

**LBR42 / INQ 36**

**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 AND  
SCHEDULE 3 OF THE ACQUISITION OF LAND ACT 1981**

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**RESPONSE TO EVIDENCE OF TED CREMIN (TWICKENHAM  
RIVERSIDE TRUST) – INQ23-4**

**LBR 42 / INQ 36**

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1. **INTRODUCTION**

- 1.1. This note is in response to new points raised in “INQ-23-4 Ted Cremin – Justification”.

2. **RESPONSE**

- 2.1. This section addresses new points raised in the document, which are themed below.

**Public feedback on the 2017 Scheme**

- 2.2. This is addressed in paragraph 5.7 of **LBR-1A**, which details that results of a consultation carried out in October 2017 on this scheme “demonstrated that support for the site layout plan and building appearances was low and people wanted parking removed from the Embankment”. Mr Cremin’s page 14 is incorrect in saying there were no objections to buildings or open space in respect of the planning objection, which he accepted.

**Environment Agency requirements to the 2017 scheme**

- 2.3. The suggestion made by Mr Cremin of bringing the flood defence wall out by 500mm would result in a loss of flood storage which would not be compliant without further material amendments to the scheme.

**Removal of parking in the 2017 scheme**

- 2.4. The 2017 scheme included a podium level car park, the entrance of which was from the Embankment. It was designed with the Embankment through route remaining in place. The removal of parking was not part of the design of the 2017 scheme. Should parking have been removed a new open space design would be required, as the issue would still remain of the disconnect between the Gardens and the river.

**2017 scheme demonstrating an alternative**

- 2.5. Negative comments have been made by the Trust about the podium in the Scheme that exists underneath the Wharf Lane building. The 2017 scheme effectively doubles or almost triples the size and the extent of that podium by extending it all the way to Water Lane and up the side of Water Lane. The buildings in the 2017 scheme facing the river are built at podium level, they are three storeys with a pitched roof.

- 2.6. The 2017 scheme introduces an imposing set of steps at the corner of Water Lane and the Embankment that does little to encourage people to interact with the space above as they would not be able to see much given the differences in level.
- 2.7. Whilst comments have been made by the Trust about the impact of the Wharf Lane building on sunlight to the western part of the Gardens it should be noted that the Water Lane buildings in the 2017 scheme will have a much greater impact on daylight and sunlight to the existing properties on the other side of Water Lane than the 2021 scheme will do, as can be seen from the comparison drawings on page 130 of the Design & Access Statement (**CD 3.03**).
- 2.8. The biggest difference however is that the 2017 scheme is far less ambitious. It lacks anything substantial to draw people through to the southwest corner of the gardens, and therefore does not bring the benefit of passive surveillance from both sides of the scheme. With all the buildings concentrated on the podium at the Water Lane end, the relationship to the Diamond Jubilee Gardens feels like that of a “back garden” rather than being the centre of attention and is likely to lead to the space continuing to be under used.

#### **Housing units 2017 scheme compared to the Scheme**

- 2.9. It is unclear what is meant by units on page 15 of Mr Cremin’s statement. The 2017 scheme delivered 39 residential units, only 6 of which were affordable units (all intermediate housing), in what was a much larger building footprint on the Water Lane end of the site. The two buildings are close together and break up the open space on the site.
- 2.10. The current Scheme delivers 45 units, 21 of which are affordable units (at a policy compliant tenure of 81:19 social rent to intermediate). The 2017 design did not allow for a widened Water Lane in the way that the Scheme does given the amount of development at that end of the site. The Wharf Lane building of the Scheme spreads the developed area across the site, bookending the western end of the site. Having residential units at this end of the site will create activity and will help with natural surveillance.

#### **Support for current Scheme**

- 2.11. The support for the current Scheme is far more than just the removal of parking. Please see the Statement of Community involvement (**CD3.13**) which also details responses to questionnaire which formed part of the public engagement held in January to February 2021

where alongside removal of parking respondents also liked the open space and greenery, views of the river and the opening up of the town centre to the river.

### **Consideration of alternative schemes**

- 2.12. It has long been a desire of the Council to redevelop Twickenham Riverside following the closure of the swimming pool some forty years ago and the resulting derelict buildings. A number of attempts to fully redevelop the area have come forward in the past for several different parcels of land, both by the Council and private developers. None of these previous applications have included an area as large as the Scheme Land and they have all failed for several different reasons.
- 2.13. During the RIBA Design Competition five architect led teams were shortlisted and developed concept designs. Alternatives were considered at that stage. Hopkins also went through a design development process (as detailed in Section 7 of **LBR -2A**).
- 2.14. The Trust supported the RIBA Design Competition process and the Hopkins' concept design. As mentioned in Inquiry by Mr Chadwick, and detailed in **LBR5** and **LBR5A**, there were years of engagement with the Trust. It is only in the latter stages that fundamental issues with the Scheme, and the Wharf Lane building in particular, arise. The Council has always been clear that a whole Scheme Land solution was required, which the Trust signed up for as part of the RIBA Design Competition, and through a comprehensive design process has resulted in a Wharf Lane building that brings a number of benefits to the Scheme as well as the best design solution.