

Twickenham Riverside Trust comment on SUP-50 – Twickenham Riverside development: Submission from Twickenham Riverside ward councillors

General

1 The Trust is sad to find that many of the comments in this submission show a lack of understanding of the complexities of the Riverside site and the history leading to the present situation. Some of the authors have shown themselves to be driven more by the political ambitions of the present Council administration (which has an overwhelming dominance of power) than objective assessment of the challenges of developing this sensitive site and of the balance of views among Twickenham residents.

2 Like the overall approach of the Council, their involvement – as the ward representatives of local residents and half of the trustees – has not been to encourage dialogue on core issues but has tended to dismiss, in Minority Report style, the ability of the Trust to fulfil its objects into the future. Much of the language merely (if understandably) parrots the advantages which are set out in the Council's promotional and planning documents. In the process, facts have been tailored to support the Council's overall argument – with important practicalities and alternatives left unconsidered.

3 The Trust's view is reinforced by the fact that it faced at one point an aggressive campaign and misleading messaging, both in direct correspondence and through social media, by some of these same councillors pressurising the Trust, and challenging its ability and the integrity of individual trustees.

4 To take but three examples, these included pressing the Trust (in knowledge of its modest resources, as stressed in the submission) to take on unnecessary costs of employing external professional intermediaries in the negotiations, the launching of a social-media survey on the Trust's organisation of events on the Gardens during the Covid lockdown, and a call for the trustees (including those newly appointed, who

had only served under the threat of the CPO) to make way for others “who genuinely want to seize the opportunity and work for Twickenham”.

The site

5 The submission by the ward councillors refers to the “series of proposals under Council administrations of various political hues to redevelop the site which, until the most recent plans were developed from 2018 with wide public support, have proved highly unpopular” and to an “unwillingness on the part of successive Council administrations to invest in the site to reflect the regeneration benefits that could be achieved from a Council-owned site in the centre of Twickenham”.

6 This misunderstands completely the work that was done by the Council – yes, under successive administrations – and the vision that was shown for over a decade up until the mid-2010s with the deliberate aim of biting off the challenge in incremental steps. This saw significant investment in the redevelopment of the Riverside site in a very practical way including the creation of the Diamond Jubilee Gardens, improvements to other parts of the Riverside, and the adoption of the current Local Plan. All of this was encapsulated in the 2013 Twickenham Area Action Plan (the TAAP), which set a clear site-specific plan of action for the future. Indeed, the decision-takers who adopted the TAAP did so in order to preserve the much valued public open space on the Riverside. They did so also in the expectation and intention that continued enhancement and extension of the Riverside Park (ie the Gardens) would create the ‘destination’ and encourage the town centre ‘regeneration’ that both the present Scheme and the councillors wish to see – without building on the existing open space which was leased to the Trust. This is explained fully in S-2 W3.1 Twickenham Riverside Trust – Planning Policy Evidence.

7 Thus, contrary to the Council’s narrative, the new initiative in 2018 did not start from 40 years of decline and neglect, but offered the opportunity to take the next step in this prescient vision. This important historical background is ignored by the Councillors, who – oversimplifying – look back only to the decision in 2014 to grant the long lease on the bulk of the Diamond Jubilee Gardens to the Trust.

Councillors' starting point

8 The Trust notes the councillors' pledges as recorded and the report of their experience of the consultations in 2020 and 2021. The Trust shared many of their positive reactions following the design competition. While no doubt well-intentioned, the councillors' description of the consultations is both misleading and ignores the flaws in both consultations – (1) the omissions in the RIBA brief (no identification of the EA requirements and the huge changes that these necessitated to the initial concept design) and (2) the structural weaknesses which undermined the value of the subsequent consultation. They also disregard the large number of considered objections to the planning application which outnumbered the supporting responses by a significant margin (many of which argued merely for the Council to 'just get it done'). Fuller explanations are given in the Trust's input S-2 W4.1.1 TRT – Consultation and Engagement – Statement of Evidence.

9 They also dismiss the 3000 signatures on the petition launched by the Trust in September 2022 calling for a halt to the plan for the Wharf Lane building on the western side of the site.

10 Their comments imply that the trustees have little or no contact with Twickenham residents – “there is real concern that the Trust (whilst capable and sincere individuals on a personal level) increasingly represent a narrow range of interests, which is self-perpetuating and inward-looking, closing itself to alternative perspectives”. This subjective and critical assessment ignores completely the contacts that trustees have frequently with fellow residents and especially those with the very large numbers which attend events on the Gardens over the year. Significant, very practical feedback is received by trustees from these – as just one example, on the excellence of the present Gardens for the events held there, compared to the unsuitability of the Embankment for hosting events for small children given the openness and close proximity of the river's edge; of course, this can be dealt with but not without incurring huge additional costs and effort and unsightliness through the hire of Arris fencing and other facilities to guarantee safety.

11 The Trust welcomed the commitment of the Council to finance and take the project to the next level. Indeed, as stated elsewhere including in para 47 of S-2 W3.1 Twickenham Riverside Trust – Planning Policy Evidence, the Trust supports the Scheme proposals for the eastern side of the site (removing the derelict buildings and developing the ‘Santander block’ and the disused carpark) and the removal of the car parking from the Embankment. However that does not need to extend to the construction of the Wharf Lane building on the western side, which was expressly excluded by the TAAP.

12 The councillors also disregard the potential consequences of the error made by the Council in not correcting its entry of the Gardens without qualification on the Brownfield Land Register – until this was revoked in the Scheme planning report in November 2022.

13 Finally, the suggestion that the two local elections in 2018 and 2022 gave a direct mandate to the current administration to press ahead with its own vision for Twickenham Riverside without consideration either of the letter of the Local Plan or engagement with the Trust on the core issues is questionable, if not just wrong. The critical contributing factor in both was residents’ reaction to the Conservative Government and the failures of Brexit. While the Riverside was an important local factor, particularly in 2018, this centred essentially on calls for the removal of the parking from the Embankment and the desire to develop the areas of dereliction and disuse – all of which are already in the Council’s control, even if not yet actioned.

The Diamond Jubilee Gardens

14 The councillors again fall back on to the Council’s standard narrative in their assessment of the value and disadvantages of the Gardens – including: “very poor accessibility”, “physically disconnected from the two aspects of Twickenham it most needs to be connected to, namely the Thames and Church Street”, “use on a day-to-day basis of the site is extremely light”, “lacks the natural surveillance provided by passers-by and residential, office and retail use”, “anti-social behaviour”. The first two

– accessibility and connections – stem primarily from the continued presence of the derelict Lido buildings and the fact that the development of the Council property on Water Lane has yet to take place. They can only be corrected when those are addressed. Both of these were understood by the authors of the TAAP and anticipated in their proposals. The incidents of anti-social behaviour are rare and do not affect the Gardens alone. More explanation is given in S2 W4.1.2 TRT – Wellbeing and Financial Viability – Statement of Evidence and also on pages 25-26 of S-2 W1.1.02 TRT – response to the Authority’s using S.19(1) of ALA 1981 – Statement of Evidence.

15 The councillors have chosen not to highlight or include pictures of eg the Gardens bursting with people at events, the use of the playground, and the biodiversity and trees that the Gardens contain (all of which are set to be cut down).

16 The councillors also unfairly challenge the Trust’s record on events: “these are infrequent, barely meeting the requirement in the 2014 Management Agreement between the Trust and Council for six events per year”. They contrast it with the use, outside periods of strict lockdown, of Church Street for events through COVID as a safe, open-air site for events. The Trust rejects this comment which compares efforts of a group of unpaid volunteers to the commercial promotional actions of a recently pedestrianised street of commercial units. The Trust’s record has met its full commitment under the Management Agreement save for the COVID period and its events activity has expanded exponentially since the constraints of that time. This year will see around 12 events organised by or in association with the Trust.

17 The councillors also underestimate and disregard the massive distraction – in terms of brainspace and time – imposed on the volunteers of the Trust by the CPO threat, particularly the new trustees who have not known a world without it.

18 The councillors say that “the Trust has proved unable to attract more regular events to the site, such as the weekly farmers’ market that prefers its current location at Holly Road, in a way that might increase footfall and generate income for the Trust”. This is simply untrue. The Gardens have been increasingly attracting

regular events over recent years as evidenced on pages 35 ffg of S-2 W1.1.01 TRT – Open Space on the Scheme – Statement of Evidence. Many of these have been in association with Twickenham BID and Church Street businesses, which also decries the argument that connections do not exist between the Gardens and Church Street. Any opening-up of improved access and connections in the future will only improve the situation.

19 The practical ability to re-locate some of these to the proposed events space on the Embankment is significantly overstated, as addressed on pages 32 and 38 ffg in S-2 W1.1.02 TRT – response to the Authority’s using S.19(1) of ALA 1981 – Statement of Evidence and on pages 9-10 of S-2 W3.2 – An Introduction to the Trust and Twickenham’s Riverside. It is clear, too, that the Holly Road market will not choose to move to the Scheme Land either, as it is not suitable.

Financial sustainability

20 This is another canard. While the Trust accepts that funding will have to be found to meet its future responsibilities post 2024, the councillors start from the negative assumption that the Trust isn’t up to the task. Substantial elements of the maintenance function remain the responsibility of the Council under the lease and much maintenance work can and is already being done through volunteer efforts by the trustees and other helpers. Indeed the Council has not performed as well as it might have in terms of maintenance and repairs for which it has responsibility under the Management Agreement and the Trust has taken on the role of guardian of the state of the Gardens, either chasing the various Council departments on specific defects or stepping in itself. Again, see page 14 of S-2 W3.2 Twickenham Riverside Trust – An Introduction to the Trust and Twickenham’s Riverside.

21 References to past company accounts are not as relevant as presented. Not least because energies over the last three years have had to be devoted to facing the CPO process, during which time the Council’s negotiating offer has included the full maintenance costs in perpetuity. The Trust manages to put on the number of events

that it does, using little or none of its modest budget. It will adjust to meet its future responsibilities accordingly.

Quality of the Exchange Land

22 The councillors say they have “sought to give a realistic assessment of the current Diamond Jubilee Gardens. In our view, the exchange land that has been offered to the Trust is far superior to existing land for several reasons” which again merely reflect the points made in the Council’s Statement of Case: – more open space and public utility, improved accessibility, connection with the river, enlarged play area and utilities (electricity supply) and boat storage, mixed-use development, etc. There is much that can be said on these, with which the Trust disagrees:

- The open space considerations are not as straightforward as presented – see S-2 Twickenham Riverside Trust – Evidence on Open Space on the Scheme and S-2 W1.1.02 TRT – response to the Authority’s using S.19(1) of ALA 1981 – Statement of Evidence.
- Accessibility and connections to King Street and the river are discussed above under para 14.
- The play area and questions of utilities and amenity value are discussed in S2 W4.1.2 TRT – Wellbeing and Financial Viability – Statement of Evidence and also S-2 W1.1.02 TRT – response to the Authority’s using S.19(1) of ALA 1981 – Statement of Evidence.
- The proposed uses and encouragement of footfall are discussed in the Trust’s analysis of section 2 of the Statement of Case in S-2 W3.1 Twickenham Riverside Trust – Planning Policy Evidence. The real question here, however, is whether a CPO is justified for the Council to take control over part of the site – which is currently public open space with the clear intention confirmed, in 2014 through the lease, that it should remain public open space “in perpetuity” – for the purpose of constructing the Wharf Lane building, four floors of which will be dedicated to market-price residential units. And whether this should happen in contradiction of the area-specific provisions of the Local Plan.

23 Like the wider Council, the councillors underestimate the ‘destination’ value of the existing “Riverside Park”, lying as it does at the end of an impressive and historic walk along the Thames path as one approaches Twickenham Riverside and Church Street from Richmond – see S-2 W3.2 Twickenham Riverside Trust – Introduction to the Trust and Twickenham’s Riverside. The TAAP recognised that value and the regeneration that could be achieved by developing the areas adjoining that park and extending and enhancing the Gardens that had already been created there. All of the benefits that are sought in the Scheme are achievable without building on that park and therefore without the CPO.

Concluding remarks

24 The councillors close their submission with a final comment: “on the realistic, practical position should the CPO not be approved. As noted above, the likely result is not merely the status quo (with the deficiencies we have set out) but decline, given the provisions of the existing Lease and lack of success by the Trust in generating income to support its maintenance obligations. It seems highly improbable to us that there would be political will to pursue a future scheme in the foreseeable future, let alone the substantial financial commitment referred to above. Absent approval, the exciting potential for the unique site that is Twickenham Riverside, unfulfilled for more than 40 years, would inevitably remain unfulfilled” (our emphasis).

25 Notwithstanding the counterbalancing views expressed earlier in this rebuttal, this is essentially treating this important challenge for Twickenham residents as a binary issue. The Trust has pointed out the possibility of practical alternatives building on the positive elements of the Scheme and removing or adjusting the primary negative element of the Wharf Lane building, which lies at the heart of this CPO and S.19 process. Given that the Council has agreed a substantial and increasing budget for the Scheme involving considerable debt which will have to be borne by local residents, those same residents should not be held hostage to an all-or-nothing threat by the Council or its representatives.