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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

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; I.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.