

TWICKENHAM SWIMMING POOL PUBLIC INQUIRY

PINS Ref: APP/L5810/V/03/1128907 & 1128908

LPA Ref: 03/1141/FUL & 03/1142/CAC

Applicant: London Borough of Richmond upon Thames

Proposal: Demolition of pool building. Hard and soft landscaping of resultant footprint. Partial clearance of poolside lido to form park and children's play area secured by fencing. Steps from lower to upper area. Short term scheme pending future development envisaged 5 year duration.

CLOSING STATEMENT

of

Clive William WREN D Arch (Kingston) RIBA

CLIVE WREN Architect & Landscape Designer

The Courtyard, Evelyn Road

LONDON W4 5JL

T: +44 (0)20 8742 7944 F: +44 (0)20 8994 2902

e: CliveWren@aol.com

Summary of my case

1. The pool building has intrinsic merit and makes a positive contribution to the conservation area. Its refurbishment and re-use are feasible and viable and could trigger regeneration of the whole pool site and the adjoining area. Its demolition would harm conservation and Thames policy area objectives and could prejudice the satisfactory long-term redevelopment of the site as a whole. In view of the above, and in the absence of acceptable and detailed proposals for its replacement or for the redevelopment of the site as whole, conservation area consent to demolition should be refused.

2. The application proposals are contrary to several UDP and London Plan policies, particularly those concerned with preserving or enhancing the character or appearance of conservation areas and the character and use of the Thames Policy Area, and with conserving resources. Planning permission should be refused.

3. Hitherto demolition of the pool building has only been considered at a public inquiry as an adjunct to large redevelopment proposals. It is significant that the Secretary of State called-in the present application for conservation area consent. It provides an opportunity to examine in detail and afresh the issues involved.

The case for retaining the pool building

4. My evidence is that Twickenham Swimming Pool:

- (1) Was built and opened with civic pride some 70 years ago
- (2) Is a distinctive and handsome Art Deco building of local interest
- (3) Is one of only a few public buildings of its period alongside the upper reaches of the tidal Thames
- (4) Is one of a group of 20th century buildings next to the Thames in London which act as landmarks by reason of their symmetrical layout and dominant central feature
- (5) Relates to other Art Deco buildings in Twickenham Town Centre and to Thames Eyot immediately upstream, which is designated as a building of townscape merit and located in the conservation area
- (6) Is the only building of its period on The Embankment
- (7) As a major public building, sits at one end of The Embankment in juxtaposition with St Mary's Church at the other
- (8) Marked a historically significant change in land-use next to the river from private residential and commercial to public recreation and leisure

- (9) Was built at a time when lidos, promoting health, fitness and pleasure for the masses, were internationally fashionable, providing a valuable leisure facility and enabling more people than ever before to learn to swim
- (10) Is a rare representative of a quickly diminishing building type
- (11) Was socially and culturally important to the people of Twickenham
- (12) Was the most significant development on The Embankment during the 20th century
- (13) Possesses qualities of restrained grandeur, repose and vitality
- (14) Addresses the river as a frontage in a positive and appropriate way
- (15) Is a building of its time and place
- (16) Makes a positive contribution to the character and appearance of the conservation area by virtue of its architectural quality and distinction, its relationship to the river, and its historic association with public use of the riverside for leisure and recreation
- (17) Relates well to other buildings in the conservation area by virtue of its materials, window proportions, height and limited depth
- (18) Is robustly constructed and can be refurbished to meet present building standards
- (19) Would be significantly cheaper to refurbish than to build from new
- (20) Could accommodate beneficial public and river-related facilities
- (21) Could be re-used profitably
- (22) Has developer interest
- (23) If refurbished, would help regenerate the riverside, the remainder of the site and the surrounding area
- (24) If retained and other buildings cleared, would leave 56% of the site's frontage open to the river
- (25) If retained, would allow the provision of substantial areas of public open space on The Embankment and around the building, extending the river influence landwards
- (26) Is not required to be demolished in implementing UDP proposal T1
- (27) Would allow the rest of the site and/or adjoining land to be redeveloped in accordance with proposal T1
- (28) Represents a significant investment in resources, which would be squandered by its demolition.

5. Supporting evidence for retaining the pool building is:

- (1) English Heritage's Assessment dated 6 May 2003, which, whilst making clear that the building is not of comparable quality to listed lidos, recognises that the building's "location and art deco facade give it an appropriate joie de vivre" and that the facade is similar to the listed Tinside Pool in Plymouth.
- (2) The Ancient Monuments Society letter dated 8 January 2004, which says:

“Twickenham Swimming Pool is a building of some distinction, very typical of its 1930’s origins.....the frontage of the building still retains its dignity and seems eminently recoverable from its present semi-dereliction.....Although we would not contest the decision to deny the building listed status, it does have clear quality and deserves better than to be destroyed. Our concern at the threat of demolition is the greater for the fact that there seems no form long term plan for the constructive reuse of the site.”

- (3) Save Britain’s Heritage’s letter dated 12 January 2004, which says:

“This is a handsome building of local interest which forms part of the history of the area and is consequently of importance to the conservation area. It sits on an especially sensitive site, and its architects were clearly careful to ensure that the building addressed the river without seeking to create an overbearing attitude, retaining the low horizons of the flood plain. Consequently the building is grand without being overpowering, loosely classical in its form.

“The demolition of this building, being located in the conservation area, should be weighed up against the criteria contained within PPG15.....The benefit to the community of retaining this unobtrusive yet handsome building within the conservation area, and giving it a new life through its mixture of uses, some related to the river, is of course preferable to demolition.....It is our experience that buildings such as this are eminently capable of reuse, and once repaired and given a new life, they rapidly become a focus for the surrounding community. Demolition should not be an option for this building.”

- (4) The Twentieth Century Society’s letter dated 22 January 2004 which says:

“We feel that although the building is not of listable quality, it is nonetheless of architectural interest....We feel that the swimming pool with its well-structured facade and glazing is definitely an important asset to Twickenham’s townscape and especially the riverside.....It is also a rare representative of a quickly diminishing building type: The Lido.....Today only a handful still survive.....We therefore object to its demolition, particularly since there has been some interest in its rehabilitation and no replacement scheme is forthcoming.”

- (5) Andreas Sarhage’s letter of 21 January 2003 which says:

“I believe it is a beautiful period building with historical background, a sound structure and therefore very much worth keeping..... I also strongly believe that it would be possible to redevelop the building and site instead of unnecessarily employing the council's money for the demolition and the redevelopment of a new garden with additional costs of maintenance.”

(6) Andreas Sarhage's letter of 25 February 2004 which says:

“I am certain that a building in Germany such as the one at this site would be protected from demolition at the regional level of government.....If account is taken of the area of site occupied by the building.....and the cost of demolishing the building.....the Developers's Profit for (Dearle and Henderson's) Scheme 2 would be over 17%.”

(7) Howard Vie's statement on the first day of the inquiry in broad support of my case.

(8) 'Farewell My Lido' published by the Thirties Society (now The 20th Century Society) which confirms the historic importance of public lidos generally; that, although none was designed by an architect of note, many are wonderful buildings, which are increasingly enjoyed for their period character; that many more people, especially those from poorer backgrounds, learnt to swim; that lidos provided leisure for the masses enjoying for the first time the benefits of shorter working hours.

(9) Mr McKevitt's evidence (2.1.2-2.1.4) for the Council which acknowledges that Twickenham Pool was a significant facet of public life in Twickenham and became something of a social hub.

(10) Dearle and Henderson's reports, schemes and costings which confirm that the building is robustly constructed and that it can be refurbished to meet present building standards and the site landscaped at a cost significantly less than constructing a new building.

(11) Donaldsons' development appraisals which confirm that the building could earn significant revenue.

(12) The letter from Richmond and Twickenham Friends of the Earth dated 1 February 2004 stating that “The existing structures with their embodied energy should be retained rather than demolished.”

6. To summarise, there is a substantial body of opinion, much of it professional and recent, that explicitly supports my case for retaining the pool building.

The case against retaining the pool building

7. The pool building is in a state of semi-dereliction following many years of disuse and neglect and the repeated failure of redevelopment proposals. As Mr McKeivitt says, this may be a result of “unintentional consequences” rather than “deliberate neglect”. However the pool building’s state has been at the root of much of the adverse criticism and appears to have clouded some previous appraisals.

8. The Council’s case is that Twickenham Pool has very little or no architectural or historic interest, that it does not make a positive contribution to the conservation area, that the criteria in PPG15 for unlisted buildings do not apply, that even if they did, the building is unsuited to re-use, re-use would generate insufficient developer’s profit, and the building’s retention would prejudice redevelopment of the site. It relies on the following evidence:

(1) The failure of the 1998 Conservation Area Study to identify the building as making a positive contribution to the area. Instead the Study identifies the disused pool site as blighting the western end of the embankment and being an anticlimax compared to the rest of the area. This Study’s comments appear to be concerned with the state of the site rather than the intrinsic qualities of the building.

(2) The letter from English Heritage dated 11 December 2001 which states that:

“I do not wish to make any representations about the proposed demolition, since with the exception of the Swimming Pool the present buildings are of no distinction, and the retention and restoration of the Swimming Pool does not seem to be a viable proposition.....The derelict state of the riverside at Twickenham Embankment has been a disgrace for a long time, but reluctant though I am to say it, yet more time needs to be allocated to getting a development scheme that responds sympathetically to the extraordinarily special qualities of the location.”

It is at best surmise and at worst misleading for Dr Edis to conclude (at 4.2.1 of his proof) that on the basis of this letter, Twickenham Pool has no architectural or historic interest. Whilst English Heritage does not object to the proposed demolition of the Swimming Pool, it appears to have been influenced by the apparent lack of a viable use and the derelict state, not just of the building, but the surrounding area.

(3) The letter from English Heritage dated 23 June 2003 which states that:

“The existing building is clearly unused and subject to abuse and makes no particularly positive contribution to the character or appearance of the conservation area. We would, therefore, raise no objection to its demolition and replacement with a children’s play area and landscaped siting area, but would stress the importance of securing a long term future for the site”

It appears that English Heritage was again influenced by disuse and neglect of the building, and has, in effect, given up.

(4) English Heritage’s Assessment dated 6 May 2003 and recommendation that the building should not be listed. The conclusion to be drawn from this assessment is, as stated in the DCMS letter dated 4 June 2003, that the building “is not of sufficient special architectural or historic interest to merit listing.” It does not mean that the building is not of local interest. The UDP Inquiry inspector appears to conclude that it does, although he did not have the benefit of all the evidence before this inquiry.

(5) The failure of the gazetteer in ‘Farewell My Lido’ to list Twickenham Pool. Omission from a list of lidos that seems not to be based on merit is insignificant other than that the list is clearly incomplete.

(6) The 1991 Inquiry inspector’s comment (at 11.4) that “The developed part of the site is, on the face of it, undistinguished...” In that the pool building is neither eminent nor remarkable, this finding is consistent with English Heritage’s advice not to list. The inspector also found (at 11.39) that he saw “no prospect of re-use of the Baths nor benefit in the retention of the building”. My evidence indicates that this is not the case.

(7) A L Tamkin’s failure to mention the pool building in his application to become an FRIBA, indicating that he did not regard the building as one of his major works. The application was made 20 years after the Swimming Pool was opened and after 6 years service in the Royal Engineers. He may simply have forgotten Twickenham Swimming Pool, or he may have considered his later work more important and of greater relevance to the issues of the day e.g. food production. The presence of A L Tamkin at the opening of the pool and the similarity between the hand-written numbers and letters on the drawings and the handwriting on the FRIBA application form indicate that it was, in fact, he who designed the pool building.

(8) The Thames Landscape Strategy which states that:

“The derelict swimming baths building is out of scale with the rest of the waterfront and introduces a rather bleak dead end to the embankment...”

The pool building is different in scale from the finer grain domestic buildings of the village core to the east. However, old maps of the area (Dr Edis’s appendices 8, 9 and 11) show that Richmond House and Poulett Lodge were in marked contrast to the village core before the pool was built. Richmond House was a pavilion building surrounded by private grounds. The Swimming Pool is also a pavilion building but surrounded by public land (see Dr Edis’s appendix 12). This fact is no longer immediately apparent because vehicles rather than the pool building cram The Embankment and other buildings have been added to the side, masking the original layout. This evidence was not before the 1991 inquiry inspector or the UDP inquiry inspector when they commented on the scale of the pool building. It also seems not to have been appreciated by the authors of the Thames Landscape Strategy. The Strategy’s reference to “a rather bleak dead end” appears more to do with the “derelict” state of the building than its intrinsic qualities. Re-use of the building would overcome this impression.

9. The Council’s claim that Twickenham Pool has very little or no architectural or historic interest is based more on conjecture and comments related to the state of the building than on criticism of its intrinsic qualities. The only outright condemnation of the pool building came from Dr Edis in cross-examination - hardly an “overwhelming balance of professional opinion expressed over a number of years”.

10. The Council’s claim that the pool building is unsuited to reuse is belied by Dearle and Henderson’s schemes and costings and Donaldsons’ commercial appraisals. This evidence, prepared by the Council’s own consultants, indicates that a substantial revenue could be realised by refurbishing and reusing the pool building.

11. The Council’s claim that the Dearle and Henderson schemes would yield insufficient developer profit is belied by Mr Sarhage’s interest in refurbishing and reusing the building. His evidence indicates that an acceptable profit is achievable by reducing or writing off site acquisition costs.

12. Paragraph 3.19 (ii) of PPG15 states that in seeking alternative uses for a building, the unrestricted freehold should be offered on the open market at a realistic price reflecting the building’s condition. This has not been done. In any event, Paragraph 3.16 of PPG15 states that the Secretary of State would not expect consent to demolition to be given simply

because redevelopment is economically more attractive to the developer than repair or re-use of a historic building.

13. The Council has failed to satisfy the requirements of PPG15 by demonstrating that:
 - (1) The pool building does not make a positive contribution to the conservation area
 - (2) Its retention would prejudice development of the rest of the site
 - (3) Its refurbishment is unfeasible or unviable
 - (4) Suitable alternative uses cannot be found
 - (5) The merits of alternative proposals for the site significantly outweigh the merits of retaining and reusing the pool building.

14. Even if the pool building made little or no contribution to the character or appearance of the conservation area, there are no acceptable and detailed proposals for a replacement scheme as required at paragraph 4.27 of PPG15. Hope for the future is insufficient. PPG15 requires certainty. Conservation area consent to demolition should be refused.

The case against the proposals

15. The proposals are inadequate in the following respects:
 - (1) The proposed fence would be an unattractive and dominant feature. It would have no architectural or historic interest. Retaining the building would remove the need for the fence. Its replacement for the pool building would be harmful to the character and appearance of the conservation area and the character of the Thames Policy Area contrary to UDP policies STG2, ENV26 and BLT2 and London Plan policies 4C.10 and 4C.20
 - (2) The proposed play area is unrelated to the river with views out blocked by the fence. The seats at embankment level would enjoy worse views than those already available along The Embankment. The proposed uses therefore fail adequately to establish a relationship with the river, to take advantage of their riverside location, or to address the river as a frontage, contrary to UDP policy ENV26(d) and London Plan policies 4C.12, 4C.16, 4C.18 and 4C.20.
 - (3) Demolition of the pool building would destroy the possibility of adapting it to accommodate leisure uses for the community and facilities enabling the public enjoy the river and riverside, with no certainty of new facilities being provided, contrary to

UDP policies ENV26(f) & (l), ENV28 and ENV30, and London Plan policies 4C.12, 4C.13, 4C.16, 4C.18 and 4C.20.

- (4) As a building possessing some architectural and historic interest and making a positive contribution to the conservation area, its demolition would be contrary to UDP policies STG2 and BLT2 and London Plan policy 4C.10.
- (5) The proposals occupy only a small part of the site and would be unlikely to trigger regeneration of the surrounding area. Being remote from other amenities and centres of activity on the riverside, the proposals are liable to attract criminal activity contrary to UDP policy BLT17.

16. The proposal are clearly contrary to several UDP and London Plan policies, particularly those concerned with protecting or enhancing the historic environment and the character and use of the Thames Policy Area. Planning permission should be refused accordingly.

17. This statement is not comprehensive and should be read in conjunction with my main Proof of Evidence and Summary Proof of Evidence.