

LBR11

**THE LONDON BOROUGH OF RICHMOND UPON THAMES**

**TOWN AND COUNTRY PLANNING ACT 1990 – SECTIONS 226(1)(a) AND  
226(3)(b)**

**LOCAL GOVERNMENT (MISCELLANEOUS PROVISIONS) ACT 1976  
ACQUISITION OF LAND ACT 1981**

**THE LONDON BOROUGH OF RICHMOND UPON THAMES (TWICKENHAM  
RIVERSIDE) COMPULSORY PURCHASE ORDER 2021**

**AND**

**APPLICATION FOR A CERTIFICATE PURSUANT TO SECTION 19 ACQUISITION  
AND SCHEDULE 3 OF LAND ACT 1981**

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**REBUTTAL PROOF OF EVIDENCE ON BEHALF OF THE  
ACQUIRING AUTHORITY**

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**IN RESPONSE TO EVIDENCE SUBMITTED BY:**

**NS-017: PAUL VELLUET**

1. **INTRODUCTION**

- 1.1 This is further proof of evidence (“rebuttal”) by witnesses for the Acquiring Authority in response to the statement prepared by Paul Velluet (**NS-017**).
- 1.2 This is not intended to be an exhaustive rebuttal of the contentions made in Mr Velluet’s evidence. This document only deals with certain points where it is considered appropriate and helpful to respond in writing. Where specific points have not been dealt with, this does not mean that those points are accepted and that they may be dealt with further at the inquiry.
- 1.3 This rebuttal addresses points raised by Mr Velluet by theme and is broken into sections, with witnesses addressing points relevant to their area of expertise.
- 1.4 The same references and abbreviations as used in the main Proofs of Evidence are used in this document.

2. **DESIGN AND OPEN SPACE (Chris Bannister)**

- 2.1 This section is being addressed by Chris Bannister. Details of Ms Bannister’s qualifications and experience are set out in his main Proof of Evidence (**LBR – 2A**).

**Quality of the proposed Designated Open Space**

- 2.2 In his statement, on page 2, Mr Velluet states that in his opinion the future designated public open space is not equal or greater in amenity value than the existing designated public open space.
- 2.3 This is dealt with in the Statement of Case (Section 8), and in further detail in Section 10 of Mr Bannister’s Proof of Evidence. (**LBR – 2A**).

**The approved Scheme fails to deliver the laudable, regenerative objectives of the original RIBA Competition Brief of March 2019.**

- 2.4 In response to this point, mentioned on page 2 of Mr Velluet’s statement, recognition that the regenerative objectives of the competition brief are laudable is welcomed, however it is unclear as to the basis on which it is stated that they are not delivered. The proposals will improve the visibility and accessibility of the Riverside area, provide new uses linked to the open space that will bring life and vitality back to this part of Twickenham. This is also addressed in general terms Mr Bannister’s Proof of Evidence (**LBR - 2A**). The benefits of the Scheme are also detailed in Section 9 of Mr Chadwick’s Proof of Evidence (**LBR – 1A**).

3. **TRANSPORT AND HIGHWAYS (Nick O'Donnell)**

- 3.1 This section is being addressed by Nick O'Donnell. Details of Mr O'Donnell's qualifications and experience are set out in his main Proof of Evidence (**LBR – 3A**).
- 3.2 Mr Velluet appends his letter to Mr Chadwick of 27<sup>th</sup> February 2023 regarding his objection to the proposed Stopping Up Order (SUO). In response to this, Mr Velluet refers to a letter that he sent to Mr Paul Chadwick dated 21 February 2023, but he has not attached copy of this letter with his response. However, Council Officers have obtained a copy of the letter he refers to, which is from Mr Doug Orchard in his capacity of Chair of the Twickenham Society.
- 3.3 In the letter Mr Velluet refers to, Mr Orchard stated that he objected to the draft SUO which the Council published notice of its intention to make in the Richmond and Twickenham Times on 2 February 2023. This notice is described in paragraph 6.7.4 of Mr O'Donnell's Proof of Evidence (**LBR – 3A**). Mr Orchard objected to the draft SUO because of the lack of a Road Safety Audit of the road layout on Water Lane, The Embankment, and Wharf Lane. The Council's response on this issue is covered in Section 8.4 of Mr O'Donnell's Proof of Evidence. A Stage 1 Road Safety Audit was submitted as an Appendix to both the initial and updated versions of the Transport Assessment that was part of the planning application that was granted permission. Paragraph 8.4.2 of Mr O'Donnell's Proof of Evidence also states that a planning condition has been secured whereby a Stage 2 Road Safety Audit of the new highway layout must be approved by the Local Planning Authority before development commences.
- 3.4 Mr Orchard also stated that he objected to the draft SUO because an Experimental Traffic Order containing the proposed changes to vehicular parking and movement along Water Lane, Wharf Lane, and The Embankment should have been completed in advance of the planning application going before the planning committee so the likely impact on existing road users could be assessed. The plan to make the Experimental Traffic Order was approved with the intention to partly or fully mitigate the removal of the parking spaces on The Embankment as part of an approved scheme. Due to this and to allow the parking spaces to be used until removal at the required stage of the project construction, it was considered appropriate not to remove them at an earlier date. In addition, applying this approach will allow for the statutory Experimental Traffic Order process to be executed when the spaces are removed and the mitigating measures are in place. Representations invited as part of the process will be considered as appropriate.