

Twickenham Society statement at Planning Inspector's meeting

7th June 2023

I welcome the chance to raise the Twickenham Society's concerns in person with you Mr Rose.

I shall concentrate mainly on the two issues that concern us most about this development, namely that (1) it basically ignores the fact that it is based in a unique and historic riverside Conservation Area. And (2) our concerns for the safety of pedestrians, in particular those who are elderly, children, disabled or sight impaired.

To start with – Conservation Area.

As you drive through the town you are not aware of the fact that behind the tall buildings on the high street there is a river. It is only when you go down the narrow and in some instances medieval streets that you actually catch a glimpse of the water.

As you approach the Embankment you will see that there is a pub adjacent to a working slipway and boatyards, a cafe, a riverside walk and riparian activities taking place. Opposite there is an island and there are people living on barges on the opposite bank.

If you turn round you are faced with a huge wide terraced open space, uncluttered with buildings - just a framework of impressive buildings sympathetic to their location situated at the very back of the site. It's quieter in the winter on these terraces because there is less happening on the river but is a place where people stop and rest, take in the scenery and recharge their batteries. And it is very much loved.

I am of course talking about the Richmond Riverside Conservation Area but it does equally describe the Twickenham Riverside Conservation Area in almost every respect.

In Twickenham, as with Richmond, you can't see the river as you go through the town. It is only when you walk down the little streets and alleyways that you become aware of it. These little streets are where the watermen and lightermen used to live – those who worked on the boats, barges and boatyards of the Thames.

We too have a pub on the Embankment and there are active slipways and a lovely, recently built, riverside walk and a popular cafe. New developments have respected this scale and the listed St Mary's Church has remained the village's focal point.

The island that is opposite Richmond is called Corporation Island and is home to herons. Twickenham's Eel Pie Island however is teeming with life except at either end of the island which have been left as nature reserves, preserving the rural character of this area. The opposite bank, known as Ham lands, is free from development.

The problems and pressures for development are identical for both Richmond and Twickenham Riverside Conservation Areas, namely , and I quote, *development pressure which may harm the balance of the river and landscape dominated setting, and the obstruction or spoiling of views, skylines and landmarks.*

So far opportunities for development have been understood and protected in Richmond. Ours on Twickenham Riverside are under threat. Once again we are faced with the prospect of our open space being dominated by a domineering block of private flats.

We have searched through many of the hundreds of Council documents relating to this CPO to find reference to the Conservation Area. Mr Chadwick doesn't mention it in his Statement of Evidence, the 4 local Councillors in their support of the scheme don't refer to it, neither does Mr Bannister, the Chief Architect. The majority of the scheme's few supporters ignore it. And even Mr Tait left it out of his presentation yesterday. . Looking and listening for for the words "Conservation Area" reminded us a little of the Basil Fawlty "Don't mention the war" sketch. In our case it was "whatever else you do, don't mention the Conservation Area, only refer to it as a town centre development" as Mr Bannister did yesterday in answer to a question from you Mr Rose.

We agree that the Council's derelict brownfield site is in urgent need of being developed as it is a blight on the whole riverside area. It should be blended in sympathetically with the Diamond Jubilee Gardens, thus opening up the gardens to the east.

Opening up and widening Water Lane is a good idea but you might be surprised to discover that if you stand on the pavement on King Street and look down the road you won't be able to see the river, unless it has flooded.

Much is made of the successful pedestrianisation of Church Street and we support it. It is a charming narrow street with little shops and cafes on either side, plus a couple of pubs and the Twickenham Club. It used to be the main road to London in days of Horace Walpole and Alexander Pope, two notables who lived on Twickenham Riverside.

Church Street lends itself to open air dining, street markets etc even in the winter. Twickenham Embankment is another matter and won't have the same attraction with the river on one side and a concrete podium and flight of steep stairs on the other, especially on a cold winter's day or February evening but the shops and cafes on Church Street will be twinkling with life. The Embankment is more likely to be a race track for cyclists, scooters and skateboarders.

And what would the man on the top of the Clapham Omnibus think of the Wharf

Lane building. Let's call him Charlie.

Charlie had read the Council's Local Plan, adopted 3rd July 2018. He knew that it said that “tall” buildings would only be appropriate in the Twickenham Station and Twickenham Stadium areas, and “taller” buildings may be appropriate in Twickenham centre. Elsewhere they would be inappropriate.

So he then looked up the definition of “tall” and “taller” buildings as defined by the Council.

Under 4.2.3 of the Local Plan 'Taller' buildings are defined as those being significantly taller than the neighbouring buildings, but less than 18 metres in height (below six storeys); a 'tall' building is defined as a building of 18 metres in height or higher.

Charlie stood on the Embankment and looked up at the 21 metre high building towering above him. He knew that at ground level behind the concrete flood barrier was what was called the Lower Ground Floor and housed the plant machinery and bicycle racks for the building. Looking up he could see there was a pub on a level with the Diamond Jubilee Gardens and then above that was four more storeys of private flats – 6 storeys in total. He noted that the Planning Committee had decided that the Wharf Lane building was only 14.4 metres high which might have made planning sense to them but not much sense to Charlie.

Also the Wharf Lane building was obviously higher and bulkier than the Conservation Area surrounding it. It not only altered the historic skyline and character of this unique riverside village, it was dominant in the views from both upstream and downstream. If the trees hadn't grown so tall around Marble Hill Park it could even have spoilt the view from Richmond Hill, the only view protected by an Act of Parliament in 1902.

It was also higher than any other buildings in the high street nearby and wondered whether that would give the go ahead for the King Street Parade to add another storey of flats, something that is rumoured down the pub.. This parade of shops and flats isn't included in the Conservation area.

Noted also was that new buildings alongside the river needed to be functionally related to the river and include river-dependent or river related uses. Does the boat storage rack alongside the podium fulfil this requirement he wondered.. It certainly dominated and detracted from the conservation area in which it was situated.

Mr Rose – what is the point of having development rules for Conservation Areas if they aren't adhered to?

Turning to Safety Issues, traffic and parking.

We don't object to the removal of parking from the Embankment, unless it does harm both to businesses in the town centre and those on Eel Pie Island. An experimental traffic order has been on the cards for years now to see if this is feasible but this has now been kicked even further down the road and is being left until "project construction" Mr O'Donnell tells us. Why? It could be done now. Is the Council too worried that it might show that the town has need of this parking?

The Council is relying on the Arragon Road car park to absorb the loss of parking on the Embankment. It is an old car park with out of date spaces for the modern car but because of its concrete columns these spaces can't be widened. Instead the Council is considering the provision of wider bays at the higher levels of this car park for those with wider vehicles. With Ulez coming to Twickenham in a couple of months time the number of heavy electric cars is likely to increase. There is a worrying report in the papers this week about electric cars being too heavy for old multi storey car parks built in the 1960s and 1970s and that they should be demolished and rebuilt. The Arragon Road car park was built in the early 1970s so will come under this category. Then where will people park? The Council should take this into consideration because a further 437 vehicles may be seeking parking places in addition to the 82 being removed from Twickenham Embankment.

And the one way system? Successive Inspectors and even the Council's own outside road safety auditors have recommended leaving the one way system in place. It is shown to work. We are told that if a Stage 2 Safety Audit showed up safety problems then mitigating measures would be put in place. Might this mean retaining the one way system we wonder?

But the Twickenham Society still maintains that the Stage 1 Safety Audits have not yet been completed. Huge attention has been made to re-arranging the junctions of Wharf Lane/King Street and Water Lane/King Street for the safety of pedestrians to be at an acceptable level.. The silence on their safety on the junction with Water Lane and the Embankment to include Eel Pie Island is deafening. We can only assume that the problems there are insurmountable.

We have challenged the swept paths of vehicles turning round at the bottom of Water Lane as they are incomplete and don't show what happens when rigid lorries are parked up alongside the single yellow line. We have asked for safety audits for when the area is flooded and what will happen to vehicles stacked up in Water Lane, unable to turn round, while service vehicles will be blocked trying to leave the service area at the foot of Eel Pie Island bridge and unable to turn left and exit up Wharf Lane. There is a suggestion that a Council official will pop down to open up and close down the barriers twice a day on the frequent times when the road floods here..

The only one answer the Council has for the safety issues for pedestrians, old, young, disabled, sight impaired, some maybe in wheelchairs or pushchairs – for the safety of all these people there will be high contrast tactile paving crossing Water Lane. There is not a single mention of people trying to reach the Eel Pie Island bridge from every direction. Has the Council airbrushed it out of the equation because it is too difficult to resolve to an acceptable standard.

Please could Mr O'Donnell explain to Mr Rose why there is only reference to the Eel Pie Island Service Area and not a single reference to the residents, the businesses, the rowing club users, workers in the boatyards, people living on barges, the artists colony and their open days when 2000 people a day attend. Both the Rowing Club and Richmond Yacht Club on the Island have popular function rooms that are financially crucial for their existence. This means that not only catering and flowers etc have to be dropped off and taken over the bridge, but also the wedding and party guests will be arriving by car to be dropped off and picked up later. Just like the “Dont mention the war” moment with the Conservation Area we find it happening again with Eel Pie Island and the pedestrians who need to come or go there. Is the justification that the island isn't in the scheme land?

Safety is also an issue with the removal of the current Diamond Jubilee Gardens by a Compulsory Purchase Order. The gardens are situated in a safe area above the flood plain. Small children are kept even safer in a fully enclosed playground. The Council's Rebuttal Proof of Evidence refers to this as people being corralled into an area. This extraordinary statement must have been written by someone who isn't a parent or grandparent, or who can't remember what it is like to be in charge of two or three youngsters, when one of them is likely to dart off away from the group. On the present gardens they are safe. They can run around kicking a football without it disappearing into the Thames, learn to ride a tricycle in safety without getting in the way of other cyclists on a road.

Last night a Twickenham Society member sent me an email pointing out that in the new development there is a path leading from the top of the gardens down to Water Lane. He said that children being children will use it as a race track on their scooters and skateboards and asked me to find out what safety measures have been put in place to stop the youngsters from hurtling into the street at the bottom.

Mr Rose, you may think that our presentation is a bit flippant but I can assure you that we are deadly serious about protecting our riverside conservation area from an inappropriate and unsympathetic tall block of private flats, and yet another pub in our town. But this will only come about if the Council's CPO is allowed to go ahead. The Twickenham Riverside Trust knows that it has our support, as do those running the boatyards as well as the residents and businesses of Eel Pie Island and those living in the houses in the Conservation Area.

Safety on our streets is paramount and has still not been fully addressed.

And crucially, on top of all our safety worries, the Council will need to add into the equation a couple of years of massive construction traffic on this busy site and the problems that that will bring. It beggars belief to say that this area has no safety issues. In our view it's an accident waiting to happen.

Thank you.