

## **TWICKENHAM RIVERSIDE TRUST'S RESPONSE TO THE SCHEME**

This response addresses the Scheme's Future Open Space and elements contained therein, with reference where relevant to the Existing Open Space, on the development site.

1. Please note: the Trust contests the exclusion of the terraced/landscaped section of the existing Jubilee Gardens to be found in the Jubilee Gardens' eastern corner from the Authority's definition of Existing Designated Open Space from Maps A/B (both of which show Existing Designated Open Space). This is addressed more fully in the Trust's response to the Authority's s19(1)(a) and (aa) case. In this document below, that area of Jubilee Gardens that has not been shown on Maps A/B, is being considered as having been incorrectly excluded from the Existing Designated Open Space.
2. The Scheme should also, we would submit, be viewed against the background of the total absence of any joint architect/client site visits. The response to an FOI request put in by the Trust revealed that from March 2020 (when Hopkins was appointed) to June 2021 (when the Scheme had been finalised and all the material required for its submission to the LPA in August 2021 was accordingly being prepared) not one single representative of the Authority (i.e. the 'client') met its architects on site.
3. This total absence of client/architect site visits is quite literally unheard of, even on projects taking place outside of the UK but being designed by UK-based architects (such as Hopkins). Client/architect site visits would be taking place invariably once every quarter during the design process, perhaps more at certain key junctures. Or if unforeseen problems presented themselves, such as indeed happened in July 2020, when the Authority (somewhat belatedly, considering it had already made the Trust a "final offer" in June 2020) contacted the Environment Agency for what it thought was the first time regarding the Scheme. A substantial redesign followed.
4. And yet, even in spite of the Scheme's controversial redesign (introducing a 2.5m 'podium' on to Twickenham's Embankment) still not one single site visit took place.
5. This is, therefore, a Scheme that has been largely designed 'in absentia'.
6. This riverside site, however, is all about location, we would submit. Architecture at its best responds to its context, which is then layered with function. In spite of being offered the opportunity to view the site from the river, to approach from both upstream and downstream, neither the Authority or the architects, to our knowledge ever conducted such an exercise. As with the absence of client/architect site visits on land, this represents a

startling absence of rigour when it comes to fully assessing the context, impact and appropriateness of its Scheme.

1. Note: where an area of Future Designated Open Space is also Exchange Land, Retained Open Space or Lost Open Space, this will be indicated in the statement below. However, the Trust's response to the Authority's s19(1)(a) and (aa) case addresses more specifically matters of Lost Open Space, Exchange Land, Retained Open Space (as shown on Map F) as they pertain to Section 19(1)(a) and (1)(aa).
2. Please also note that here is, inevitably, an overlap between the content of this submission and the Trust's submission regarding the Authority's application for a certificate under s19(1)(a) and (aa). However, this submission offers more detail about the benefits/function of the Existing Open Space when compared to that being proposed. Both submissions are to be viewed side by side.

### **OPEN SPACE**

3. In its Statement of Case, the Authority has introduced the following terms/definitions to refer to Open Space:
4. *DESIGNATED OPEN SPACE: Existing Designated Open Space, Future Designated Open Space*  
*FUNCTIONING OPEN SPACE: Existing Functioning Open Space, Future Functioning Open Space*
5. However, of the several Maps produced by the Authority to accompany its Statement of Case, the most revealing with regard to considerations of Open Space - the Trust would suggest - are Map B (Existing Functioning Open Space, with the correction as noted above - and ringed in purple below - to the area of Existing Designated Open Space) and Map L (specifically, the red outlined area that is the Twickenham Riverside Trust Lease/License Area).



1. Map B and Map L show most clearly, in the Trust's opinion, the Existing Open Space v. the Future Open Space. They show Open Space as the public 'experience' it now and what it is proposed they would 'experience' in the future. Different shades of green on maps, definitions in glossaries, Trusts with leases or licences, highways with flowerbeds on top of them - all of this, again with the greatest of respect, is neither here nor there to the public, now and in the future, in terms of how they experience Open Space.

### **MAP L - AREAS OUTSIDE OF THE RED LINE**

2. Regarding Future Open Space, the red line of Map L excludes (rightly):
  3. the 'pay-to-play' terraces of the pub and the cafe
  - the Water Lane Building's eastern/southern elevation (Retail) Walkway
  - the Wharf Lane Building's western/southern elevation (Service/Access) Walkway
  - the Wharf Lane Building's northern elevation (Service Road) Forecourt
4. Additionally, the red line on Map L does not go hard up against the frontages of buildings, as the green shading on Maps showing the Future Designated Open Space does.
5. This location of the red line on Map L is a tacit acknowledgement on the part of the Authority that there is always circulation space or 'breathing' space around a building that is independent of any Open Space that might also be adjacent. The two are contiguous, and in the same location, but not of the same quality/function. They do not, in our opinion, meet the requirement of the s19(1) definition of Open Space i.e. land providing for public recreation and/or laid out as public gardens.
6. The Trust considers, therefore, for this and for other reasons outlined below, that the Areas 1-4 outlined above rightly lie outside of the red line June 2021 Reprovision offered to the Trust precisely because they do not represent Future Designated Open Space (or even Future Functioning Open Space).
7. This has been tacitly acknowledged by the Authority by the very fact that Areas 1-4 lie outside of the Trust's June 2021 Reprovision of Open Space i.e. outside of the red line as shown on Map L.
8. Additionally, as well as being promoted as Future Designated Open Space, Area (2) above is also being promoted as Exchange Land (see Map F of the Order Land). Significantly, Area (2) - the Water Lane (Retail) Walkway - does not form part of the June 2021 Reprovision of Open Space.



1. As mentioned, the Reprovision offer dates from June 2021. This pre-dates the Authority's realisation in September 2021 that it would not be able to rely exclusively on Section 19(1)(a), but would instead need to make a hybrid Section 19(1)(a) + (aa) case.
2. It was at this point (September 2021) that Area (2) - the Water Lane (Retail) Walkway - was 'required' as Exchange Land by the Authority in support of its section 19(1)(a) case, and was now identified as 'Open Space' on a revised Order Land map.

### **MAP L: FUTURE DESIGNATED OPEN SPACE + FUTURE FUNCTIONING OPEN SPACE = OPEN SPACE**

3. In para 6.22, the Statement of Case states that the Scheme would "deliver significant enhancements to existing open space."
4. Para 6.23 continues: "by area, the Scheme would provide an uplift in open space, public open space, soft and hard landscape and open space outside of a floodable area."
5. Para 6.24 states that the Scheme complies with para 99 of the NPFF "which states that existing open space should not be built on unless the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quality and quantity in a suitable location."
6. Para 6.25 states that the Scheme "would also represent an improvement to the existing open space."
7. The Planning Officer's Report, in the Planning Balance and Conclusion section (para 11.8) similarly highlighted the proposed public realm as being of "significant benefit." Para 11.15 emphasised that a "clear benefit" of the Scheme was the reconfiguration of the Embankment area: "The riverside is currently [...] dominated by the car park along the riverside, which severs the open space from the river and diminishes the quality of the public realm."
8. The provision/reprovision of open space is clearly a central aspect of this Scheme.
9. The sections below examine the various areas of Future Designated Open Space and Future Functioning Open Space, as shown on Map L.

## **FUTURE FUNCTIONING OPEN SPACE ON THE EMBANKMENT: REMOVAL OF PARKING (EXCEPT FOR SERVICING/DELIVERIES) FROM THE EMBANKMENT**

1. The Planning Officer's Report, in the section "issue v - Public Realm" para 8.129, stated that "The most significant improvement would be along the Embankment. The removal of the car parking to provide an attractive pedestrian priority area, linking the gardens to the river."
2. This is with reference to the removal of parking from that part of the Embankment within the development site. There would also be accordingly be a reduction in the vehicular movement associated with parking.
3. It must be emphasised that the Trust is supports of the removal of parked cars from the development site, whilst also acknowledging that there will be displacement 'ripple effects' in other areas of the Twickenham's riverside.
4. The Statement of Case likewise refers in para 6.25 the "enhancements" to the open space as detailed in the Planning Officer's Report, with para 6.25.2 mentioning "removing the existing severance caused by the car park and the access road on the Embankment."
5. Before looking in detail at this aspect of the Scheme, it should be placed within a wider riverside context. Whilst a 'car-free riverside' is being promoted as a benefit of the Scheme, car parking would nevertheless remain on the adjacent Embankment between Water Lane and Church Lane, with spaces being provided/rezoned as Residents Only on the Embankment and on the nearby Embankment Town Quay, in front of the Mary Wallace Theatre, with an additional parking bay being placed directly on the riverfront.
6. As further mitigation for the proposed removal of parking from the Embankment between Wharf Lane and Water Lane, the currently lightly used pay-and-display/residents parking spaces along a nearby road called Riverside, leading from Church Lane on Twickenham's Embankment towards Orleans House Gallery, would be made Residents' Only parking. Accordingly, a currently lightly 'parked' area of the Twickenham riverside that is alongside a little trafficked road currently much used by both pedestrians and cyclists (it is the primary riverside route in and out of Twickenham's riverside and joins up with the towpath between Twickenham and Richmond) would as a result be much more heavily/regularly occupied by vehicles and their associated movements. Parking and vehicular movement would therefore, in part, be displaced from one part of the Twickenham's riverside to another as a result of the Scheme.

1. However, putting all of the above to one side, it is acknowledged and accepted that the removal of parking from the development site is a primary influencer in those voicing support for the Scheme. And it must be restated that the Trust is likewise supportive.
1. The Authority's January 2021 Consultation demonstrated support (albeit with 'nudges', as detailed in the Trust's representation regarding Consultation/Negotiation) for the removal of parking from the Embankment. Para 3.10 of the Statement of Case: "respondents most commonly mentioned the car-free riverside."
2. A 2017 petition run by the Twickenham Riverside Park Team using #parknotcarpark was signed by c.3000 people. The headline of this 2017 petition called for "A Space for People, Not Cars. We'd like cars to be removed from Twickenham Riverside in order to create a beautiful Riverside Park and Town Square."
3. As a background note, this petition was launched in response to the previous Administration's 2017 planning application for a Water Lane/Embankment development. The 2017 scheme incorporated the existing Diamond Jubilee Gardens into the wider public space being created. The 2017 scheme also provided an accessible landscaped ramped access between the existing Gardens and the Embankment (in the area that is the existing Jubilee Gardens).
4. Down on the Embankment, the 2017 planning application retained the existing Embankment promenade (which had benefitted from a 21-week refurbishment project in 2013).
5. However, under the 2017 scheme, the existing car parking was mostly to remain in situ on the Embankment. Rather, a phased removal of car parking was envisaged, starting from a central area to both sides of the road (i.e. in front of the Diamond Jubilee Gardens with its new and centrally located ramped access) and then extending outwards in a phased removal.
6. The retention of car parking on the Embankment was, however, a key focus of public opposition to the 2017 scheme.
7. Local elections were held in May 2018 and the incoming Administration withdrew the planning application, which had been granted planning consent (subject to Environment Agency alterations) in March 2018.
8. In December 2022, the Leader of the Council Cllr Gareth Roberts gave a radio interview. Cllr Roberts was also Chair of the RIBA Design Panel (which chose the winning design), and is Chair of the Twickenham Riverside Sponsor Board (providing oversight on the project),

and Chair of the Finance, Policy and Resources Committee (which approved funding for the project).

1. After detailing other benefits of the Scheme (housing, retail units, regeneration of Twickenham), Cllr Roberts stated, with great emphasis on the word “real”, that the removal of parking from the Embankment was the primary benefit of the Scheme:
2. *“The real benefit of this site is that we are going to take away the parking from the river.”*
3. The removal of parking from this area of the Embankment was, and remains, the benefit/ wellbeing of the Scheme most heavily promoted by the Acquiring Authority, with photographs of Councillors against a backdrop of parked vehicles on the Embankment, for example, frequently featuring in public updates about the Scheme, or when seeking support for the proposals.
4. An analysis carried out by the Trust of comments received in support of the Planning Application also showed that the removal of parking/reduction in vehicular movement on the Embankment was by far the most frequently mentioned positive aspect of the Scheme.
5. And it cannot be stated clearly enough that the Trust most strongly agrees that the removal of car parking from the Embankment represents the most significant improvement to public realm of the proposed Scheme. This is a wellbeing that we support.
6. It is also an improvement to public realm that the Trust would also like to emphasise most strongly that can be delivered without any Compulsory Purchase of the Trust’s demise within the Diamond Jubilee Gardens. The removal of parking is a matter that entirely concerns the lower Embankment area and is entirely within the Authority’s gift without the need to exercise such draconian statutory powers.
7. Approval for parking proposals associated with the Twickenham Riverside Development, to include removal of the car parking from that part of the Embankment within the development site, was given at the November 2020 meeting of the Transport and Air Quality Committee. This was in the context of a wider review of the Zone D CPZ (which includes the Embankment) that created new parking spaces and reclassified existing ones.
8. It was agreed that “the parking proposals be implemented by way of experimental traffic orders involving further consultation with the community and reviewed after a period of six months.”

1. The report most specifically made the distinction between parking and access/servicing (this latter to be subject to a separate report to the Committee).
2. The Minutes of the November 2020 meeting state:
  1. “Officers said that a large amount of data had been collated. A full parking stress survey had been undertaken. [...] No decision had been made on permanent change. Schemes would be experimental and could be amended or removed should this be agreed by the Committee.”
2. The November 2020 Minutes further state:
3. “The changes would be implemented by experimental traffic orders and this would involve a consultation and any issues that arose could be amended during this period.”
4. The changes to parking in Zone D CPZ came back to the Transport and Air Quality Committee in June 2021, following a December 2020 review of town-centre car parks (with a lengthy list of recommendations from its consultant) and a simultaneous review of the parking stress across the whole of the CPZ.
5. The report notes:
6. “The parking proposals developed to date seek to address the displacement of the removal of 82 parking places around The Embankment area. The true impact of the removal of the spaces is not known at this time as the Council works towards a resolution in this matter. The finalised proposals will be implemented by way of Experimental Traffic Orders which will provide a period of operational experience [...] with an option to make early modifications if required.”
7. The feasibility of the removal of parking from the Embankment to the extent envisaged in the Scheme therefore still remains a significant ‘unknown’. Its removal is one of the principle benefits being promoted by the Authority, and the one that relates most closely to the provision of the public realm, with the Planning Officer’s report as citing the removal of parking on the Embankment to being of “significant benefit.”
8. It has been within the full power of the Acquiring Authority for at least two years to be able to demonstrate definitively at Public Inquiry that this key aspect of its Scheme can be successfully implemented.
9. At the Full Council meeting on 27 September 2022, the Leader of the Opposition Green Party, Cllr Richard Bennett, asked a question about timing around the removal of parking

from the Embankment, bearing in mind it had been almost two years since the decision had been taken.

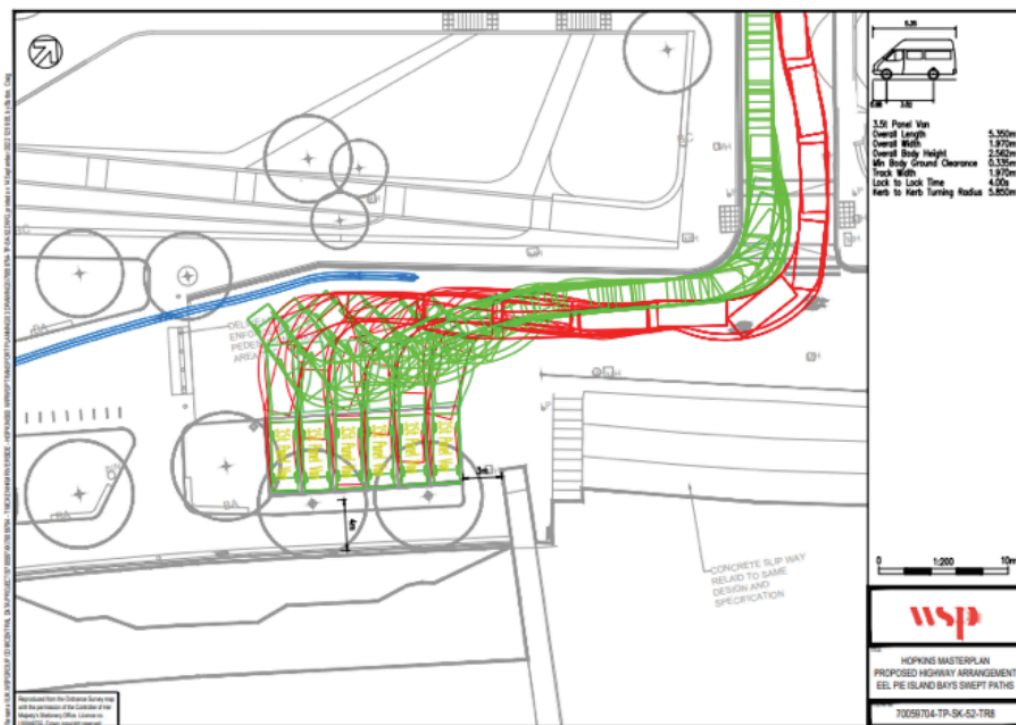
1. In the written response to Cllr Bennett's question, the Chair of the Transport Committee stated: "these parking spaces will remain active until such time that works in the area require them to be suspended."
2. The removal of parking from that part of the Embankment within the development site therefore continues to be 'held hostage' by the Acquiring Authority. It is relentlessly promoted as a "significant benefit" of the proposed Scheme (and by extension the CPO) that can seemingly only be delivered for the public through their continuing support of a large-scale development on Twickenham's riverside.
3. Additionally, the Acquiring Authority has made not any material efforts to demonstrate (via an ETO, for example) that the removal of car parking from the Embankment is even deliverable as detailed in its Scheme. Indeed, the Planning Application has already identified where extra parking spaces could be introduced along the eastern edge of Water Lane, should the need be identified. This could result in the eastern side of Water Lane being an almost continual stretch of parked vehicles - the Loading Bay, parking spaces and motorcycle parking - immediately opposite the purported 'open space' that constitutes the Water Lane Retail Walkway.

**VEHICULAR MOVEMENT ON THE SCHEME: IMPACT ON THE FUTURE DESIGNATED OPEN SPACE/EXCHANGE LAND OF THE WATER LANE PRIMARY PEDESTRIAN ROUTE/WALKWAY AND THE TWO LOWER LAWNS OF THE TERRACED LAWNS**

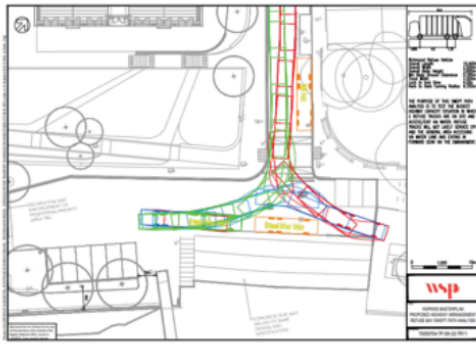
4. As noted above, the removal of most of the car parking from that part of the Embankment situated within the development site will directly result in a reduction in vehicular movement.
5. However, it should be noted that there will not be a reduction in vehicular movement on Water Lane relating to the existing servicing (deliveries etc) of King St, Church St, Water Lane, the wider Embankment area (extending eastwards towards Church Lane) and Eel Pie Island.
6. The Water Lane carriageway runs adjacent to and parallel with (for the most part) the Water Lane Primary Pedestrian Route/Walkway/Future Designated Open Space/Exchange Land.
7. Rather, this existing service-related vehicular movement along Water Lane will, as a consequence of the Scheme and Water Lane being made two way, be all but doubled.

Outside of the hours when the Embankment Road would be open (7:00-10:00am), all service vehicles entering the Embankment area via Water Lane would all need also to leave via Water Lane.

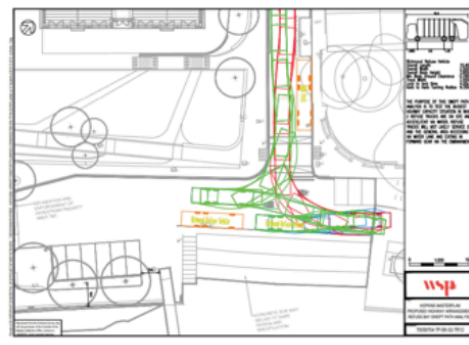
1. Moreover, there will be an increase in the service-related vehicular movement along Water Lane as there would be the additional vehicular movement resulting from the servicing of the retail/commercial units and the residential units of the Water Lane Building.
2. See below for the swept paths relating to the vehicular movement that would take place up and down Water Lane, on the Embankment Road in front of the slipway (where vehicles will need to execute turns in the road in order to turn around) and in the area in and above the Eel Pie Island service bays located on the Embankment next to the island's bridge.



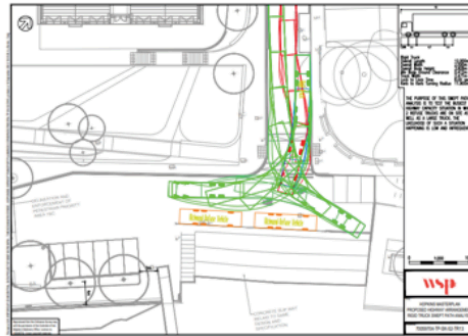
**Appendix D Revised Stage I Road Safety Audit Oct 2022 page 24 EEL PIE ISLAND DELIVERY/LOADING BAYS SWEEP PATH**



Appendix D Revised Stage I Road Safety Audit Oct 2022  
page 21 WATER LANE SWEEP PATH



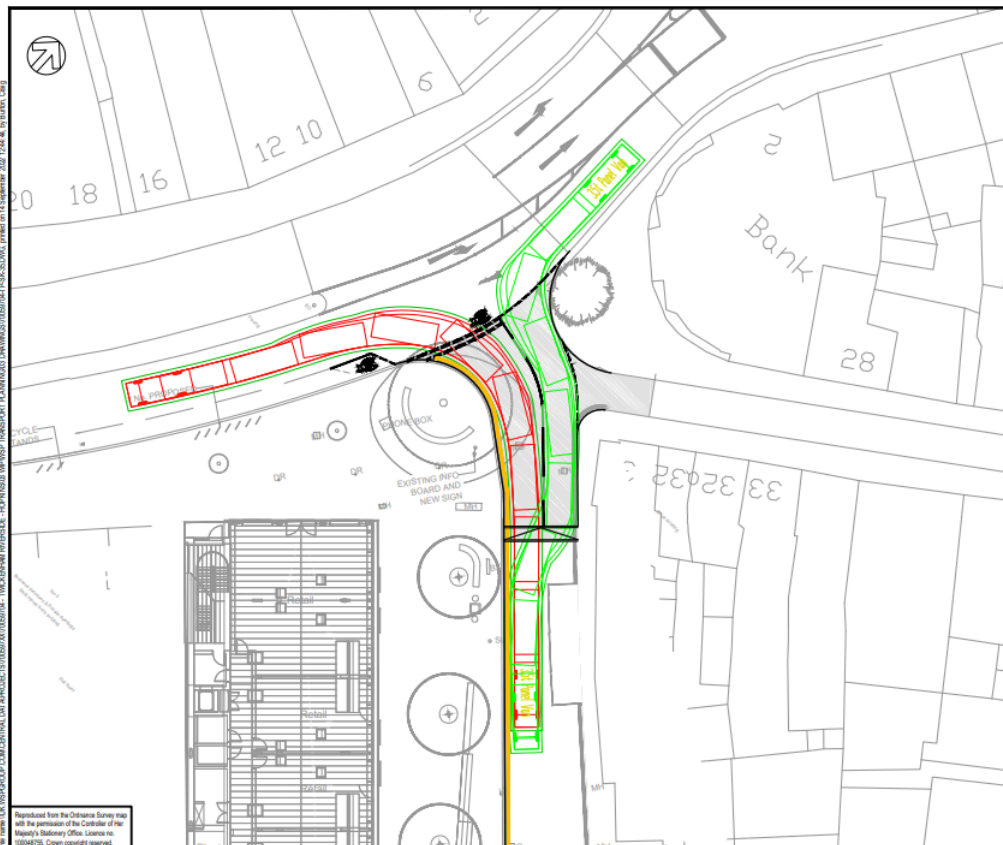
Appendix D Revised Stage I Road Safety Audit Oct 2022  
page 20 WATER LANE SWEEP PATH



Appendix D Revised Stage I  
Road Safety Audit Oct 2022  
page 19  
WATER LANE SWEEP PATH

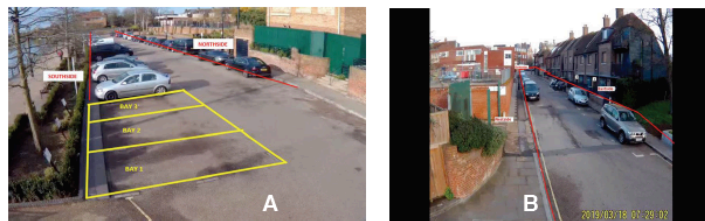
COPYRIGHT HOPKINS/WSP

27

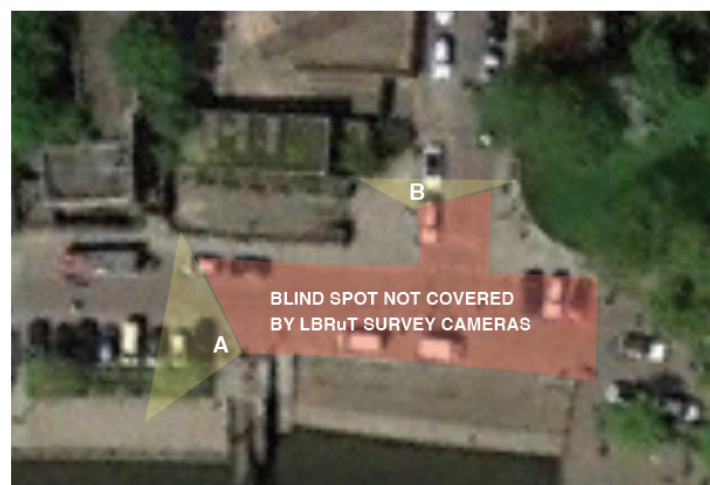




1. As is clearly demonstrated in the above swept path visuals, the vehicular movement outlined above is taking place directly adjacent to Future Designated Open Space/Exchange Land (i.e. the Water Lane Primary Pedestrian Route/Walkway and the two Lower Lawns of the Grassy Finger).
2. The two Lower Lawns/Exchange Land of the Grassy Finger overlook the six Eel Pie Island Service Bays. They also overlook the Water Lane/Embankment 'turns in the road' area. Any member of the public sitting on these Lower Lawns will be at the same level as the vehicular movement.
3. Additionally, the area of the Embankment directly adjacent to the Lower Lawns/Exchange Land is also to be used by service/delivery vehicles too large to be accommodated by the service bays.
4. When the Authority carried out its surveys of delivery movement in this area, its cameras were placed such that there were significant blindspots relating to the existing servicing taking place on the Embankment around the Eel Pie Island Bridge at both the bottom of Water Lane and the north side of the Embankment Road opposite the bridge.



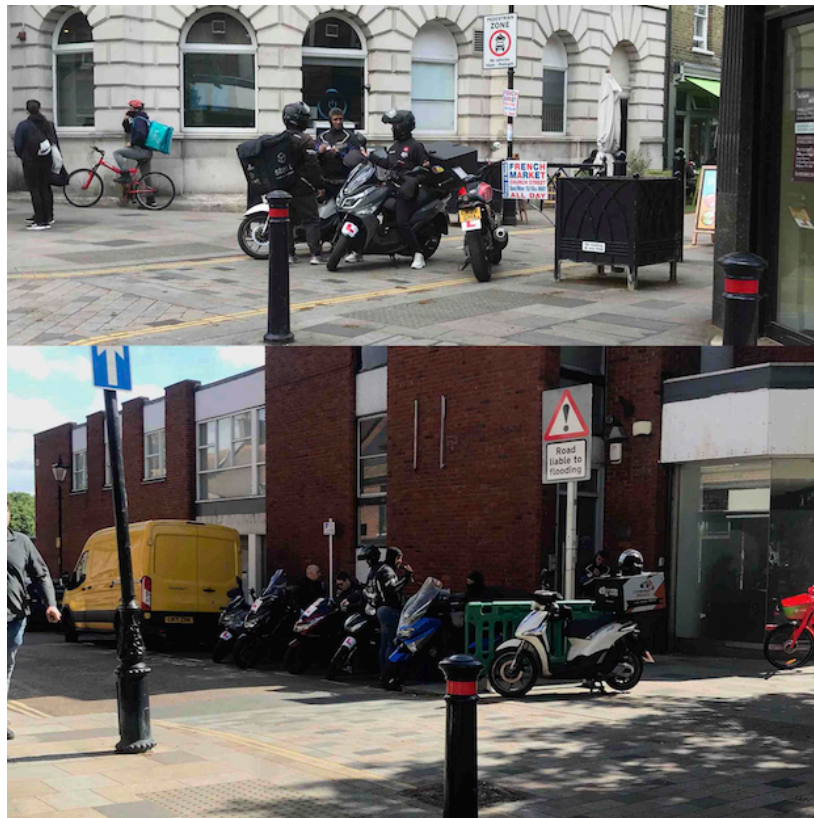
Survey camera (A and B) views supplied by LBRuT.  
Cameras were attached to lampposts.



**BLINDSPOT:**  
Major servicing area to Eel Pie Island  
(“yellow-line servicing”) **not** captured  
by LBRuT survey cameras

1. The Authority is suggesting that there are just nine delivery movements a day associated with Eel Pie Island. This is a considerable underestimation.
2. Additionally, after the Authority carried out its surveys, nearby Church St was pedestrianised 10am-midnight. As a result, a large loading bay was introduced at the top of Water Lane to allow day-long servicing of the retail/commercial units of Church St to continue. These Church St servicing vehicles would additionally be executing turns in the road to exit the Embankment area via the newly two-way Water Lane.
3. A further consequence of Church St being pedestrianised is that all vehicles entering the Embankment area (for example, residents accessing parking in the adjacent Embankment parking area) would as a result of the Scheme now also leave via Water Lane (10am-midnight, when the entrance from Bell Lane into Church St would be inaccessible)
4. Whilst the number of individual vehicles entering the Embankment area would undoubtedly be reduced under the Scheme because of the reduced Embankment parking, the impact of those vehicular movements that would remain would disproportionately impact Water Lane, which would be two-way.
5. The level of the two Lower Lawns/Exchange Land with respect to this vehicular movement has been discussed above. However, this vehicular movement also has an impact on the Future Designated Open Space/Exchange Land on Water Lane.
6. Towards the bottom of Water Lane, the Water Lane Retail Walkway/Future Designated Open Space/Exchange Land is situated on the c.2m (in relation to the carriageway-level pavement) raised podium of the Water Lane Building.
7. However, as one progresses up the sloped Water Lane, the Walkway/Future Designated Open Space/Exchange Land gradually becomes closer to running alongside the two-way carriageway.
8. At the point on Water Lane where the Loading/Service Bay would be located, the Walkway/Future Designated Open Space/Exchange Land is now at a level with the carriageway, with a relatively narrow pavement separating the two. When the Loading/Service Bay is in use (and observations of the existing Water Lane Loading Bay show that this is pretty constant throughout the day, and there is no reason why this will not only continue but most likely also increase under the Scheme), all vehicles would have to use that side of the carriageway nearest to the Future Designated Open Space/Exchange Land.

1. At the top of Water Lane, the two-way vehicular movement experienced from the Walkway/ Exchange Land will be joined by the c. 32,000 vehicular movements a day along King St.
2. The Water Lane/King St junction has also, over the past couple of years, become the main area in central Twickenham at which online delivery (Deliveroo, UberEats, JustEast etc) motorbikes/scooters congregate, some with their vehicles on King St, some on Water Lane (in the existing Loading Bay) and some in the gated-off carriageway in front of 10am-midnight closed-off Church St.
3. The Future Designated Open Space/Exchange Land will be directly adjacent to this takeaway-food delivery 'service area'. There is a KFC directly adjacent to the Scheme on King St which generates a considerable amount of vehicular movement, as well as the many (c.50 within 150m of the top of Water Lane) nearby central Twickenham food/beverage establishments offering takeaway food.
4. Accordingly - with delivery motorbikes/scooters arriving and leaving, two way-vehicular movement on Water Lane, the loading bay located just opposite, the vehicular movement on King St itself - whilst the proposed benches in this Future Designated Open Space/Exchange Land will undoubtedly be well used and much appreciated by the delivery drivers (as indeed the existing benches located on King St are), it is unlikely that a wider body of the public would chose to occupy for the purposes of public recreation benches in what is essentially a 'service area' with vehicular movement to two sides.



## **VEHICULAR MOVEMENT ON THE SCHEME: IMPACT ON THE PRIMARY PEDESTRIAN ROUTE/FUTURE DESIGNATED OPEN SPACE BEHIND THE WHARF LANE BUILDING**

1. Wharf Lane also introduces two-way vehicular movement that would introduce vehicles similarly executing turns in the road where the bottom of Wharf Lane meets the Embankment. It is, though, acknowledged and accepted that there will be a considerable reduction in vehicular movements on Wharf Lane.
2. The Future Designated Open Space on Wharf Lane, adjacent to the western elevation of the Wharf Lane Building will be addressed in a section below.
3. However, there is an area of Future Designated Open Space (not being proposed as Exchange Land but nevertheless being promoted as Future Designated Open Space) that is situated adjacent to the junction of Wharf Lane with the Service Road and is adversely impacted by vehicular movement in a way that the Existing Designated Open Space in this location is not.
4. Whilst direct comparisons are not relevant (as with Exchange Land considerations), a comparison of the Existing with the Future in this particular area nevertheless highlights how certain areas of Future Designated Open Space do not, in the Trust's opinion, merit being classified as such.
5. The area between the back of the Wharf Lane Building and the Service Road (the Wharf Lane Building Forecourt) is identified on the Acquiring Authority's Planning Application as a part of a Primary Pedestrian Route. See below from the Landscape Public Realm Strategy Part I October 2022 page 31 "Strategies: Pedestrian Movement - Proposed":



 **ACCESSIBLE ENTRY LIMITED TO OUTER EDGES OF THE DEVELOPMENT SITE**

**Landscape Public Realm Strategy Part I Oct 2022 page 31 PEDESTRIAN MOVEMENT**

1. It should be pointed out that the Wharf Lane Building Forecourt slopes down to meet the lower level of the Service Road as it runs parallel to the rear elevation of the Wharf Lane Building. This slope has not been shown on the digital visuals for this area.
2. The Wharf Lane Building Forecourt is predominantly devoid of any landscaped elements, being sandwiched tightly between the Service Road, the existing buildings to the north of the Service Road and the northern elevation of the Wharf Lane Building itself.

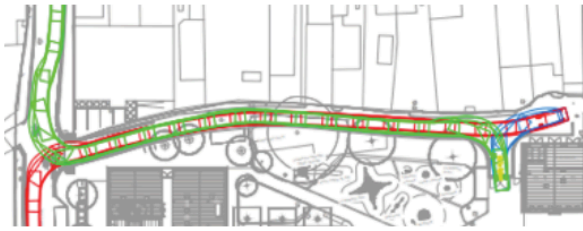




1. In contrast, the existing entrance to the Diamond Jubilee Gardens, visible from King St, is flanked on either side by two Indian bean trees, heralding the green and open aspect that lies beyond
2. The presence of these trees, in conjunction with other existing immediately visible 'greening' aspects, serve to mitigate against the busy rear service area of the Iceland store situated directly opposite on the other side of the Service Road.



1. The Iceland service area is frequently used as an outside storage area for significant amounts of recycling waste (in large metal carts, for daily collection by delivery vehicles, typically made during the morning though these carts accumulate during the working day, also). The large metal carts are to be found to both the rear and side of Iceland during its opening hours.
2. There are also three Iceland parking bays on the Service Road at its junction with Wharf Lane for the store's local delivery trucks. These vehicles make frequent trips throughout the day, delivering orders that can be placed online to be fulfilled at the local store as well as shopping purchased in person in the store which is then delivered to the customer.
3. The Future Designated Open Space (the Wharf Lane Building Forecourt) is entirely open to this waste storage/service area. The Existing Designated Open Space is not, being screened by planting/railings.
4. Also, unlike the Existing Designated Open Space in this area, the proposed Future Designated Open Space at the Wharf Lane/Service Road junction forms part of a 'shared surface' (both visual and actual) with the Service Road, with no delineation (apart from a level hard-landscaped visual 'kerb' element) between the two:



**Appendix D Revised Stage I Road Safety Audit Oct 2022  
page 3 (DETAIL) SERVICE ROAD SWEEP PATH**



**COPYRIGHT HOPKINS/WSP/LDA**



**29**

1. The existing brick rear brick wall to the Diamond Jubilee Gardens that faces the Service Road is frequently impacted by delivery vehicles, some of whom reverse down the Service Road, having executed a turn in the road, using the entrance off Wharf Lane to the King Street Parade's rear parking facilities.
2. There is a very strong possibility that vehicular movement in this area will 'leak' into this Future Designated Open Space on a regular basis, further degrading its proposed status as Future Designated Open Space and, more importantly, creating safety concerns for pedestrians.
3. The Trust made an Observation on the Planning Application about the Wharf Lane Building Forecourt, which has been supplied as a supporting document: *Wharf Lane and Service Road junction 21/2758/FUL*
4. This matter was also highlighted again in the Visuals Brochure that accompanied representations made by the Trust and other objectors at the November 2022 Planning Committee:
5. It should be noted that the Officer's Report makes no reference whatsoever to this area of the Acquiring Authority's Future Designated Open Space in its wide-ranging assessment of Public Realm (Issue v- Public Realm paras 8.123-8.138).



1. There is also a parking bay that forms part of the Wharf Lane Building Forecourt.
2. The Acquiring Authority has a Richmond Design Review Panel (RDRP). According to the Authority's website, the RDRP is an "independent body comprising of architects, urban designers, landscape architects, engineers, transport planners, heritage experts and other design related professionals with a local interest and recognised expertise in their field."
3. Its purpose is to assess "pre-application schemes within the borough, ideally at an early stage in the design and planning process [...] with a view to raising the architectural quality of proposals."
4. The RDRP produced two reports (6 May 2021 and 28 June 2021). Hopkins had been appointed in March 2020. The Planning Application was submitted to the LPA on 4 August 2021.
5. The RDRP's two reports can be found on pp95-107 of the Authority's Planning Statement.
6. The RDRP's reports are additionally referenced elsewhere in this document. However, the RDRP made the following comments about the Wharf Lane Building that, as detailed in the Planning Officer's Report, remain as "Outstanding recommendations/concerns" (para 8.141, Table 8):
7. *Recommendations:*  
*Moving the disabled bay on the service road to improve entrance and legibility to DJGs*
8. The June 2021 RDRP report described the entrance into Diamond Jubilee Gardens from the Wharf Lane Building Forecourt as (p.3) "an unwelcome pinch point". It continued: "We think this entrance should be clearer and designed in a more confident way [...]."
9. All issues raised, therefore, about the quality, amenity value, and safety of this area of Future Designated Open Space remain unaddressed in the Officer's Report assessment of public realm with an unresolved recommendation from the RDRP relating to this Primary Pedestrian Route.
10. The northern elevation of the Wharf Lane Building itself is also judged to be "inferior" by the Planning Officer's Report (para 8.99):
11. "The northern elevation 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 flat and

insignificant. The applicants claim balconies are not possible in response to the arrangement of the flats [...]. Regardless this is regrettable for a new build not to be designed and arranged internally to ensure all elevations are of the same quality.”

1. Any benefits to the public of this Future Designated Open Space are not explored in the Acquiring Authority’s Statement of Case. This latter limits itself to an assessment of that part of the Future Designated Open Space that forms the Exchange Land and yet also at the same time, in para 8.3, states the following:
2. “8.23 Whilst the areas of Exchange Land and Retained Open Space are each addressed in turn in this section, they must also be considered in the context of the Scheme’s objective to achieve a much larger and improved overall area of open space and public realm on the Modified Order Land as part of a comprehensive redevelopment [...]. Maps A-F illustrate what is to be achieved in terms of open space and wider public realm and how that compares to Existing Designated Open Space and the Existing Functioning Open Space.”
3. Map C (Future Designated Open Space) nevertheless includes the Wharf Lane Building Forecourt in the overall total of Future Designated Open Space being promoted by the CPO Scheme.
4. The Trust strongly contests the value of this area as Future Designated Public Open Space. As with the Water Lane (Retail) Walkway, it is not public realm but rather a ‘right of way’. Additionally, in this instance, this area is also very much a ‘back entrance’ leading to a “pinch point” with vehicular movement directly adjacent.

#### **WHARF LANE BUILDING (SERVICE) WALKWAY**

5. The pedestrian walkway alongside the western elevation of the Wharf Lane Building is also identified as Future Designated Open Space.
6. It is identified as a Tertiary Pedestrian Route in the Acquiring Authority’s Planning Application. See below from the Landscape Public Realm Strategy Part I October 2022 page 31 “Strategies: Pedestrian Movement - Proposed”:



 ACCESSIBLE ENTRY LIMITED TO OUTER EDGES OF THE DEVELOPMENT SITE

**Landscape Public Realm Strategy Part I Oct 2022 page 31 PEDESTRIAN MOVEMENT**

1. The Trust would agree that this Walkway is more accurately defined as a “Pedestrian Route” rather than an area of Future Designated Open Space. It is, in essence, no more than a ‘side service passage’, giving access to the service/functional entrances of the Wharf Lane Building - the refuse store, the entrance to the pub kitchens, the two residential hallways.
2. It is not, for example, an area in which the public would pause to take in a view, or sit on a wall. It is very much a transitional space, a way of getting from A to B, with little of any amenity value along the way.
3. This is acknowledged in the landscape design by the complete absence (not just along this Walkway but in any location in Wharf Lane) of benches or seating walls. Tree planting serves to in part separate the Walkway from Wharf Lane’s Loading Bay, two Service Bays and the stand-alone Refuse Storage Unit. However, in the Trust’s view, this is not sufficient amenity value such that it merits being called Open Space.

1. See below for visuals from the Response to DRP and PreApp Design Matters LR October 2022 (pages 16 and 18):



**COPYRIGHT HOPKINS**

Response to DRP and PreApp Design Matters LR Oct 2022 page 18



**COPYRIGHT HOPKINS**

Response to DRP and PreApp Design Matters LR page 16

**16**

- I. See below for the architect's visual of the western elevation of the Wharf Lane Building (Response to DRP and PreApp Design Matters LR Oct 2022 page 16):

NOTE: purple annotations made by the Trust

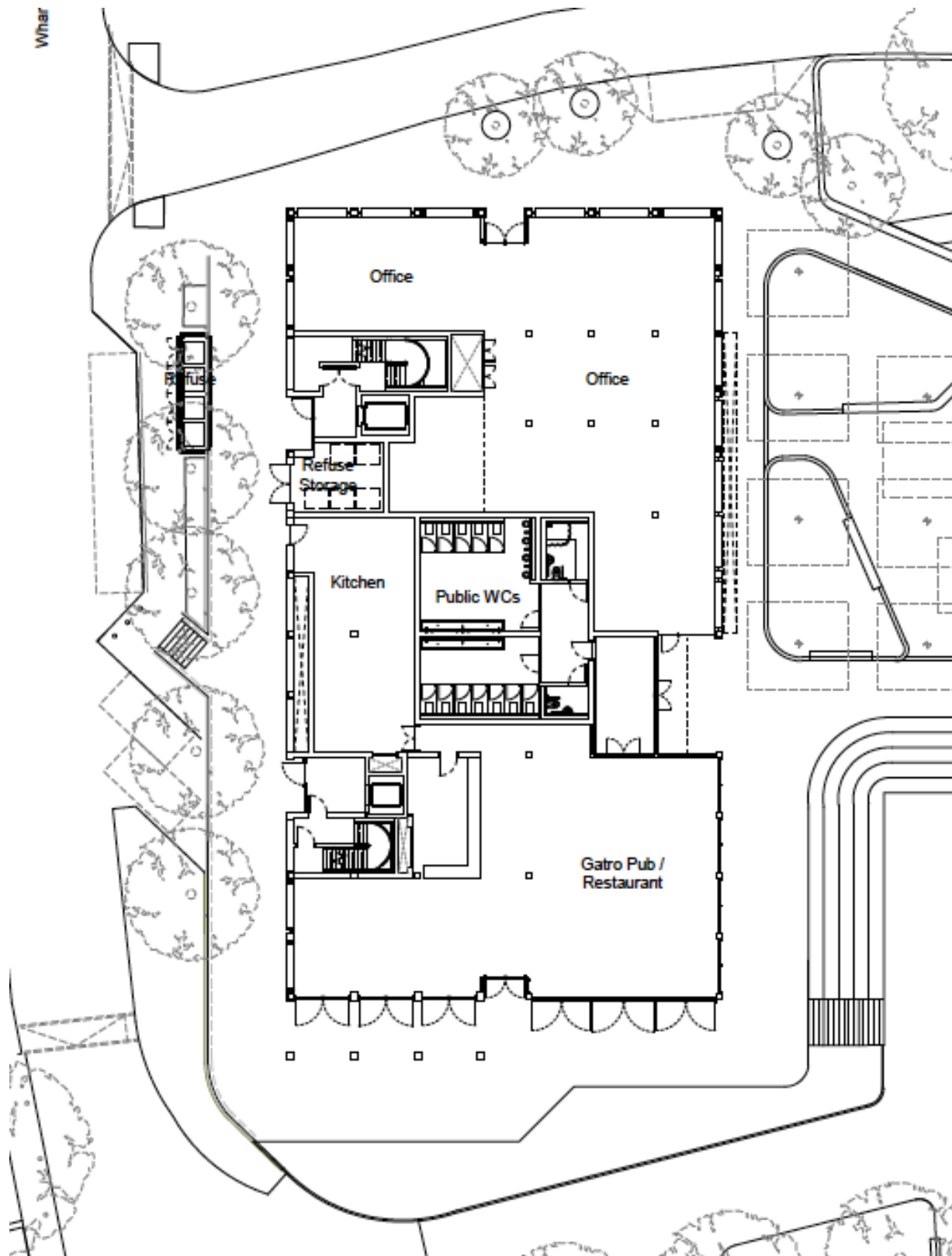


**COPYRIGHT HOPKINS**

Response to DRP and PreApp Design Matters LR Oct 2022 page 16

2. Further, see below for Wharf Lane Building Proposed Ground Floor Plan (Authority Core Document 3.35):





1. As can be seen from the Ground Floor Plan above, the 'entrance' from the Service Road into this Tertiary Pedestrian Route/Future Designated Open Space running alongside the western elevation of the Wharf Lane Building is also flanked to either side by two Refuse Storage facilities and on one side a Loading Bay.

1. Putting aside loading bays and refuse storage areas, the remainder of ground level of the western elevation of the Wharf Lane Building is a predominantly blank facade.
2. Para 8.98 of the Officer's Planning Report: "The western elevation is considered to be acceptable [...]. The ground floor has a lack of activity, with only four of the 13 'bays' being clear glazed. However, the reasoning is accepted, with the need to provide residential entrance, servicing for refuse, kitchen and stair core. Further the residential entrances will provide a degree of animation. This also enables the active frontages on the remaining elevations."
3. In an attempt to disguise this identified 'lack of activity', the Authority has included chairs and tables its visual of this elevation of the Wharf Lane Building to be found on page 26 of the Landscape and Public Realm Strategy (October 2022). See image below:



COPYRIGHT HOPKINS

Landscape and Public Realm Strategy Oct 2022 page 26

14

4. It should be noted that the location of these tables/chairs has not been indicated as an outdoor seating area on any plan put forward by the Acquiring Authority as part of its Planning Application. They would appear to only exist as a computer-generated image.
5. Whether or not a digital fiction, the amenity value of these tables and chairs (presumably for the use of kitchen staff, occupiers of the offices and residents of the Wharf Lane Building i.e. not the public in general?) is distinctly questionable, situated as they are between the two refuse areas that service the Wharf Lane Building.

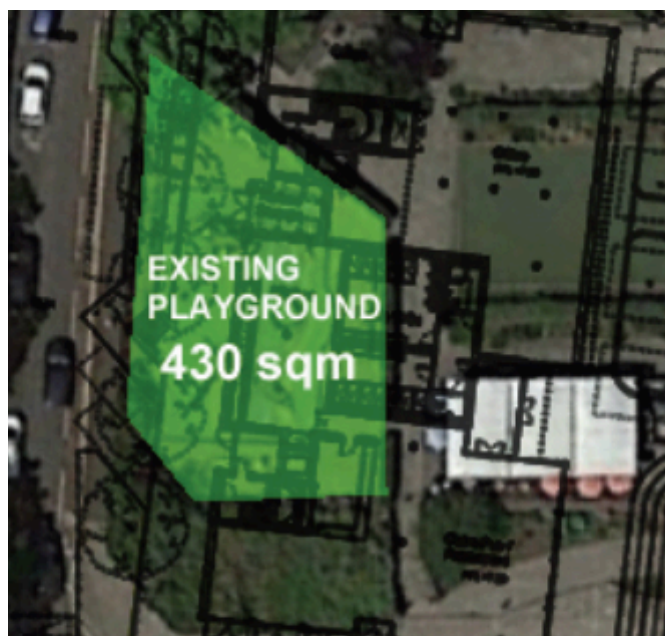
1. The quality of the newly introduced built elements (Wharf Lane Building rear elevation, Wharf Lane Building western elevation at ground level) in both the Forecourt and Walkway areas is, according to the Planning Officer's Report, suboptimal. This further devalues the adjoining areas as Future Designated Open Space.
2. Returning to the RDP's reports, page 4 of the June 2021 report reiterates the Panel's May 2021 reservations about the Wharf Lane Building's western elevation at ground-floor level. On page 2 of the May 2021 report, the panel has felt "there [was] an opportunity to improve the active frontage to the street" [TRT emphasis]. In June 2021, the panel is still requesting changes (moving kitchen/introducing concession) in order to create "a better pedestrian experience."
3. The above use of the word "street" only serves to confirm that the Wharf Lane Building (Service) Walkway is precisely that - a 'street', and moreover one with very little visual interest (blank facades) or amenity value. It does not therefore merit being defined as Designated Open Space, or even Open Space. It is a rear walkway. A side passage. It serves a function, certainly, but not that of a public garden or an area for public recreation.

#### **VARIOUS ELEMENTS PROPOSED WITHIN THE AUTHORITY'S SCHEME**

4. Having in the above sections set out the Trust's case that those areas lying outside the red line of Map L should not be considered Designated Open Space (or even Open Space), the following sections below will address those elements of the Scheme that are to be found within Map L's red line.
5. This is the area on Map L that represents, in the Trust's opinion, the true 'open space' (as experienced by the public) that is being provided by the Scheme.
6. **PETANQUE** - The Authority identifies the 'Petanque Area' as the playing pitches only. However, the existing 'Petanque Area' extends beyond the pitches themselves. It includes circulation space (used by players/observers) around and between the pitches, and the four benches that overlook the pitches (used to accommodate bags etc and for resting between games, or observing others play).
7. In comparative m2 terms, therefore, the existing 'Petanque Area' is more accurately represented by saying it occupies c.200m2 (in comparison to the 286m2 being proposed).
8. However, to make the comparison between the Existing and the Proposed based solely on m2 would be to ignore both the location and the aspect of the Existing and the Proposed.



1. In summer, both the Existing and the Proposed benefit from shade provided by the plane trees.
2. However, outside of the summer months, and when there are no leaves on the trees (the plane trees are also pruned back very hard each year), the Existing pitches benefit from the year round sunshine on sunny days outside of the summertime. This both extends and enhances their year-round amenity value.
3. In contrast, the proposed petanque pitches will be sitting beneath the shadow of the Wharf Lane Building for much of the year. This will have a pronounced negative impact in those months when sunshine materially enhances the amenity value of a space.
4. The health and wellbeing benefits of sunshine - sunstroke aside - are accepted as fact, and do not therefore, we would respectfully suggest, need to be laid out here.
5. It is to be regretted, therefore, that the Authority is minimising the 'value' of the existing provision by defining amenity value (in this instance, expressed in m<sup>2</sup>) by 'surface' rather than 'usage' or 'quality'.
6. This kind of misrepresentation/misunderstanding/failure to appreciate how an area is actually used by the public and a fuller appreciation of how it sits in its location are the direct results of the complete absence of Architect/Client site visits during the entire design period (March 2020-June 2021).
7. **PLAYGROUND** - as per Petanque Area, this is another instance of the Authority failing to acknowledge that the function/usage of a space by the Public is not defined by a discrete area of surface material.
8. The Trust made two very detailed Objections regarding this as part of the planning process. Both of these Objections are to be found in the Trust's core documents:  
*21/2758/FUL Twickenham Riverside Trust (play area) (Jan 2022)*  
*21/2758/FUL Additional comments Twickenham Riverside Trust (play area) (Nov 2022)*
9. We would ask the Inspector to consider these detailed submissions alongside what is written below, as the Trust considers the area of the Scheme's playspace to constitute c.24% (or 133.1m<sup>2</sup>) less than the Authority is required to provide.
10. See below for GoogleEarth view of the existing enclosed playground area (with Hopkins Scheme overlaid - this latter not being relevant per se):



1. See below for the Authority's definition of the 'play area' (i.e the spongy surface within the wider enclosed playground). This measures just 187m<sup>2</sup>, and it is this much reduced number that forms the base number used by the Authority to calculate what it needs to reprovide under its Scheme:



2. See below for just a couple of photographs of the existing playground in use. The Authority is making no claims whatsoever (and rightly so) that this playground is not well used, and, given its sunny aspect, well used year round:



1. By way of further evidence, the timelapse footage supplied in support of the Trust's response to the Authority's Statement of Case, whilst not showing the playground itself, nevertheless shows a constant stream of users entering and exiting the playground using the one gate (of the two) that is visible in the footage.
2. It is therefore an uncontested matter of fact that the existing playground is a busy, much used space. It is a valuable community asset. With the residential occupancy of town centres such as Twickenham only set to increase, and with the majority of this accommodation, by virtue

of its location, in flats located in relatively tight, urban spaces, the provision of outdoor play space, not only for the benefit of child residents but also for their parents/carers (some of the most important friendships between parents, especially those parents with employment commitments, are forged in the playgrounds or other open spaces their charges regularly frequent) is of paramount importance.

1. For the Authority to be making (in the Trust's opinion) materially misleading representations about the size of the existing playground (defining the playground's area as being only the blue/green spongy surface that can be seen in the photos above rather than the wider area) in order to reduce its requirement, as the 'developer' of this site, to not only reprovide the existing but also to provide extra space in order to accommodate the development's uplift, is nothing short of scandalous. This simply cannot be overstated.
2. Moreover, the Authority has a duty to 'forward plan'. Indeed, its emerging Local Plan does so regarding housing, for example. Where, though, is the Authority's 'forward planning' regarding playspace (and other outdoor amenity spaces) for the future occupants of these town-centre developments/conversions? Such playspace as exists will be under increased pressure to accommodate even more residents. As more offices are converted to residences (with such conversions by their very nature invariably unable to provide outdoor amenity space), the use of local outdoor spaces will increase.
3. The Authority, through its ownership of this significant town-centre area of open space, has a unique opportunity to provide a true riverside park, a large area of functioning outdoor amenity space in a unique riverside location, not only for existing residents, but for those to come.
4. This is the kind of the "destination" the Authority has the opportunity to create, and in doing so reflect more fully the aspirations of the TAAP. A frequently mentioned driving force behind this development is to create a "destination", to increase footfall to Twickenham and in doing so play a part in its "regeneration."
5. Instead, the Scheme has an Open Space layout, which includes the 'Play Area', about which the Richmond Design Review Panel (in May 2021) expressed "concern about all the functions being crammed [Trust emphasis] into that part of the site which does not flood, and the flooded area just paved over."
6. Instead of looking to extend and enhance existing provision, the Authority is using what can only be termed 'sleight of hand' as it 'fudges the numbers' to ensure it minimises its very basic requirement to reprovide playspace. This action represents what can only be termed a

dereliction of public duty, and sets disturbing planning precedent for future developments in the borough.

1. We would like to state once more that the Trust made two very detailed Objections regarding this as part of the planning process. Both of these Objections are to be found in the Trust's core documents: *21/2758/FUL Twickenham Riverside Trust (play area) (Jan 2022)* and *21/2758/FUL Additional comments Twickenham Riverside Trust (play area) (Nov 2022)*.
2. There was no response whatsoever on this point in the Planning Officer's report. It was quite simply ignored. The Authority's response (March 2023) was not much longer, simply stating that the re-provision was compliant in planning terms.
3. The Trust asked the Authority to provide a Glossary definition of 'play area' or 'play space' as used in its Statement of Case. At the time of writing, however, no definition has been forthcoming.
4. As mentioned above, the Authority has chosen to define a 'playground' solely by a surface to be found within, and not by the area that forms the totality of the playground, even one that is enclosed. This 'definition' will be even more concerning if further endorsed through the successful use of powers of Compulsory Purchase.
5. **SEATING PROVISION** - The Trust would ask it to be noted that, as per its representation to via the Planning process (supplied as a core document: *21/2758/FUL seating inaccuracies*), the existing seating provision has been considerably underestimated by the Authority due to (1) not all existing benches having been included and (2) more significantly, none of the existing low-walled seating areas available to the public in various locations in the development site have been included, even though comparable seating areas in the Scheme are.
6. See below for photographs of walled seating being used in Diamond Jubilee Gardens:





1. See below for use being made of the Jubilee Gardens Embankment-level walled seating:



## EVENTS SPACE

1. It is a matter of fact that there is existing provision for events hosted on Diamond Jubilee Gardens and down on the Embankment, to include both on the existing Embankment Road (with this latter subject to temporary road closures/parking suspensions in order to facilitate this e.g. TryCycle, Christmas Train, Twickenham Alive events) as well as the Embankment Promenade.
2. See below for a montage of event posters for events 2016-2019:



3. Both 2020 and 2021 were quiet years in terms of events, with event activity for the most part (with the exception of the High Tide Festival in September 2021 and the Christmas Dog Show in December 2021) having been suspended, following full consultation with the Council.
4. 2022 saw a return to events being hosted on the Gardens:







1. See below for a montage of events that will have taken place on the Gardens in 2023 by 1st July 2023:



2. The Big Screen returns for the first two weeks of June, showing Wimbledon, children's movies at the weekend, and family movies on some evenings (see below for photos from 2022):



- I. Also, on 30th July, the High Tide Festival will return to the Gardens for the third time. The Gardens host the festival's main Jazz Stage as well as concession stands on and around the petanque pitches:



2. There are also a series of Heritage Walks (celebrating Arcadian Thames) accompanied by a pop-up exhibition in the Gardens, taking place every Sunday during September 2023, as part of both the borough's annual "Know Your Place" festival and also the Londonwide "Totally Thames" festival. Children's events for Hallowe'en and Christmas will take place as per previous years.
3. As the variety of events shown above demonstrate, many events take place within the existing Diamond Jubilee Gardens, making use of its multi-functional space, which consists of adjoining areas that have - and this is most important - amenity value outside of their intermittent function to host events.
4. The Scheme's "Events Space" is, in contrast, singularly referred to as such in the Authority's Statement of Case. Apart from markets, no day-to-day or even regular activity of any sort is outlined. This is in contrast to the existing Open Space used to host events, which has a function/amenity value to its users 365 days of the year.
5. This is a crucial oversight. The Authority provides no details as to the proposed amenity for public recreation that the Embankment level space would provide for the majority of the



days of the year.

1. In contrast, the area most commonly referred to by the Authority as the 'Event Space' within the Diamond Jubilee Gardens (when in fact the entirety of the Gardens is 'event space') is used year round for ball games, scootering, bike riding, chalk games etc):



2. The Trust made two very detailed representations regarding the proposed "Event Space" as part of the Planning Process. These form part of the Trust's core documents:

*21/2758/FUL Event Space, artificial grass (March 2022)*

*21/2758/FUL Event Spaces and Embankment Square (Nov 2022)*

3. The above Objections also contain a selection of event layout plans that show how the Diamond Jubilee Garden's open space in its entirety is used to host events. The Gardens can be seen as a series of outdoor 'rooms' which both interact and yet can be used for discrete purposes when hosting an event. They are contiguous and on a level, allowing participants to move freely and easily between the various areas. May 14th 2023, for example will see the King Charles III Coronation Dog Show, in which there will not only be the show ring (and associated infrastructure of fencing and gazebos) but also a facepainting tent and a tent selling Turkish food to raise funds for a Richmond-based EAL charity. All of this will be happening in different areas but adjacent to one another, on a level, with participants moving freely between the spaces within a wider enclosed area.

1. The Trust had long voiced its concerns to the Project Team regarding the suitability of this Embankment area not only for events (as its use seems to be exclusively promoted) but also as a general amenity space, this latter degraded on a daily basis by the fact that it is bisected by a cycle path.
2. The Council's most recent response (at a meeting between the Trust and the Council on 3.3.2023) where the Trust yet again raised its concerns was that there were many areas in the borough where cyclists and pedestrians 'cohabit'.
3. Whilst it is true that pedestrians and cyclists occupy the same space on many of the borough's towpaths, for example, both parties are travelling in a linear fashion. In the proposed Events Space, pedestrians are potentially entering into cyclists' direction of travel from any and all angles.
4. Irrespective of the challenge this presents when hosting an event in terms of managing or limiting this activity, it also severely limits any aspect of free play, for example, for children in this area. No change of surface is detailed between the Cycle Route/Highway and the Events Space it bisects.
5. And, even if it were, this would not mitigate against the unaware (be they of any age) straying into the path of cyclists. This is an example of 'conflict' having been designed into the Scheme.
6. The cycle route through the Events Space is a continuation of the much used cycle route that (if travelled east to west) could be said to start at Richmond Bridge, continuing along the towpath to arrive on the outskirts of Twickenham at Orleans House Gardens, where cyclists transfer on to a road called Riverside when then becomes the Embankment road. The proposed Events Space has the Embankment road to both the east and the west of it, and whilst there will be bollarded access to either side, it is nevertheless highly unlikely that cyclists will dismount as they continue through to go up Wharf Lane to rejoin the road system.
7. When an event is taking place, managing bicycle movement - and any vehicular movement within the currently envisaged 7:00-10:00am time slot when vehicular access would be permitted along the Embankment Road - would obviously be part of an Event Management Plan. This in itself will present management issues not currently experienced in the operation of the events hosted in the existing Gardens.

1. However, it is the day-to-day usage of this Events Space by the public - traversing it to arrive at the river, for example, or children possibly using it for free play as outlined above - where conflict between user groups can and will arise.
2. This will degrade the value of the open space in this area, be it that part of the Events Space that is envisaged as Future Functioning Open Space (i.e. the highway) or that part of the Events Space directly adjacent to it i.e. the Future Designated Open Space, a section of which is being offered as Exchange Land.

### **PROXIMITY OF LARGE AREAS OF PROPOSED OPEN SPACE TO THE RIVER THAMES**

3. The Events Space is also located in Flood Zone Risk 1. It is of limited suitability in the present day, but also has every probability of being less so going into the future. It is not futureproof and therefore not of equal value to the public as that which already exists in Diamond Jubilee Gardens.
4. Matters relating to flooding are explored elsewhere in other Trust material, and obviously apply here, too.

### **PROXIMITY OF A PUBLIC HOUSE TO PROPOSED OPEN SPACE**

5. This has also been raised in other Trust material. The adjacent open space will obviously be of benefit to patrons of the pub, and no doubt to other members of the public wishing to drink next to the river. They are members of the public, too, and shouldn't be denied their opportunities for recreation.
6. However, their needs are already being met by a large riverside pub that is already on Twickenham's Embankment and a few minutes' away at the White Swan on Riverside.
7. The presence of a public house directly adjacent to open space will undoubtedly have an impact on the open space. The challenges faced by Richmond Riverside more than attest to this. This area has been subject to Dispersal Notices, for example.
8. The only two Cumulative Impact Zones in the borough are in central Richmond and Twickenham. They are in place for a reason, and have recently been reconfirmed. The introduction of a riverside pub next to public open space - with a children's playground in it - will without a doubt have a negative impact on certain members of the public's ability to enjoy the space.

### **ENVIRONMENTAL IMPACT**

9. The environmental impact of the Scheme is explored elsewhere in other Trust submissions.

1. At the April 2023 meeting of the Authority's Finance, Policy and Resources Committee, Cllr Richard Bennett, Leader of the Opposition (Green Party) addressed the committee on the subject of Twickenham riverside:
2. *"[...] If the Compulsory Purchase is not confirmed, if this doesn't go through [...] we begin to think about a Plan B. [...] **We end up with something that is green, probably greener, and certainly doesn't need to have the same level of building.**" [Trust emphasis]*

## CONCLUSION

3. In the Trust's opinion, the Open Space, the space that is being reprovided on the Scheme does not represent the same amenity value to the public as that which is currently available.
4. Additionally, the removal of the car parking on the Embankment presents an opportunity to extend and enhance the open space that is already available and in doing so create a true "destination" that will both bring visitors to the town and promote their wellbeing, now and into the future.
5. Extending the open space already created and enhanced over the past 15 years on Twickenham's riverside, and in doing so the creating a genuine riverside park, is goal that would win the support of many. There will no doubt always be the need to maintain some form of vehicular access along the Embankment. Similarly, this riverside site at Embankment level will always be subject to the unpredictable Thames, and vulnerable to climate change and other river-related factors (the implementation of large scale infrastructure projects such as the River Thames Scheme, for example, or the decommissioning of the Thames Barrier).
6. Which is precisely why the protection and extension and enhancement of open space that is currently not compromised as detailed above should be a priority for the Authority, not just for existing residents and visitors, but looking to the future also.