



Trustee Representations to LBRuT Planning Committee 24th November 2022

TED CREMIN – TRUST CHAIR

Just eight years ago, right here, this Council granted the Diamond Jubilee Gardens to the public on a 125-year lease. Now, this Council want to bulldoze it, destroying 23 established trees, to erect a 5 storey, 21-metre-tall Wharf Lane building just 10m from the river's edge.

The Townscape character assessment states that the Embankment has a semi-rural, riverine character with open views of verdant treescape and **LOW** buildings. The view up towards Wharf Lane is identified as requiring **PROTECTION THROUGH THE PLANNING PROCESS** (Page 5, 6).

The Richmond Local Plan states that the Council will **PROTECT THE QUALITY OF THIS VIEW** and **RESIST** development which interrupts, disrupts, or detracts from it.

- Yet that is precisely what the indefensible Wharf Lane building in this proposal would do.

For a sense of the scale, just look at pages 5 through 18. Is **THIS** the legacy each of you as a committee member wants to leave?

- A five-storey apartment block to blight our Riverside, indefinitely.

I am also alarmed by the almost complete absence of safety audits. Pages 22 to 29 demonstrate the dangerous conflict between pedestrians, cyclists, and vehicles that has not been addressed.

- It has instead been kicked down the road.

Now what does 'getting it right' look like?

- The derelict land on Water Lane is owned by the Council. It can and should be regenerated. This does **NOT** require the wasteful destruction of the existing gardens.
- Remove or reduce the parking if you wish. You have had approval to do so for the past 2 years. It does **NOT** require you to approve this plan.
- Addressing dereliction and removing parking must **NOT** be used as an excuse to build a 21m white elephant on our Riverside.

Now is the time to pivot to a lower cost, lower impact, more sustainable plan that privileges public open space over buildings.

Last week a petition was launched to save the gardens from the Wharf Lane building. In just 7 days, over 2,500 people have signed, **9 TIMES MORE** than supported the Council's plans on the portal over the past 12 months.

Leader Roberts claims the Lib Dem election victory last May is a mandate for this scheme. In the 12-page local manifesto I could find 10 words about the scheme. There was rather more to be said on tree protection, protecting green spaces, improving air quality and carbon reduction: all pledges that would be **SEVERLY COMPROMISED** if this scheme goes ahead.

- Is that what you want to achieve as a newly elected administration?
- Getting it **DONE** is not a reason to get it **WRONG**.

JANINE FOTIADIS-NEGREPONTIS

This scheme purports to meet the minimum environmental standards needed under planning law;

ONE, that the scheme will be Air Quality Neutral.

TWO, that it achieves a ten per cent net gain in biodiversity.

Both are required but neither will be realised.

With no Environmental Impact Assessment to highlight the scheme's shortcomings; a requirement for new developments significantly greater in scale than the previous use and for sensitive sites, the planning application is a master lesson in Greenwashing pushed by a council who declares itself a trailblazer of the green agenda.

There are at least 23 good reasons to reject this scheme tonight, that's the number of mature trees to be axed from the Diamond Jubilee public Gardens. Irreplaceable community assets and habitats destroyed, in direct contravention to this borough's own tree policy. The extensive canopy of these 23 natural lungs work hard to combat pollution arising from the

32,000 vehicular movements along King Street, daily. Smaller trees with far less filtration capacity are no substitute.

This application desperately seeks to conclude that the scheme has neutral impact on our local environment and public health, but no amount of greenwashing can hide the truth.

The introduction of two-way traffic along Water Lane will harm residents, existing and new. Pollutant concentrates at the site are expected to exceed the 1-hour and annual objectives, compounded by the blanket removal of 66 large trees and introducing the brutish Wharf Lane Building there's nothing neutral about this scheme.

Two years ago, this council voted to remove waterfront parking on the embankment – but to the detriment of this community's health and well-being, and to the detriment of our local environment, it did not act. Poor air quality was retained on the riverside in a cynical ploy to mitigate against the serious culminative harm that this scheme will cause.

I'll end by telling you about the onsite biodiversity net gains. There aren't any. Our Riverside will be so heavily constrained by overdevelopment that the green gains associated with the scheme can only ever exist on paper within this council's own greenwashed reports.

These proposals are destructive and harmful NOT neutral; will trigger the Urban Heat Island Effect on our riverside, reduce air quality, cause unacceptable levels of dust, damage our community and nature, spew light and cause noise pollution.

This scheme goes against National, London-wide and local policies and makes a mockery of this council's green agenda and declared climate emergency.

For these reasons it should be rejected.

MARK BROWNRIGG

The application to build the Wharf Lane building on Diamond Jubilee Gardens is both damaging to the Riverside and in conflict with the Twickenham Area Action Plan (TAAP).

The Council is failing to continue the deliberate policy and line of action evolved across different administrations since the mid-2000s. It's acting in contravention of decisions to preserve and protect the Gardens taken just 8 years ago, in 2014.

The first decisions to create the Gardens began a clear sequence of intention to establish and preserve a specific area of public space there, long-term.

2005 – Limited landscaped space created.

2009 – Council discharges the affordable housing requirement for the site, building elsewhere in the borough under a 'linked site' strategy.

2011-2012 – Council plans to preserve open space on the old pool site “in perpetuity”. It encourages the formation of the Riverside Trust.

The space is expanded and renamed 'Diamond Jubilee Gardens'.

2013 – The TAAP is adopted, stating the explicit intention: “to open up and redevelop ... the remaining area of the former pool site which adjoins the recently refurbished Jubilee Gardens” and that future development of the wider site would “**enhance and extend** Diamond Jubilee Gardens”.

Maps 7.12 and 7.14, in your folder at pages 29A and following, show the areas of Site TW7 earmarked for development. The TAAP keeps the Gardens **untouched**.

2014 – Council approves designation of the Gardens as 'Public Open Space' and notes this has “policy implications” for the TAAP. It grants the Trust a 125-year lease, requiring Trust **and** Council “to maintain the property as “Public Open Space” long-term.

2015 – Council acquires properties on King Street.

2017 – It enters the full TW7 site on the Brownfield Land Register as 'previously developed land' available for residential development. Great reliance was placed on this designation in the August 2021 planning statement.

The Trust has contested that entry since January, with change resisted by Council. Now, at one week's notice, the report says Council has redefined the TW7 'brownfield' land to **exclude** the Gardens.

The National Planning Policy Framework requires 'substantial weight [be given] to the value of using suitable brownfield land' for building new homes and stresses 'opportunities to remediate ... degraded and derelict ... land'.

Why did Council place so much emphasis on the 'brownfield' status of the Gardens and now reverse its decision, arguing that isn't important? The implications of that change deserve scrutiny.

To close, the Wharf Lane building element of this application should be **rejected** because it fails to comply with the TAAP and with the longterm Council policy confirmed in 2014, also enshrined in the legal instrument of the lease.

CELIA HOLMAN

The officer's report tonight is so heavily conditioned that one has to wonder what approval actually constitutes.

Some 16 months in planning to only get this far?

Many things are clearly still not right.

pages 42-45: The children's playground, shoved at the back, sandwiched between large buildings, with more large buildings expected to the rear of King St, next to a service road etc. Non-compliant in planning terms. Some disingenuous (to be polite) measuring equating

play SURFACE with play AREA. Opportunities for free play significantly reduced any playing whatsoever with balls entirely gone.

pages 44-47 Open space provision, not just for 'events' space, but also in terms of its overall flexibility of usage and amenity. This development represents a reduction in quality. And let's add in the negative year-round impact of shadowing from the 5- storey Wharf Lane Building, for example. Something this report barely acknowledges.

page 49 - Accessibility. Relegated to the very outer edges, with considerable conflict between pedestrians and cyclists designed in. Vehicular movement - the introduction of reversing and turns in the road. Yet more conflict. Where are the safety audits?

And then pages 51-53 - open space - a detailed before and after comparison. But it's the numbers on page 54 that cut through all the colour coding. Net gain of open space 1400m²: 70% hard landscaped, 70% floodable. ALL of this uplift created by the removal of Embankment Road and parking. And without the conditioned Stage 2 Safety Audits, the road stays.

And then where is the uplift? Soft landscaping - replace existing artificial grass with grass and the uplift in terms of soft landscaping from this development is 200m². That's just 15%. No wonder there's a floating ecosystem.

There are some huge developments coming down the pipeline - Mortlake brewery, Kew retail park, Homebase in East Sheen. And let's not forget the rear of King St. All delivering considerable amounts of housing.

So what you actually looking to achieve, as elected representatives, with this development?

To remove the parking? - that's an easy fix.

Remove or repurpose the unused buildings that represent just 10% of this development site? Again, not a huge task.

Where is the 'destination' value in this development? "Come to Twickenham riverside because...?"

Many, many people already come to Twickenham riverside, by the way. From all over the borough and beyond.

And where is the 'cultural' value? What a missed opportunity to showcase Twickenham's musical and riparian heritage.

And finally the 'regeneration' value? Look at what the simple pedestrianisation of Church Street is already achieving.

I urge you to reject this overdevelopment, one that fails to respect and enhance its heritage riverside location for the benefit of residents and visitors, now and decades and decades into the future.