

Hello everyone,

## **Planning application for Twickenham Riverside development**

The Council has submitted its planning application for the redevelopment of Twickenham riverside and this is now available on-line, with 17<sup>th</sup> September the deadline for response.

Formally, the reference is «21/2758/FUL relating to 1-1C King Street, 2-4 Water Lane, the Embankment and river wall, Water Lane, Wharf Lane and the Diamond Jubilee Gardens, Twickenham».

The documentation is voluminous, for this major project. The most important documents are probably the 'Planning Statement' and the 'Design and Access Statement' (this alone 300+ pages divided online into 13 parts), but those on 'Heritage and Townscape', on 'Landscaping and public realm', and on 'Transport' and on 'Deliveries' may also be of interest. Between them, these include a lot of repetition (coming at the same issues from different angles, with multiple illustrations and technical appendices). There is a summary page with links to the various documents and practical details [HERE](#).

We are very aware that many Twickenham residents – including us at RAG – have been waiting a long time for the derelict site on the Riverside to be dealt with and may now be impatient just to 'get it done'. But, that can produce the wrong outcome. We ask you not to be put off by the sheer quantity of pages, but to delve into those parts in which you have greatest interest and/or concern.

In this newsletter, we focus principally on the 'Planning Statement' which can be found [HERE](#). This document is itself long, but the sections on which we recommend you focus your attention are:-

- Section 5: 'The Proposed Development (pages 20-28);
- Section 7: 'Planning Consideration' (pages 31-55); and
- Section 9: 'Conclusions' (pages 57-58), largely repeating the above.

Those sections are important for us as residents – to take account of what the Council is proposing to build on the site.

### **Here are points in the Planning Statement we would like to highlight to you, before we offer our summary thoughts on behalf of RAG:-**

- The size and shape of the proposed new building on Water Lane (towards the north east of the site) and the proposed new building on Wharf Lane (on the south west corner of the site) are as previously proposed. The proposal is that they include 45 residential units in all – 21 affordable homes in the Water Lane building and 24 private tenure apartments in the Wharf Lane building.
- As for the Water Lane building. we reported in an earlier newsletter that a local architect who was formerly a member of the design panel has expressed his criticism of the proposed design, saying that in his view the look of the building was uninteresting – 'monolithic'. The Water Lane building will, however, serve to replace the existing derelict site, and, for that reason alone, residents may wish to support this part of the development.
- It is the Wharf Lane building which, we argue, is more problematic in the form it is proposed. In our newsletter of June we described our concern at its massing and height: nearly 19m and five storeys high from ground level at the top of Wharf Lane, and 2.5m higher when viewed from the front on the embankment because of the flood-wall plinth on which the building sits – a total of nearly 21.5 metres to be located close to the river. It is notable that these heights are only evident from a single line in the text and one of the technical drawings – unlike the height of the Water Lane building, which is openly acknowledged on all the relevant drawings. We have raised the size issue with Council officers and Councillors. Our

representations have, however, been ignored and now the Planning Statement just asserts, in relation to the scale of the Wharf Lane building, that:-

‘... [it] is considered appropriate’ with the design contributing to it ‘sitting comfortably in views from the river’.

In other places, the proposal argues that the Wharf Lane building reflects the riverine context, compared to the high-street context of King Street and that the design offers an intentional connectivity between the two. We point out that this is taller than anything on King Street and suggest you look at Figure 8 on page 23, ‘River facing frontage of the Wharf Lane building’, to see what you think of how it will look *from the river* (in the figure the building seems to be shown as if from a distance, instead of close to).

Meanwhile, what the buildings will look like from *downstream*, at York House Gardens, is supposed to be shown by the second of two photos in Figure 21 on page 51, but the photo is presented in such small format that it is well-nigh impossible for readers of the Planning Statement to decide for themselves whether the form of the proposed buildings will, as asserted by the Council, ‘fit well into the green setting of the river’ (page 51). As for the second part of the same sentence where it is said that the buildings will ‘respond positively to the hard edge of the Embankment’, we will leave you to decipher what that means (is it actually planning speak for ‘there will be a tall, bulky building set on a plinth in a manner that is over-bearing in relation to the Embankment?’).

- Another representation of ‘before and after’ is set out on pages 49 and 50, in Figure 19, the ‘Existing open space’ and Figure 20, the ‘Proposed open space’. This time the comparison is clear. There will be significantly less ‘softscape’ (green area) if the development goes ahead as the Council proposes: the ‘hardscape’ in Figure 20 – the paved areas - predominate. And there are a number of other questions over the true picture regarding the amount and nature of the promised open space.
- The proposal for a ‘public house/restaurant’ in the Wharf Lane building, at upper-embankment level facing the river, has been retained (section 5.11, on page 22). Is it to be a pub or a restaurant? If a pub, why - RAG has asked - is it thought necessary to add a new pub to those which *already exist*, in King Street, Church Lane and on the embankment? RAG has posed a question as to the new pub’s seating capacity and a possible outflow of customers sitting on the nearby steps leading down to the embankment. If the desire is *not* to create an open-air drinking zone on the steps, it would be better to licence the premises as a restaurant (seating only). This appears to be the primary additional public amenity represented by the western side of the development. Is this really what we want? It is far removed from the exciting space and public activity offered for this part of the development in the original competition-winning design.
- A potentially attractive feature of the Wharf Lane end of the site is a ‘riverside activity zone’ in the south-west corner of the building, with a ‘pontoon’ and ‘boathouses’ for paddle boards and kayaks. Questions were raised by members of the Stakeholder Reference Group (SRG) as to the practical organisation and management of that area. That sounds good on paper, but can this very pinched space really be made to work in practice for boating and other river-related leisure activities? How will a pontoon work with the gangway required to adjust to the different tide levels? Will it be behind a barrier? What will be the administrative burden, etc? These are important practical details that still have to be resolved.
- The Planning Statement notes (section 7.112 on page 52) that the ‘LBRuT Local Plan Policy LP45 (Parking Standards and Servicing) requires a new major development which has servicing needs to demonstrate it creates ... no material harm to the living conditions of *nearby residents*’. It is still not clear which vehicles will be allowed to use the Embankment. These seem to be mainly refuse vehicles and large articulated lorries, but which others? The Delivery and Servicing Plan (‘DSP’) for the development refers to service of the Water Lane building (section 7.112 on page 53) *without* any mention of the residents of Eel Pie Island nearby. But, as had been pointed out by SRG members, the boatyards/businesses on Eel Pie need to be adequately serviced, including by large delivery lorries. Will those vehicles need and have access along the Embankment at certain specific times (e.g. during weekdays) to facilitate that servicing? If so, will that be

organised so as to be compatible with the leisure use of that area by pedestrians and with the intended events space on the Embankment (which the Council calls the 'town square')?

- As noted above, , the prospect of removal of the derelict area (close to Water Lane) after so long is very welcome, as is the widening and configuration of Water Lane, but we ask the question again: is what is being proposed by the Council the best that can be done at the Wharf Lane part of the site? The original Hopkins design which won the design competition in November 2019 proposed the Wharf Lane building with a 'winter garden' which gave it a lighter look/feel. The fact of 'optimising the brownfield town centre site' at Water Lane (section 9.2, page 57) should not be used as a justification for over-building on another part of the site which includes existing open space.

Overall, our impression is that the effect of the Council's proposal will not create a development which fits with the particular characteristics of Twickenham riverside. The plan is to build lots of flats with some retail/office use on the ground floor, plus a café and a 'pub/restaurant', with many paved areas. That is what is *supposed* to 'create an exciting destination...' 'championing the river' – two of the features which are said, near the beginning of the document, to be 'core objectives' of the development (in section 1.5 on page 6,). In other words, in this and other respects the development scheme as proposed by the Council falls short of its own key planning aims.

Most of the good things that residents endorsed in the January consultation *can* be achieved and the bad things negated, while *avoiding* the worst elements of the Council's proposal. As we noted in the previous RAG newsletter, not only will we all be judging the development when it is first opened to the public, but every time we visit it in the following years. The chosen design will have to stand the test of time.

The Council is intent on pushing ahead and is aiming for a planning decision by end-November, so as to start construction in Spring 2022. **We residents should respond to the planning application by submitting comments and any reservations – each as individuals – if possible by the stated deadline of 17th September.**

As ever, we welcome your comments.

Best wishes,

The RAG team