Residents are well aware of the site's potential and its past failure to achieve that potential. A fairly common lament on the doorsteps is that friends visiting from elsewhere are surprised to learn Twickenham is even on the River Thames. The potential of a unique site, and the contrast with the current situation, is a key reason why the future of Twickenham Riverside has long been a matter of heated public debate locally.

Without re-hashing the lengthy history, the Inquiry will be aware that there have been a series of proposals under Council administrations of various political hues to redevelop the site which, until the most recent plans were developed from 2018 with wide public support, have proved highly unpopular.

In our view as ward councillors, the problems earlier proposals ran into stemmed primarily from unwillingness on the part of successive Council administrations to invest in the site to reflect the regeneration benefits that could be achieved from a Council-owned site in the centre of Twickenham. The requirement imposed on past proposals not to entail a net cost to the Council led to woeful under-provision in previous plans of public space of benefit to the wider community, and a sense among the public of an opportunity repeatedly being missed. Such public space does not provide a direct income to the Council but is crucial to the wider community and economy as it would significantly enhance the attractiveness of the centre of Twickenham as a destination both for residents nearby and visitors from further afield. The issue has been compounded both by an unwillingness to address the dominance of traffic and parking on the site, and by a top-down approach which has resulted in design and usage choices that do not reflect the preferences of local people who know the site and the character of the area best.

In 2018, there was a change in Council administration. This was reflected in the [2018 local elections in Twickenham Riverside ward](#). The future of the Twickenham Riverside site was a prominent issue in the campaign in 2018 and a factor in the result. As incoming councillors, we made several pledges based on the feedback from residents we received around that time. In particular:

1. To ensure that a firm financial commitment was given by the Council to contribute significant funding to the Twickenham Riverside project, fully reflecting its wider capacity to regenerate Twickenham and achieve other social gain objectives. The Inquiry will doubtless have seen extensive Council budget papers confirming and re-confirming this welcome commitment, including approval of financial provision by the [Finance, Policy and Resources Committee on 19 January 2023](#). The Council has also sought external funding, receiving a [£600,000 grant from the Department for Levelling Up, Housing and Communities](#) to support affordable housing aspects of the scheme.

¹ Cllrs Neden-Watts and Chard have served continuously for the ward since May 2018. Cllr Crouch served from May 2018 until the May 2022 elections when he stood down and Cllr O'Shea was elected for the first time.

2. To work with the Royal Institute of British Architects (RIBA) to develop and run a [design competition](#) which involved the public and in which they could have confidence. It was important to us that the design brief should reflect widespread public support for enhancing pedestrian space (i.e. ending the dominance of parking on the site), providing flexible open space, and offering a range of uses including affordable homes. Whilst reflecting core requirements, we wanted to ensure the brief was sufficiently open to attract a variety of alternative options.
3. To advance a scheme to planning that was deliverable in practical terms, including in relation to flood management, the servicing needs of residents and businesses nearby, and the various detailed requirements of planning policy. In other words, we appreciated that the scheme needed to work as well as being appealing on paper.

In 2022, we were [re-elected with increased majorities](#). Whilst local elections are decided by a range of factors which are national as well as local in nature, the Twickenham Riverside site has been and remains a key local issue influencing election results. Our experience during the campaign was that residents overwhelmingly welcomed the Hopkins design and progress made towards redevelopment. Such negative comments as we received focussed primarily on a desire to move faster rather than to slow down or stop. Only small numbers favoured the status quo including on parking and arrangement of the current site, and others having a very different vision for the site. Of these, some had simply misunderstood the plans (e.g. having been misinformed to the effect that the plans involved a net reduction in public open space or a lack of affordable homes) and were receptive to information setting out the accurate position. By contrast, our main opponents locally (the Conservatives) adopted a well-publicised position against the proposed development, and this proved extremely unpopular both in our own and nearby wards.

We would note that permanent [pedestrianisation of nearby Church Street](#) in 2021, following a very popular trial period during the COVID pandemic, tended to further increase support for the Twickenham Riverside scheme. This measure has been enormously popular and provides a nearby exemplar of pedestrianisation that most residents are keen to see expanded and made into a powerful unique selling point for our town.

Below, we assess from our perspective as ward councillors the existing site, reflect on the process followed since 2018, and set out our views on the quality of the exchange land.

Existing Twickenham Riverside site including Diamond Jubilee Gardens

In 2014, our Conservative predecessors granted a 125 year lease over part of the site, referred to as the Diamond Jubilee Gardens, to the Twickenham Riverside Trust (the “Trust”). It is the statutory objection of the Trust to the CPO that forms a key part of the reason for the current Inquiry.

As ward councillors, we recognise positive aspects of the 2014 decision and appreciate the hard work of current and former trustees in relation to opening up space that had previously been closed to the public, including provision of a play area.

It should not be taken as a criticism of trustees, however, to say that the vast majority of residents consider that the existing configuration of the site has significant and fundamental drawbacks, and the 2014 decision has clearly not met key objectives our predecessors set for it at the time.

In particular, the site suffers from very poor accessibility, either via steep steps from the Embankment car park, or a gate on the service road behind Iceland supermarket. It feels, and is, physically disconnected from the two aspects of Twickenham it most needs to be connected to, namely the Thames and Church Street (a bustling pedestrianised street full of independent businesses that is a major draw for visitors to the area). Consequently, use on a day-to-day basis of the site is extremely light. Whilst special events can attract greater numbers, these are infrequent, barely meeting the requirement in the 2014 Management Agreement between the Trust and Council for six events per year. There was a hiatus with no events for well over a year during the COVID pandemic which, while understandable to a degree given the challenges that period presented, stands in stark contrast with other public spaces such as Church Street which made a merit of being a relatively safe, open-air site to host events in that difficult time outside periods of strict lockdown. The Trust has proved unable to attract more regular events to the site, such as the weekly farmers' market that prefers its current location at Holly Road, in a way that might increase footfall and generate income for the Trust (see further below).



Above: Accessibility is currently poor and lacking in appeal.



Above: The current site feels disconnected from the River Thames and the town centre.

After dark and in poor weather, the position becomes even more stark as the site lacks the natural surveillance provided by passers-by and residential, office and retail use. The area has unfortunately attracted a level of anti-social behaviour including an [arson incident](#) that the Trust has put forward as a reason for not meeting their Management Agreement obligation to provide a Christmas tree on the site in recent years. Fly tipping, vandalism and drug abuse (including NO2) have also been reported to us as ward councillors. Whilst measures such as CCTV and working with the Police to ensure

regular patrols can help alleviate these sorts of issues, the Inquiry will understand that sites with low footfall and little overlooking, particularly in close proximity to a town centre, are often problematic.

In relation to the objectives set for the site by our predecessors in 2014, we would draw the Inquiry's attention to the Trust's Lease which, although it runs for 125 years, was established from the start to include a substantial change in 2024 (on the tenth anniversary). This will involve the Trust taking over responsibility for most repair and maintenance obligations from next year, when the 2014 Management Agreement also falls away. One has to conclude from this that our predecessors, and the Trust itself, intended for the Trust to build up activities so as to achieve financial sustainability over that ten year period through a combination of donations, grants and attracting potentially income generating uses (e.g. markets and open air cinema or concert events).

Regrettably, the ambition for the Trust has not been fulfilled in this respect. [Charities Commission reports](#) submitted by the Trust confirm income has instead followed a steadily declining trajectory, reaching £420 in the last completed year reported. Whilst COVID-affected in the last couple of years, Trust income even before then was nowhere near sufficient to meet Lease obligations beyond 2024, let alone to pay for improvements in line with the Trust's purposes and help fund other worthwhile but non-income generating events.

The parlous financial position of the Trust is significant for two reasons. Firstly, it underlines the fact that fundamental problems with the current arrangement, including the disconnect of the site from the river and Church Street, makes income generation to fund charitable objectives extremely challenging for the Trust. Secondly, it makes the important point that the position absent the approval of the CPO is not the status quo. Instead, the Trust will take on significant repair and maintenance obligations it has proved itself to be poorly placed to fund. Our very real fear is that the site would consequently suffer further decline over coming years.

Finally, although the Trust was partly established to involve and engage the wider public in Twickenham, it has not been effective in doing so. It [changed its articles of association](#) soon after formation in June 2014 to limit membership to trustees rather than the wider public, and trustees who favour the proposed development have more recently felt compelled to resign. Consequently, there is real concern that the Trust (whilst capable and sincere individuals on a personal level) increasingly represent a narrow range of interests, which is self-perpetuating and inward-looking, closing itself to alternative perspectives.

Process leading to selection of Hopkins

As ward councillors, we were closely involved in the process leading to the selection of Hopkins. Cllr Chard was part of the Design Panel that ultimately made the decisions on shortlisting and selection, and all ward councillors have been involved in many meetings and public engagement exercises.

The RIBA design brief was developed with RIBA and local stakeholders. It was deliberately non-prescriptive to encourage a diversity of design submissions, but set key objectives for architects to focus on (broadly relating to design quality, flexible public space, pedestrian priority, linking the river and town, being an exciting destination, and contributing to affordable housing provision). More than 50 architects expressed an interest in the project and five outstanding practices were shortlisted (Hopkins, Allies & Morrison, Baynes & Mitchell, Cullinan Studio, and Haworth Tomkins).

We would encourage the Inquiry to take some time to look at the concept designs put forward by the five shortlisted architects.² It should be noted that each was of a high standard, and the open nature of the design brief allowed for significant variation between the five.

The Council's Statement of Case sets out the [results of the engagement process](#) held in September 2019 on the five concept designs, and of the separate [engagement process for children and young people](#). The reports show the wide and deep appeal of the Hopkins concept design. However, completing surveys is a minority pursuit (and opponents will doubtless point to the many people locally who have not formally commented during the process). So, as ward councillors, we would like to draw out our personal experience of the process in addition to the raw figures.

At least one Twickenham Riverside ward councillor was present throughout all sessions at York House where concept designs were exhibited (except the final session which coincided with a Full Council meeting) and we tried to personally engage with and listen to as many visitors as possible about their impressions of the concept designs. Cllr Neden-Watts also attended sessions at schools with children and young people.

We had not formed firm views on our own preferences and genuinely wanted to be informed by those we spoke to both in terms of selecting an architect and working to refine the selected design as it progressed to planning approval. We were struck by the diversity of visitors to the exhibition, which included many from outside our ward, particularly young families who were frustrated about the current status of the site and enthusiastic about efforts to improve it, as well as older people who recalled the number of past proposals that had come to nothing, but found the new approach refreshing. There was a broad welcome for removal of parking but were some comments on servicing for residents and businesses which were reflected on in later iterations of the design.

Of relevance to arguments being put forward by the Trust to the Inquiry, far from being negatively received, the relatively prominent Wharf Lane building in the Hopkins design was very positively viewed by attendees. Many people see the site as a destination point at the end of the towpath from Marble Hill and Richmond Bridge (which is popular with walkers and cyclists) and saw it as fitting for the main building to exist there rather than the north of the site, providing a destination, including somewhere to eat, drink and socialise even in relatively poor weather (although one comment was that public toilets would be welcomed, and these were added in later iterations).



Above: Images from Hopkins' original concept design presented to the public in 2019 show features including the prominent Wharf Lane building.

² [Architect 1 \(Hopkins\)](#), [Architect 2](#), [Architect 3](#), [Architect 4](#) and [Architect 5](#) (n.b. concept designs were anonymised for the purposes of the competition).

Also of particular relevance to the Inquiry and the quality of the exchange land, attendees recognised and welcomed the variety and flexibility of the new public open space, and had ideas about the sorts of events and activities that they would like to see there in future. These ideas were carefully considered and informed subsequent iterations of the Hopkins design. In terms of accessibility, parents with very young children and older people were particularly favourably disposed to the improvements in the concepts on display.

Overall, while each concept design had its merits and proponents, the engagement process provided a very clear steer on the approach residents preferred.

Subsequent process to planning approval

Inevitably, there were changes to the Hopkins design between the concept presented at competition and that submitted for planning approval. Some of these reflected external constraints. This included, significantly, obtaining the agreement of the Environment Agency, noting the requirement to provide flood storage resilient to predicted increases in flood levels relating to climate change. It also included work on transport aspects, including the safety and feasibility of a proposed junction from Water Lane, on a relatively steep slope, into the service road behind King Street.

However, as well as ensuring the scheme was deliverable, changes also incorporated improvements suggested by members of the public alongside their broad welcome for the Hopkins concept. Significantly, Hopkins refined the plans to improve servicing provision for Eel Pie Island residents and businesses, and to widen Water Lane to make it more inviting and safer for pedestrians. Additionally, the connection with the river was improved by providing for boat storage at the Wharf Lane end and moving the pontoon closer to the Victorian boathouse at the bottom of Wharf Lane whilst also making other access improvements in that location.³ Public toilets were also added to the plans.

Although the further refined plans still clearly reflected the original concept design by 2020, there was a further consultation process in January 2021. As with the 2019 engagement process, the Council's Statement of Case sets out the [results of the consultation](#) and [separate engagement with young people](#). Due to a renewed wave of the COVID pandemic in very early 2021, the public exhibitions at York House that were held in 2019 could not be repeated at that time, but conference calls were held with residents. Given the relative complexity of the consultation (with nine information boards) and extent of consultation fatigue (noting the history over more than 40 years referred to above) the response was good and confirmed public support for the Hopkins design.

Following the second consultation, plans were submitted and there was a lengthy [planning process](#) involving planning officers and Hopkins on detailed aspects of the proposals. This was a frustrating process for us as ward councillors as well as the public, as it delayed the progress of the scheme, and pushed it beyond the 2022 local elections when we clearly would have preferred to contest those elections with an approved scheme. However, we recognise the need for planning officers to provide robust challenge on all aspects of the submitted plans, including points where a level of expert knowledge is needed to assess fully (including biodiversity net gain, sustainability, and the inclusion of detailed and effective planning conditions). Ultimately, when it came to the [Planning Committee in November 2022](#), the officers' report and recommendation to approve was thorough, fair, clear, and unanimously agreed.

³ The grade II listed Victorian boathouse forms part of the neighbouring Thames Eyot, and a local charity (Habitats & Heritage) are seeking to restore it bring it into public use in future. Whilst this is not part of the planned Twickenham Riverside development, we have sought to facilitate that project as far as possible.

Quality of exchange land

In terms of the statutory grounds for approving the CPO, the quality of the exchange land is clearly paramount.

On one side of the equation we have, above, sought to give a realistic assessment of the current Diamond Jubilee Gardens. In our view, the exchange land that has been offered to the Trust is far superior to existing land for several reasons:

1. In area, it is very substantially larger than the existing footprint. As set out in the Council's Statement of Case, the new Trust management area is 3,811m² compared with 2,510m² under the current lease, and total designated open space is greater still at 4,387m². The increase for the Trust is 1,301m² or slightly more than 50%. Size is, of course, not everything. But it is very important in terms of public utility and the practicality of hosting a range of special events.
2. The accessibility of the site is vastly improved. In particular, as noted above access from the south and east is currently only possible via steep concrete steps from the Embankment. Whilst appreciating step-free access is currently possible via the entrance behind Iceland, the new site represents an enormous practical improvement allowing easy access from the riverside walk from the direction of Marble Hill and Richmond Bridge, and from Church Street.
3. Crucially, the new site extends to the river. We comment on the flood risk aspects below, but the detrimental impact of the disconnection between the river and the Gardens under current arrangements should not be understated. As we have set out above, the uniqueness of the site derives from its proximity to a particularly attractive stretch of the Thames at a narrow point close to Eel Pie Island, and to the centre of Twickenham. Whilst visible from the existing Gardens, the current disconnect is palpable and this reality is one that the vast majority of residents understand.
4. Individual features of the site are improved. The new play area is enlarged and improved compared with the existing one. Soft landscaping is significantly increased⁴ whilst still providing the hard landscaping necessary for holding special and regular events. Electricity supply is improved to remove the need for diesel generators. The pontoon and boat storage provide greater opportunities to access the river.
5. The uses of the buildings on the site support and sustain the open space. The mixed uses (with residential, retail and office use) provide footfall on the site as well as natural surveillance to address anti-social behaviour. Cafés, restaurants and small shops are not just some kind of necessary evil that provide income to fund other improvements on the site (although they do form part of an overall financial case). More importantly, they are attractive destinations which complement the existing offering of Church Street and the open space on the site, providing shelter in inclement weather and a place for parents and grandparents to enjoy while young people make use of the play area, river activities or special events.

⁴ We understand that the current site is built on a rubble base, making it extremely difficult to incorporate soft landscaping, and restricting the diversity of planting. Again, the proposals resolve this problem.

We understand that the Trust have concerns over the replacement land differing in shape from their existing site and not being flat in the way that the current one is. Clearly moving to a more accessible site (as always intended in the design brief) inevitably means departing from the current arrangement where the Trust's site is on a raised plinth reached by steps. However, being different is not by any means the same as being inferior, and we have set out the problems of the existing arrangements. The proposals set out in some detail the flexibility of the site to host a range of events including those currently hosted plus a range of new events.

In relation to flooding, the Trust has argued that some of the exchange land is "floodable". However, caution is required regarding use of the term "floodable" in this context, as we understand it is being used to describe any land subject to a greater than one in 1000 annual probability of flooding (and in any event the total area of designated open space subject to *less* than this flood risk increases under the proposed scheme). Whilst extremely rare flood events brought about by an exceptional confluence of tidal and weather conditions are relevant to positioning of buildings, such a contingency is of very limited relevance to utility of open space for events and day-to-day public use. What matters for use of the space is the more common tidal flooding associated with particularly high tides (known as "spring tides" although the nomenclature is unconnected with the season). As set out in maps included in the Council's statement of case, there can be some flooding on the Embankment close to the river (as there is now). However, this is predictable from tide tables and is limited in extent. Further, we understand the Trust does not currently hold events when particularly high tides are predicted for various reasons including the risk of access from the Embankment being inhibited.

Finally, we understand the Trust has concerns over use of the site by service vehicles from 7am to 10am, and by bicycles. In relation to service vehicles, the period of access is significantly more limited than for pedestrianised areas such as Church Street, and is appropriate for the servicing needs of the site and nearby areas including Eel Pie Island. Highly restricted, timed access does not materially diminish the quality of that part of the exchange land that is affected. In relation to bicycles, no doubt the increased accessibility to the site will enable cyclists to pull up at the site to park their bicycles and enjoy the location like anyone else (while those cyclists travelling through without stopping would naturally use Water Lane). Bicycles and pedestrians coexist along the length of the towpath from Twickenham to Richmond Bridge with limited problems of conflict (particularly as faster cyclists simply prefer to use Richmond Road). As such, the potential for cyclist/pedestrian conflict in the area is very limited.

Final comments on approving CPO

We have set out, as ward councillors, our reasons for concluding that the CPO should be approved. In so doing, based on all our experience speaking with fellow local people years, we believe we have the overwhelming (although as ever not unanimous) support of residents.

An appropriate and open process has been followed where the balance of opinion amongst local people has been listened to and reflected in drawing up the design brief, selecting the architect, and refining the design for planning approval. The result is that the open space (including the exchange land) is not only substantially larger but substantially better than the current space, and those improvements are very much complemented by the built environment.

We would finally comment on the realistic, practical position should the CPO not be approved. As noted above, the likely result is not merely the status quo (with the deficiencies we have set out) but decline, given the provisions of the existing Lease and lack of success by the Trust in generating

income to support its maintenance obligations. It seems highly improbable to us that there would be political will to pursue a future scheme in the foreseeable future, let alone the substantial financial commitment referred to above. Absent approval, the exciting potential for the unique site that is Twickenham Riverside, unfulfilled for more than 40 years, would inevitably remain unfulfilled.

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