

Brenda Taplin

From: Brenda Taplin
Sent: 06 June 2023 13:46
To: Brenda Taplin
Subject: FW: Twickenham Riverside Public Inquiry - programme [GATELEY-GHAM.FID85841]

From: Jon Rowles [REDACTED]
Sent: 05 June 2023 22:09
To: Joanna Vincent <Joanna.Vincent@gateleyhamer.com>
Subject: Re: Twickenham Riverside Public Inquiry - programme [GATELEY-GHAM.FID85841]

Dear Joanna,

Please can you pass his email on to the inspector hearing the case?

Dear Mr Rose,

I agree with the other objections raised to the scheme, as I feel there is a need to keep as much of the land next to the river as open as possible, as the land was originally brought to provide recreational land for the people of Twickenham, and Diamond Jubilee Gardens were originally conceived as the first stage of reinstating this park and linking it into the wider Twickenham Riverside and Warren Path. However, I wish to confine my comments to an area that has not been covered by other objectors.

The major issue I do not believe has been adequately covered is the legal status of the unused parts of the former Twickenham Pool site. Does Richmond Council actually own the land in their own right are the derelict pool buildings still part of the park that existed before Twickenham Lido was constructed and held in a statutory trust? This is important because if they do not own the land directly, they are not in a position to exchange it. If it's still a park it calls into question exchanging Public Open Space (POS) if the replacement land is already POS.

The Richmond House site was brought with assistance from the Government (a loan from the Ministry of Health which oversaw town planning back then) to enable the widening of King Street and to provide 'public walks and pleasure grounds' and thus it is likely the was purchased under the 1875 Public Health Act, or alternatively, the 1906 Public Open Spaces Act which means, in either case, a statutory trust WAS created, and the council's role is confined to holding the land in trust for the benefit of local residents. Middlesex County Council (MCC) also contributed a grant for the purchase of the site, one of the aims being to prevent it from being developed. The Riverside area in Twickenham and Ham is famous for its twentieth-century conservation battles to protect this stretch of Thames from development, battles that contributed to the development of national policies to protect views and the concept of green belt which is now the bread and butter of planning inspectors.

One of the benefits of statutory trusts is the council ddoes not have to pay local rates (now business rates) on such property, and this is something Richmond Council has taken advantage of for many years and appears to be still doing. Maybe you can ask the council what business rates they are paying for the derelict buildings, or are they claiming they are still part of the park to the valuation office, whilst making different claims to the enquiry (it's not unknown for different branches of a council to take uncoordinated stances)? I searched the Government's online business rate checker service and these buildings do not appear to be registered for business rates despite checking using the postal address and postcode options.

To deal with the issue of the use of the land between the closure of the pool and today; you can erect buildings in parks in London to house caretakers and facilities such as swimming pools, gymnasiums, or facilities for community

use. When the pool closed the caretaker's house was used to accommodate local charities for a number of years whilst the former lido refreshment room was converted into a sports hall for local community sports clubs; all these uses are compatible with the land being a park under the Local Government Provisional Order Confirmation (Greater London Parks and Open Spaces Act 1967).

I have visited the Richmond Council local history centre at Richmond Old Town Hall and can see no record of the site having its status changed by any formal procedures/appropriation by the council, nor is there any evidence on the Richmond Council website that allows you to search more recent council minutes. Thus, **I believe the former pool buildings are still a public park, held in a statutory trust and still formally a public open space and the land is thus not available for exchange with land from Diamond Jubilee Gardens.** This issue can only be resolved by careful inspection of the former Twickenham Council and Middlesex County Council minute books.

I would find it unacceptable for the Diamond Jubilee Gardens to be replaced with existing parkland/POS, and any compulsory purchase order that incorporated an element to this would be at risk of a judicial review, and unnecessary expense for both sides of the argument. Therefore, I would like to respectfully ask that you establish the exact legal status of the derelict parts of the pool site.

Yours faithfully,

Jon Rowles

