

For 08/06/2023 Enquiry

- Helen Montgomery-Smith.
- Director Eel Pie Boatyard Ltd since 1997 – proud to be part of Twickenham's historic Waterfront.
- Chair of Eel Pie Island Association
- Early Years Teacher, Special Educational Needs Co-ordinator/Disability Consultant in Richmond Borough for 25 years.
- Local Resident since 1992.

[Re : London Borough of Richmond Upon Thames \(Twickenham Riverside\) Compulsory Purchase Order 2021, Compulsory Purchase of Land and New Rights in Twickenham Riverside](#)

08/06/23

Attached is a presentation by Eel Pie Boatyard for a workshop organised by the council during one of the community consultations regarding the redevelopment of Twickenham Riverside in 2016 it is a summary of Twickenham Working Waterfront for information purposes.

We are owners and managers of one of the 4 boatyards on Eel Pie Island, we have been running Eel Pie Boatyard Ltd for 25 years. We have also been part of discussions with the Twickenham Riverside team as chair and members of Eel Pie Island Association.

The road and river access at Twickenham Embankment enables the Working Waterfront. Eel Pie Slipways, Phoenix Wharf Slipway, Cruisemaster Ltd and Eel Pie Boatyard Ltd have their river related infrastructure that allows them to trade. There are hardly any boatyard facilities left in Richmond Borough.

The Embankment infrastructure of the Waterman/ loading steps, draw dock and slipway at the bottom of Water Lane and Champions Wharf enable river related use for the boatyards, their customers, clubs and the public to access the river/visit the town and launch their own small craft etc.

This Embankment and Riverside is the only one in Richmond Borough that still has the original waterman steps and wharf being used by the townspeople and visitors for businesses, leisure and recreation. This is a significant contribution to the conservation area.

This Embankment and Riverside infrastructure of the walkway and promenade, provides a cohesive pedestrian walkway with seating close to the River from Champions Wharf to Wharf Lane. It is used constantly by the public it is responsible for the well-being and mental health of the locals and visitors to Twickenham. This is significant use and must be preserved.

It is essential that existing all the uses and existing users are still able to take place and that the proposals do not have a significant impact on the local community.

A local town centre redevelopment should be viable for businesses and contribute positively to the quality of everyday life for the residents and visitors.

We are not there yet!

Local character and the village feel of Twickenham Riverside, this reach of the Thames is truly unique and in a conservation area, is under threat by the Wharf Lane building.

Attached is a presentation by Eel Pie Boatyard for a workshop organised by the council during one of the community consultations regarding the redevelopment of Twickenham Riverside in 2016 it is a summary of Twickenham Working Waterfront for information purposes.

We object to the above Compulsory Purchase Order of the lands and New Rights in Twickenham Riverside for the following reasons.

POINT 1. The site is opposite Eel Pie Island a unique location with the only access via a footbridge falling within the site boundary.

- Eel Pie Island Bridge and the Embankment at Water Lane is the infrastructure that enable the rich mix of activities and the Twickenham Working Waterfront and is where everyone gets all of their deliveries.

11.36 In response to the third point, the Scheme would remove parking from the Embankment and would limit use of the Embankment to vehicles between 7-10am or for emergencies, unless arranged in advance. This is a key priority in the TAAP(CD2.5), which seeks to reduce the impact of motorised traffic and car parking. It was also an ambition of the Scheme to deliver a pedestrian priority area on the river. Water and Wharf Lanes would be made two-way in the Scheme allowing for servicing and access to Eel Pie Island at all times for all but the largest vehicles (over 7.5 tonnes), which would need to use the Embankment. Through discussion with Eel Pie Island Association (which represents residents and businesses on the Island), it is the Council's understanding that vehicles of this size are infrequent (around 3-4 times per year), and as mentioned, they will be able to access the Embankment between 7-10am or by prior arrangement.

- Overarching concerns of regarding safety, practicality (two-way working and turning) and functionality were expressed at every EPIA meeting with the team.
- Basic practical, environmental and essential points none of which were fully resolved in the meetings with Twickenham Riverside Team.
- Servicing the Island takes place all day long.
- This shared access is used by the businesses, clubs, the residents and their customers and visitors.
- The everyday footfall of customers/visitors/delivery drivers and community coming on and off the Island is considerable.
- COVID 19 changed how businesses and people shop and has increased deliveries on the island.
- The figures used by the Council are not indicative of what we see daily.
- The traffic and service figures given for the transport analysis do not accurately reflect the current numbers.

- Using inaccurate and out of date statistics especially regarding servicing should not enable the proposed changes.
- Consultation took place during the Covid pandemic when the businesses and the clubs were in lockdown.
- It is crucial that a full current rigorous transport assessment is carried out with full in-depth feasibility and safety studies at all junctions.
- The loading bays are all full and it is commonplace to see at least 2 large trucks at the same time parking on single yellow line both sides of the Embankment Road.
- 11.36..... it is the Council's understanding that vehicles of this size are infrequent (around 3-4 time per year) Clarification below.
- In the last month, Eel Pie Boatyard Ltd (let alone the other yards) had 5 steel deliveries as result of current jobs and all the other associated deliveries of smaller items parts, consumables etc.
- Delivery Materials for steel and timber arrive in large flatbed trucks – Steel/Timber deliveries are related to jobs.
- Manufacture of steel pontoons and gangways materials are priced and ordered as appropriate.
- Condition of the Hull of a boat is examined, all large houseboats/trip boats/leisure boats which are driven/towed to the slipways/ wharf require surveys, these are carried out by Boat surveyors who are subcontracted in to make recommendations and produce a report for the customers' vessels insurance.
- The hull may need a complete over- plate/re-plank or cut out and have new steel/timber replaced.
- Industry standard for the deliveries on Eel Pie Island – Once delivery day is confirmed the driver will generally give 45 mins – 1 hour notice to the yard of arrival. Negotiations and exact timings are not able to be dictated by the customer.
- All the suppliers' trucks are driver only, offloading takes place using hijab cranes or drop tail lifts etc.
- Large vehicles egress along the Embankment and circulate and leave safely and independently via Wharf Lane. There are no banksmen.
- All materials are then taken back to the Island either usually using trolleys or punts.
- Collecting deliveries takes time and pulls employees off the job in hand.
- The potential disruption to suppliers and their delivery drivers due the proposed changes is very much unknown.
- The high tide floods the proposed service area at the bottom of Water Lane, on high spring times and when the river is in flood the environmental due to heavy rainfall or tidal surge.
- Vehicle turning is not possible at high tides, egress has to be via the Embankment and Wharf Lane
- Computer aided drawings of the possible turning of the vehicles did not include everyday life scenarios and the presence of the tide, cyclists and pedestrians.
- The planning permission was given subject to planning conditions NS22, NS23 and NS25
- These planning conditions show that the highway department is aware that the proposals are untried and untested, and more work needs to be carried out.

We believe that 10.10.3 is not valid when vital practical issues are not resolved.

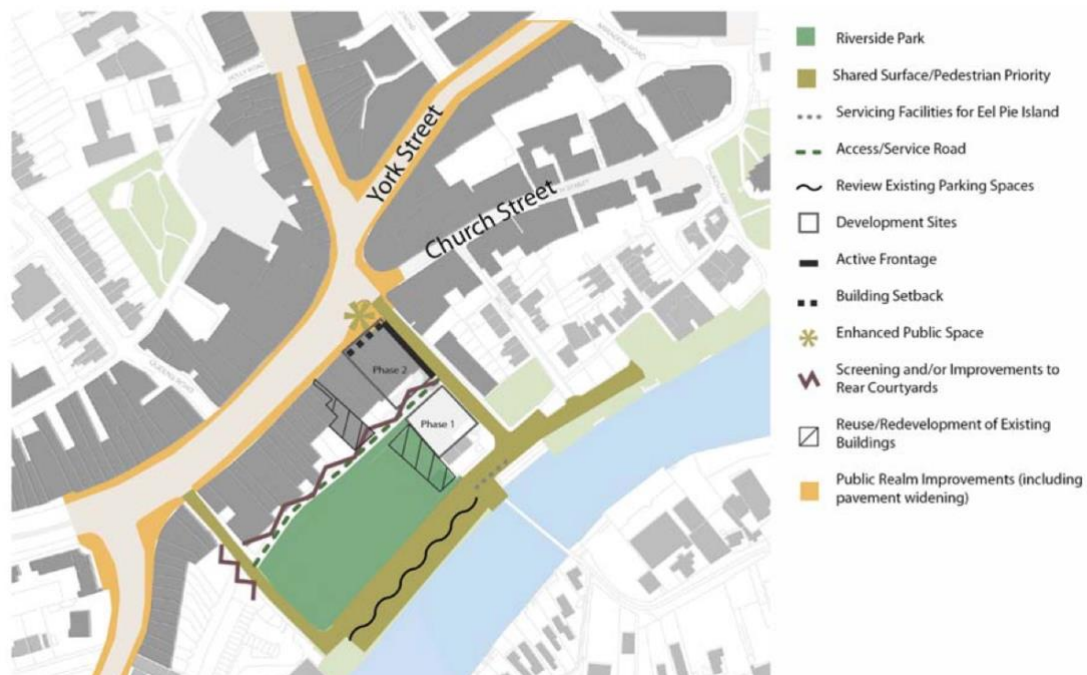
Statement of Case states.....

- “10.10.3 Maintenance of the Embankment as a working quay through the retention of servicing/parking bays for Eel Pie Island, controlled servicing access along the Embankment and retention of one mooring.”

POINT 2 The exchange land contains the Embankment Road, which is our access and highway.

It is relevant to note that the Twickenham Area Action Plan (TAAP) which features heavily in the statement of case as justification for the development recommends retention of the circulation.

Map 7.12 Twickenham Riverside and Approaches Principles



- This shared surface and pedestrian priority is used currently, at weekends the pedestrians truly take priority, and a Village atmosphere is set on the Twickenham Embankment.
- This access that is in the public realm should not be part of the exchange land, there will always need to be access along the Embankment.

Statement of Case

11.39”The Embankment would continue to be accessible within the Scheme”

- The Twickenham Area Action Plan (TAAP) hearing in February 2013 was an opportunity to clarify planning guidance for this unique Riverside Site. To give an

independent inspector's advice and to determine the guidelines and set the parameters for the redevelopment of Twickenham Riverside.

- The Inspector concluded.
"Nevertheless, I remain of the view that it is essential the Council attaches a high level of importance to meeting the parking needs of the Island residents and businesses in order to maintain the vitality and viability of the working waterfront. "
- During EPIA and the meetings with the Twickenham Riverside Team, there was no possibility in mentioning the impact of the parking. It was very much a done deal, and any difficulties could be sorted out during the Experimental Traffic Order.
- Highways and transport meeting 15th June 21 state that the true impact of the loss of parking on the Riverside is unknown.
- Parking can be removed from the Riverside without any sort of compulsory purchase order of the Trust's land.

POINT 3 A stopping up order was not included in the recent planning application relevant to the site.

- The stopping up order is in the current CPO paperwork.
- The stopping up order land pushes the necessary access for larger vehicles closer to the river edge.
- Narrowing the road on the corner by the proposed plinth and additional landscaping creates blind spots for pedestrians and cyclists etc. Safety management required.
- Modifications to the stopping order include plots of land that involve change of uses that need further discussion.
- The corner of the Embankment with Wharf Lane and the River needs protection from traffic manoeuvring.

POINT 4 : This road gives safe access for all vehicles to circulate and load and unload and is essential infrastructure for our everyday life.

Statement of case 11.33 informs that the Stage 2 Road safety audits have not taken place.

- Safety concerns came up in every meeting with Twickenham Riverside Team
- Assurances were given that full independent safety assessments would be carried out.
- Feasibility and traffic flow must be related to appropriate data information and represent realistic everyday scenarios for accurate analysis.

- The scheme needs a full safety audit taking account of the traffic, pedestrian and cycling movements.
- Highways and transport in the officer's report for planning permission mentions "short comings regarding the swept paths and manoeuvrability for certain vehicles around the site"
- Citing there will be "low traffic volume and speeds" does not mean that the area is safe or the turning feasible.
- Stage 2 safety orders need to take place, given that this has been a running theme through all meetings with EPIA and objections it is baffling why it still has not taken place.
- The council are not able to answer the valid concerns of local current and existing users of the Twickenham Riverside Area

WHY HAS THERE NOT BEEN AN EXPERIMENTAL TRAFFIC ORDER CARRIED OUT TO TEST THE TRAFFIC AND HIGHWAYS PROPOSALS PRIOR TO THE CPO?

HOW WERE THE SYSTRA MARCH 2019 TRAFFIC SURVEY DATA COLLECTERS BRIEFED ABOUT SPRING AND NEAP TIDES?

WERE THEY AWARE THAT THE AREA WAS SUBJECT TO FLOODING?

WHAT IS THE IMPACT FOR THE DEVELOPMENT IF THE SAFETY AUDITS AND EXPERIMENTAL TRAFFIC ORDERS COME BACK AS NON-FEASIBLE FOR THE TWO WAY WORKING UP AND DOWN WHARF LANE.?

HOW ARE LOCAL USERS GOING TO LOG DIFFICULTIES DURING THE EXPERIMENTAL TRAFFIC ORDER?

HOW ARE THE INDEPENDENT SAFETY AUDITS BRIEFED?

ARE THEY AWARE OF THE TYPES OF VEHICLES THAT SERVICE THE TWICKENHAM RIVERSIDE AREA?

ARE THEY AWARE OF THE LARGE FOOTFALL OF PEDESTRIANS GOING ON/OFF EEL PIE BRIDGE?

ARE THEY AWARE OF THE CYCLISTS?

WHAT HAPPEN IF THE EQUALITY IMPACT ASSESSMENT ON THE PARKING SERVICING AND ACCESS CAN NOT BE PROGRESSED TO IMPLEMENTATION?

Statement of Case

11.33 In response to the second point, as explained above, a road safety was considered as part of the planning process including the submission of a Stage 1 Road Safety Audit. The Audit concluded there were no issues identified with the general arrangement, local alignment, cyclists, traffic signs, carriageway marking and street lighting. It recommended minor adjustments to the alignments of Water and Wharf Lane junctions.....

- 11.33 Stage 1 Road Safety Audit text is very different from the first one published below

Transport assessment part 4 of 5 Appendix G – Road Safety Audit Stage 1 (original Stage 1 safety Audit) stated:

“3.2.1.

Summary: Insufficient width at junction mouths, resulting in collisions between vehicles travelling in opposite directions and collisions between vehicles and pedestrians.

Recommendation

If possible, retain the one-way arrangement for Wharf Lane and Water Lane. As a minimum, provide bell bollards or other physical features on the corners of the junctions to protect waiting pedestrians.”

- The above recommendation “retain the one-way arrangement” has been lost in the documentation.
- This leads to concern regarding transparency.

Statement of case 11.32 states “The highway (roadway) element remains unchanged, with the exception of the removal of some on street parking to allow for two-way movements.”

- 11.32 relates to Water Lane.
- The closure of Church Street to traffic (10.00-00.00) is popular and well used and has created not a town square but a town street area akin to a plaza on the continent and has created a pedestrian buzz for the town.
- The impact of the above road closure has meant that deliveries for Church Street during the closed hours now take place on the new service bay at the top of Water Lane.
- Large vehicles unloading are parked up for longer periods as drivers walk down Church Street to deliver their stock.
- These deliveries will bring more turning traffic at the bottom of Water Lane

Statement of Case 11.36 ...” This is a key priority in the TAAP(CD2.5),which seeks to reduce the impact of motorised traffic and car parking. It was also an ambition of the Scheme to deliver a pedestrian priority area on the river.

- The view of a turning circle at the bottom of Water Lane and the two-way traffic and manoeuvring of vehicles, shifts the impact from one part of the Embankment to another area of the Embankment.
- This area has a ramp from the proposed area coming straight into the road with the possibility of children on scooters. Safety concerns.
- This area has children/families looking at the river and the wildlife.
- This area is for loading and unloading materials.
- This area is used to launch paddleboard and canoes.
- This area has an established ice-cream van that is visible from Water Lane and a natural draw to the river. (It moves with the tides and the deliveries)

- The impact of the motorised traffic at the turning circle is relevant and significant and will have detrimental impact on current public uses and public safety.



POINT 5 This road closure will be detrimental to the public who use currently use this highway.

- The road closure will have a significant detrimental impact on all current users of the Twickenham Riverside Area especially the businesses, clubs and residents on Eel Pie Island
- The proposed servicing area does not equal or better what is currently available.
- The loss of safe circulation and the ability for visitors/tradesmen/carers/customers/subcontractors to park on the embankment and then carry tools, equipment over the bridge and use their vehicles as a base.
- Dropping stuff off then having to find a parking space is problematic.
- Discussions with the Riverside team tried to address this but it does not equal what is currently present, and crucial practical details are not finalised.
- Statement of case 11.36, 11.37, 11.39 require feasibility and safety audits are not currently fit for purpose and the existing servicing level for Eel Pie Island has not been accommodated.

10.12 The Council is satisfied that the Scheme represents a significant investment in the area, the benefits of which will be considerable to the economic, social and environmental wellbeing of the Borough. Paragraph 103 of the CPO Guidance is clear that *"the benefit to be derived from exercising the [wellbeing] power is not restricted to the area subject to the Compulsory Purchase Order, as the concept is applied to the wellbeing of the whole (or any part) of the acquiring authority 's area."* As such, the Council and Secretary of State are required to consider the benefit to the local area and the Borough when assessing whether, and to what extent, the redevelopment is likely to achieve the promotion of the economic, social or environmental well-being of the area.

POINT 6 The road enables equality of access to the public of any ability to have direct access to the River Thames in Twickenham.

- There are very few places where the road and river still meet.
- The most accessible Riverside in the borough.
- The current road allows visitors to come to the Riverside with the pay and display parking.
- Twickenham Riverside is so accessible, it is a common site to see a family with at least 3 generations come to spill out the car and they walk the promenade at the pace of the youngest and the eldest family member. (no blue badge generally)
- Paddleboards, inflatable canoes, small dinghies small craft, the infrastructure of the slipway and Waterman's steps enable these uses.
- During the 2020 and 2021 lockdowns the use of the embankment for small craft on Twickenham Embankment was truly recreational and the busiest, whilst delivering a boat to the Medway during lockdown, there was not a stretch of the Thames with as many people simply enjoying being on the water.
- Families with neuro atypical children come to see the water, reflections, fresh air are immediately available through the Embankment promenade.
- The planting and the benches provide a place to come to and be close to the waters edge without retail pressure but just to get away from it all briefly.
- It is well used and important to the area. During the 2020 and 2021 lockdowns the use of the embankment seating in the area in the photograph was vital for the public well-being.
- The mental health benefits of being able to have your own relationship with the river, in a safe space not far from help if needed, is important. The fact that it is not a thoroughfare and truncated allows the observer true reflection, and a feeling of ownership with the river without people coming past interrupting the thought processes.
- Championing people with additional needs has been part of my professional life.
- Running a boatyard in this area for the past 25 years, has been an insight on how important the access to the river is for individuals, helps understand the infrastructure needed for happy healthy society.
- The impact of bringing an event space down to the river and attracting crowds could change the whole nature of the Embankment and it's recreational uses.
- This development has the potential to change this area so much the well-being for some of the most vulnerable people in our society is at risk.

POINT 7 The purpose for which the Council is proposing to acquire the land can be achieved by other means.

- Adherence to the plan in the TAAP MAP 7.14 with designated uses.
- Outline planning permission was given for the scheme that kept the access way and allowed the local community to keep their infrastructure and go about their daily lives.

- It was never followed through because of a change in administration.
- The high street has lost nearly all the banks, there are many empty shops.
- Use empty shops for community projects or change of use to affordable living spaces.
- The derelict buildings on the Riverside should be developed.
- Retain Jubilee Gardens it provides a true recreational play area for the locals.
- It is very different from Richmond Riverside; the community café puts people with additional needs in the forefront and gives them a town centre stage.
 - The Diamond Jubilee Gardens where multigenerational play can be seen taking place all through the day by locals and visitors.
 - In the morning children from the local nurseries use it for Circle Times. The children sit down take turns and have open air lessons in an environment that they have fresh air and being taught social skills.
 - Mid-Morning there are often exercise classes taking place 1:1 style with person trainers/or individual doing keep fit workouts.
 - Carers/Parents playing ball skills with small children throughout the day.
 - Lunch time secondary school students in groups playing similar circle times but arranged by themselves playing ball and keep it up type games.
 - After school small groups of children with parents on the way home cartwheels chase me style games.
 - After school secondary school students come back and play/talk/hang out.
 - Tai Chi Practice by locals
 - Petanque
 - Chase hide and seek.
 - Scooters/learning to rollerblade
 - Sand Play digging and sensory play.



- (A) Open space (excluding the area where there are currently buildings), a mixture of hard and soft landscaping to allow a variety of leisure activities, playground and café;
- (B) Reuse or replacement of existing buildings to provide mixed uses with active frontages at ground floor level;
- (C) In long-term, subject to agreement of the community, potential low rise leisure and community pavilions closer to the service road area, to enliven the area and allow public enjoyment of the riverside open space;
- (D) Redevelopment or reuse of former public toilets fronting Water Lane for residential, leisure or café use;
- (E) Redevelopment or partial redevelopment of 1, 1a and 1b King Street with setback or inset to create a public square or other civic space with active frontage at ground floor level and residential development above of a height and design appropriate to the location of the site;
- (F) Redevelopment of the car park in Water Lane with residential and/or town centre uses together with the continuation of the service road between Water Lane and Wharf Lane.

WHY DOES THE PROPOSAL NOT COMPLY TO THE TAAP (C) ABOVE?

The Wharf Lane building proposed does not constitute low rise community pavilions.

Helen Montgomery-Smith