
APP/L5810/V/03/11128908 & APP/L5810/V/03/11128907

LBRuT Twickenham Swimming Bath Site

Proof of Evidence

by

Twickenham Society Group (TSG)

consisting of

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12 January, 2004

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INTRODUCTION

The Twickenham Society Group (TSG) consists of local societies and associations which represent local residents, special interest groups and local residents with especial interest in the Twickenham Embankment.

Over the last 23 years our members have worked with the Council of the day to assist the development of a coherent strategy for the replacement of the old Twickenham Pool, closed down in 1980. On occasion, we have helped focus opposition to proposed schemes of too large a scale and with inappropriate use. Two of the schemes opposed were called in by the Secretary of State, and we were responsible for collating and coordinating the views of local groups at the subsequent Inquiries.

The most recent of these, the Inquiry into the Dawnay Day scheme 2002, did not run its course. At the elections in May 2002 a new Council was elected. Soon afterwards, it withdrew from negotiations with Dawnay Day and speedily set about devising a new strategy for the development of the site.

We were one of the groups invited to contribute our views and this resulted in the submission of a discussion paper, *Rethink on the Riverside* ([Ref 5](#)) and subsequent discussions with Tom McKeivitt, the officer who led the review on behalf of the Council.

By Feb 2003, a new strategy for development of the site and a plan for its implementation had been agreed by the Council ([Refs 6 & 7](#)):

- At a Cabinet meeting on 10 December 2002, the Council made the decision to adopt what is essentially Recommendation 2 in the Chief Executive's 55-page report for the meeting. The fundamental parameters for the development would be those set by the relevant UDP and other planning policies. It was further decided that there would be commercial enabling development to pay for land clearance and landscaping, and that the potential/necessity for the implementation of further aspects of UDP policy T1 would be considered.
- It was decided, too, that, while details of the development were being worked out, a temporary scheme would be put in place designed to relieve the visual blight of the old pool changing room building which had been derelict for many years. This is Option B identified in section 4.25 of Tom McKeivitt's report, and in accordance with section 3.6 of the same report a detailed design for the short term scheme would follow.

On 27th March 2003, we organised a public meeting to discuss the Council's proposals, with Tom McKeivitt as the main speaker, and the person who answered the questions. The background papers handed out at that meeting provide a concise summary of the Council's intentions for the site ([Refs 8 & 9](#)). The meeting was structured to provide feedback on a number of specific points, but views were also sought on the overall approach.

There was strong support for the long-term strategy proposed by the Council, but only a small majority was for the short-term scheme that is the first step in the implementation of the strategy, and which is the subject of this Inquiry. Those opposed to the short-term scheme fell into three camps:

1. broadly in favour, but felt it could be improved,
2. wanted to know more about the plans for the long-term scheme before making a decision
3. totally opposed because of the demolition of the pool buildings.

It is our view that the majority of our members favour the temporary scheme that is proposed and wish it to go ahead. Our members are keen to lift the blight of the unsightly old changing room building as soon as possible and have confidence in the knowledge that long-overdue progress is being made with this site. We believe, however, that further modifications could and should be made, and suggest that conditions covering all agreed modifications should be attached to any approval.

The justification for this position is given below, set in the context of the three issues that caused the Secretary of State to call in the Application.

1. Whether the proposed development would prejudice proposals for the redevelopment of the former Swimming Pool site as a whole

We recognise that the proposed development is intended to be temporary. That leaves unresolved decisions about the final development of the site as a whole. Thus, it is necessary to examine the Council's long-term intentions.

Two sets of issues arise:

- **Strategic.** Does the Council have a clear and satisfactory strategic plan? If so, will it be able to implement it? Can the default position be made acceptable, in the event that long-term plans have to be abandoned?
- **Practical.** The classic practical problems encountered with "temporary" "interim" or "short-term", schemes for long-blighted sites arise from the funding arrangements and the introduction of inappropriate usage ([Refs 10-12](#)). The funds made available are typically too small to provide a really good temporary scheme or so large that they prejudice a satisfactory long-term scheme. Inappropriate usage may prove difficult to dislodge and this too will prejudice the long-term scheme. Design options of a short-term scheme, e.g. location of uses, and introduction of buildings, may persist in the long-term scheme to its detriment.

These issues are explored below.

1.1 THE COUNCIL'S STRATEGY AND PLANS FOR IMPLEMENTATION

1.1.1 Long-term

As part of the process initiated by the new Council in the Summer of 2002, TSG reviewed the reasons for past failures and explored the options for future long-term development of the site in the discussion paper, *Rethink on the Riverside* ([Ref 5](#)). They concluded:

The basic choice is between:

1. A low-scale, river-related scheme with modest funding requirement
- or
2. A modest development around a public facility, such as a river museum, funded by an individual donor or charitable organisation.

The advantages claimed for a low-scale, river-related scheme are:

- It can be done immediately
- There is a range of funding options
- The site remains available for future development and land value is maintained
- A well-designed scheme will attract families and visitors to the riverside. Their spend within the town centre will help revitalise the town centre
- Contentious traffic and parking problems are minimal compared with a large scheme
- Security problems may arise but are manageable
- A modest river-related scheme is the first choice of many people within the Borough

The advantages of a modest development around a sponsored public facility are:

- The public facility provided would be more substantial than open space
- Sponsorship will result in reduction of the need for enabling development, and hence keep the whole development on a modest scale, in the spirit of the 1991 Inspector's report

The strategy of the Council has been developed through a series of papers to and in the resolutions of Cabinet ([Refs 6 & 7](#)). A convenient summary is provided in the background papers presented to the public meeting of 27th March 2003 ([Refs 8 & 9](#)).

The strategy adopted by the Council appears to be consistent with the thinking of TSG in that:

- The long term aims, as we understand them to be, are appropriate
- There is a commitment to a significant public asset, and a "Twickenham Challenge" is underway to establish whether it is possible to get substantial sponsorship for a satisfactory public facility
- When the outcome of the Challenge is known, plans for the full development of the site will be prepared
- Meanwhile, a start will be made by development of a partial open-space scheme

In TSG's view this is a win-win approach, leading to one or other of the outcomes recommended in *Rethink on the Riverside* ([Ref 5](#)). If it succeeds, the outcome will be modest development, option (2) above, and if it fails it will leave the low-scale option (1).

1.1.2 Short to Medium Term

After 23 years of blight, a good temporary scheme would be widely welcomed in Twickenham. Over the years, there has been significant and growing support for an open-space scheme, and this has been recognised in the various proposals, and many statements made by new Councillors and their leader. If that were all that this Council were able to achieve, many would consider it a distinct and satisfactory improvement on what is on the site at present.

Although the Council's intent and resolution is not in doubt, it may be beyond its powers to bring forward an acceptable long-term scheme within the lifetime of the current administration. There are many examples of "temporary" schemes having very long lifetimes.

The next step in the implementation of the Council's strategy is to identify suitable candidates and concepts for the public facility, prior to putting them out for public consultation. This process is under way.

The "Twickenham Challenge" is, in principle, a good initiative, and it may result in the identification of a good public facility that can be incorporated within the long-term scheme without forcing the enabling development to breach the guidelines of the 1991 Inspector's report. But it may not.

It is impossible for us to make any informed comment upon the influence of the "Twickenham Challenge" on either the temporary or the long-term scheme, because we have no detailed knowledge of the Challenge. Since the selection of a short-list of candidates was announced in March 2003, all discussions of the "Twickenham Challenge" have been conducted under terms of commercial secrecy. To avoid conflict of interest, members of The Environment Trust of Richmond upon Thames, who are associated with one of the bids, have withdrawn from meetings of TSG.

1.1.3 Reservations

We have followed the development of the new Council's thinking on the Twickenham Pool site closely, and believe it is correctly summarised in [Refs 8 & 9](#). On this basis, we have supported it and continue to do so.

However there are a few indicators that all may not be as we think. These are:

- **Lack of clarity.** The Council's strategy is not summarised concisely in any Cabinet paper of which we are aware. Councillors have made public statements that betray lack of understanding of the reports presented to and of resolutions adopted by Cabinet. Election promises have been presented, incorrectly, as Council policy. In Dec 2002, as the cabinet was deciding its policy, the local Conservative Party newsletter stated that the Terrace Group scheme was to be adopted, in the first instance. There is a widespread public impression that the whole site is to be cleared.

Clarity is essential, especially as neither a conceptual plan nor a *Revised version of the Brief to the Developer* have been published.

- **Compliance with the principles of the 1991 Inspector's report.** We have accepted the Council's stated commitment to the principles laid down in the 1991 Inspector's report, so we were very surprised by the changes to the UDP that have been proposed by the Council. In total, they amount to a significant departure from the Inspector's guidelines. Further, the vigour with which the Council supported those changes to the Inspector at the recent UDP Inquiry indicates the Council is committed to a much larger development than was proposed in what we understand to be their strategy.
- **Quality of design.** The choice of a design by a company which is noted for its skills in advising Councils on public-private finance initiatives, and have acted as quantity surveyors, for the Council's "riverside" project team is curious. In the past distinguished architects have advised the Council about the best way to manage the development of the site. Given

that the multi-phased strategy that has been adopted raises serious design issues, the absence of good architectural advice is a worry.

This Inquiry will be able to establish whether such concerns are real or illusory.

1.2 LIKELY IMPACT OF THIS PARTICULAR SCHEME ON FUTURE DEVELOPMENT OF THE SITE

1.2.1 Is this scheme a blocker ?

Another strategic issue is the effect that a temporary scheme will have on future development of the site. In the context of this Inquiry the relevant questions are:

Will the proposed scheme block future proposals? If so, does it matter?

To put the issues in context, we briefly describe several ideas for the low-scale development of the site and compare their potential for blocking future development.

1.2.2 Proposals for "open-space" schemes

During the prolonged discussion of the Alsop-Zogolovitch and Dawnay Day proposals, there were many calls for an open-space option. Surprisingly, the (then) Council never seriously considered such a proposal, preferring to dismiss it as "grassing over" or "creating a dog patch". The report of the River Use Working Party ([Ref 13](#)), pointed out the benefits of having public open space that could be used for a variety of activities and which made an appropriate link with the river. But it was left to a local architect, Ken Hathaway, to put forward and apply for planning permission for an open-space scheme. As an alternative to the Dawnay Day scheme, it received a lot of public support.

Since the abandonment of the Dawnay Day scheme, additional open-space schemes have been put forward, all of which are improvements on the current, blighted situation. Each involves partial or complete demolition of the buildings on the site. They are:

- The Twickenham Riverside Terrace Garden (TRTG) Group's scheme, in which most of the pool buildings were to be retained and reused. The original proposal, the one that has planning approval, was put forward by Ken Hathaway.
- The Twickenham Society Group's Waterfront scheme, by which the whole site was to be opened up and traffic re-routed away from the Embankment ([Ref 14](#)).
- Cllr Arbour, before and after the election in May 2002, strongly advocated the creation of Jubilee Gardens. No plans were presented, but the proposal is for clearance of the whole site, followed by landscaping and planting.
- The LBRuT/ Dearle Henderson scheme for partial clearance of the site and inclusion of a playground. This is the subject of this Inquiry.

What follows is a brief comparison of the schemes, in terms of relative benefit and blocking potential.

	TRTG (Hathaway) Terrace Garden	Cllr Arbour Jubilee Gardens	TSG Twickenham Waterfront	LBRuT/Dearle Henderson Proposal
Benefit	Uses existing buildings. Facade of the old pool modified. Variety of uses spread over the whole site.	Clears site. Good use of public open space.	Transforms the site. Removes traffic from Embankment. Integrates the open space of pool site with riverside. Can be developed further.	Partially clears site. Playground good use.
Disadvantage	Retains unsightly buildings. Poor quality.			Retains unsightly buildings. Poor quality.
Blockers				
Physical	None	None	Enabling development and re-routing of traffic constrain design options.	None
Persistence of use	None	None	Enabling development.	Playground in wrong place.
Financial	Not clear.		None. It's pay as you go.	None. Cost to be met from capital funds.

1.2.3 Blocking potential of the various schemes

The blocking potential for these schemes is low, whichever of the three main blocking mechanisms is taken into account:

- a. **Physical** - Do buildings within the scheme place unreasonable constraints on future development?

The physical blocking of the Twickenham Waterfront scheme arises because it is deliberately conceived as the first stage of a two-part scheme where the second stage is clearly indicated. Enabling development, needed to fund the clearance of the site, will remain in place whilst the rest of site is developed at a later date.

In the LBRuT/ Dearle Henderson (the Council's) scheme, the siting of the playground area is inappropriate, and there is a perceived danger that this will persist in the long-term scheme, effectively blocking desirable future options. Thus, the positioning of the playground needs to be addressed now, and this is discussed in the next section.

- b. **Financial** - Will funds spent on the temporary scheme have an adverse effect on the long-term scheme?

The Twickenham Waterfront scheme is not a financial blocker.

The knock-on financial effects arising from the LBRuT/ Dearle Henderson scheme are dependent upon Council policy. There could be a significant impact on any long-term scheme if the cost of the current proposal and the accumulated costs of the Dawnay Day scheme were to be reclaimed from the future development. However, the Council has decided that the cost of the proposed scheme is to be found from capital resources and that it will not be set against future development.

Whilst the policy with respect to the future may allay concerns, there are clear indications that lack of funds has constrained the design of the temporary scheme. It has always been agreed that any proposals should be to a very high standard.

- c. **Usage** - Will inappropriate usage persist in future development?

In all of the schemes, the proposed uses are low-key and likely to be popular, so it is likely that their loss would be seen by local people to be unacceptable. It should be straightforward to ensure that any successful uses are incorporated into the brief for the long-term proposals.

1.3 SUMMARY

- a. To the best of our understanding, the Council has developed an appropriate long-term strategy. However, there is not an easily accessible, succinct summary of it available, and there is limited public awareness of future plans for the site.
- b. It is unreasonable to insist, at this stage, on the production of a detailed long-term scheme. That will arise from a new brief to the developer, which can only be finalised when the outcome of the “Twickenham Challenge” is clear.
- c. We would welcome any good proposal that removed some of the blight that has affected this site for nearly a quarter of a century, subject to certain key provisos. We commend the Council for trying to find temporary uses that would help to redress the balance. This is particularly true in the light of the failure of yet another major scheme aimed at solving the long term uses of the site as a whole.
- d. The proposed development would prejudice any alternative scheme that includes retention of all or part of the existing pool buildings. The proposed development would not necessarily prejudice any scheme that includes the demolition of the existing buildings.
- e. TSG believes that best use of the site will ultimately involve demolition of the existing buildings and sees no reason why the process of demolition should not start now.

2. The relationship of the proposal to government policy advice in PPG15 and in particular whether the proposal would preserve or enhance the character or appearance of the Conservation Area and whether demolition should be permitted in the absence of acceptable and detailed proposals for redevelopment of the site as a whole

The Council prefers to use the term "short-term" to describe its own scheme, and states a maximum period of five years for its duration. By then, it is confident that it will have its long-term scheme under way or in place.

We note that the timescale is beyond the lifetime of the current Council and that no administration is fully in control of the long-term. Despite its good intentions, it may, however, be beyond the Council's powers to bring forward an acceptable long-term scheme within the lifetime of the current administration.

There also may be a tacit assumption that lower standards are permissible for a "short-term" scheme.

We think it is more prudent to adopt the view that any "short-term" scheme carries with it an element of wishfulness and that any scheme must be judged on its present merits.

Hence, the temporary scheme must conform with the high standards of a conservation area and a prime riverside site.

It is relevant to consider the consequences of the Council's "short-term" scheme persisting beyond the anticipated five years.

2.1 CONSERVATION AREA ISSUES

2.1.1 Appearance

The existing pool building has some intrinsic architectural character and merit but this is not sufficient to warrant protection and redevelopment. We therefore do not object to the proposed removal of the Pool building providing its removal can be afforded without detriment to the long-term development of the site as a whole.

The existing pool building prevents views of the river from most of the site. The scale and mass of the building is not sympathetic to pedestrian enjoyment of the Embankment and riverside.

The removal of the Pool building would open up views of the river from those areas of the site that the Council proposes to bring into temporary use. This would be of benefit to all those using or visiting those areas. The removal of the blighted buildings would enhance the affected parts of the site.

Blighted buildings have a destructive impact on environment.

2.1.2 Relation to the riverside

The Thames Landscape Strategy has several objectives for the Twickenham Riverside. It wishes to support the unique working riverfront, to encourage active use of the river and to make the Embankment more pleasant for pedestrians.

The Mayor of London's Blue Riband proposals also emphasise the need for passive and active use of the river and riverside.

The Council's scheme does nothing to advance any of these objectives. But equally, it does nothing to prevent their implementation in a future long-term scheme. The Hathaway scheme has similar limitations, and that was judged acceptable within the planning guidelines.

It does seem perverse to preserve in its present state, the best-positioned corner of the site, where the now closed public toilets are located, in the prime position in relation to the river. This matter can be redressed (see below).

2.1.3 Long-term Issues

This scheme must be viewed as a possible long-term scheme for the site. As such, it is not acceptable. Two thirds of the site are to be made secure, the least attractive corner of the site is to be developed, and the best positioned corner is to be left as a tempting prey to developers. The Council's modest proposal surely falls well short of the planning guidelines for the site ([Refs 16 & 17](#)).

A low scale development with a lot of public open space is a realistic option for the site, and the proposed changes to the UDP threaten this. Relatively modest and low-cost modifications to the proposals could result in a much more desirable scheme with a greater life-time, such as:

a. **Secure the Water Lane/Embankment corner of the site for public use.**

This is the part of the site to which the public naturally gravitate. It is closest to the draw dock (terraces) that attract the water birds, and therefore children, and which opens up some of the best views from the site, upstream and downstream. Two ways in which this corner could be better used are:

- i. To use it as a viewing platform. Relocate the public toilets so that they are more accessible from the town centre.
- ii. To "flip" the plan over, left to right, so that the children's play area is in a better position and has easy access to the part of the river that is safe for families to approach.

The objections to this are that the gradients make it difficult for pram access and that a local charity, HANDS, will have to be moved. These are not convincing reasons. Architects can always find a way of dealing with gradient problems. We all support HANDS, and, in the short term, they could be re-housed either in a building created at the Wharf Lane end of the site, or in the adjacent bath-site building that housed the playgroup. Alternatively, the Council could now assist them to make their inevitable long-term move from the site.

b. The removal of the toilets.

The "thunderbox" replacements that have been suggested are extremely unpopular with most users. Increased use of the Embankment for leisure purposes needs to be supported by good toilet facilities.

A further problem has become very apparent since the existing toilets have been closed. The centre of Twickenham is frequently crowded with rugby supporters, full of beer and in need of relief. They get to the toilets, find them locked, and then feel forced to use the bushes outside. Not an edifying sight.

It may be right to move the toilets, but the eventual facility should be fully equivalent or better, in terms of size, space and supporting facilities. The existing toilets, until closed, were quite spacious and functioned as changing rooms for participants in sporting events that originated or finished on the Embankment, e.g., runs, cycling, events, dragon boat races, etc, plus baby-changing facilities.

Cabinet approval has recently been given to the principle of applying for separate planning permission for toilets.

2.2 DESIRABLE ENHANCEMENTS TO THE APPEARANCE OF THE SCHEME

2.2.1 Make more use of the rest of the site.

Over the last few years numerous suggestions have been made for the use of the old pool, such as a skate-board park, a Jubilee Garden or a venue for a year-round program of outside events. Others might include: markets, an ice-cream and coffee bar, a flower stall, a water feature, sculptures or an open-air theatre. All are low-cost options that would greatly add to public enjoyment of the area.

2.2.2 Do away with the netting

The high steel mesh fencing proposed for the play area is quite out of keeping with the riverside and the conservation area ([Ref 15](#)). There are also concerns that plans to cover the mesh with climbing plants, thus creating screens, will diminish rather than increase security of users to the area.

2.3 SUMMARY

- a. We welcome the council's proposals provided that they are able to satisfy our concerns and requirements as set out above.
- b. Para 4.20 of PPG15, as it has been clearly interpreted at many inquiries, defines "preserve or enhance" as meaning that the proposal should leave the area's character or appearance unharmed. We believe that the Council's short term scheme meets this standard by removing redundant blighted buildings and structures. However, a higher quality of design will be essential to achieve enhancement.
- c. The proposed scheme may not be in breach of planning guidelines, but it does not significantly reinforce the Thames Landscape Strategy.
- d. We think the scheme could be better, and recommend that the approval is conditional upon the following:
 - i. Secure the Water Lane/Embankment corner of the site for public use either as open space or the children's playground
 - ii. Make appropriate provision for public toilets
 - iii. Use safety barriers that are more appropriate for a conservation area than high netting

- iv. Make use of the whole site

3. The relationship of the proposed development to policies in the UDP and the emerging UDP

3.1 CURRENT UDP

The first low-scale scheme to be submitted for planning approval was the Hathaway scheme. The Officer's report ([Ref 18](#)) was comprehensive, incisive and clear. The Planning Committee voted unanimously for approval, and the decision was upheld by GOL.

The reasoning applied then remains sound and is applicable to the present proposal. In both cases, the development falls short of the full requirement of the UDP in respect of usage and vehicular management, but it is deemed to be acceptable because blight is removed and future development of the site is not impaired. On balance, the immediate gain is worth having.

3.2 EMERGING UDP

We are anxious that the long-term scheme should not be prejudiced by weakening the current UDP policy, as proposed in the Council's 2003 draft.

The Council's 2003 draft removes a number of key words from the existing UDP in respect of scale and harmony, river and riverside use, and improved pedestrian use of the Embankment. If their revisions were adopted, we fear they would be construed by a would-be developer as encouragement for a large-scale, town centre development.

Our views were put to the Inspector of the UDP Inquiry, and we await his recommendations ([Refs 19-23](#)). It may be helpful for this Inquiry to summarise our major concerns.

3.3 KEY COMPONENTS OF THE UDP

3.3.1 Keeping to the planning guidelines of the 1991 Inspector's report

There has been lengthy debate around the question as to whether it is possible to create a development that complies with the guidelines of the 1991 Inspector's report whilst providing a reasonable return for the Council and the developer.

TSG worked closely with senior Officers of the Council during 1999/2000 to explore ways in which the planning and commercial objectives could be achieved.

Two of our members met with Donaldsons, who advise the Council on the financial viability of schemes for the site, to explore a number of basic options for development. The details of the calculations remain confidential, but the conclusion was quite clear, and the reasons for it amount to commonsense.

It is possible to meet the twin objectives, but some constraint is required. The major factors that need to be taken into account are:

- Going underground is expensive, especially in a flood area, and can only be recovered by excessive enabling development

- A modest enabling development will give a satisfactory return to the Council if only a modest public benefit is sought
- The cost of a "breakthrough" from King Street is high: two shops have to be purchased, and the developer may be faced with a "ransom" price.

The financial modelling demonstrated that several types of scheme might well be achieved under the "1991 rules".

The Council went on to prepare a revised brief for the developer in which the 1991 guidelines were emphasised and requirements for a public open space at the Water Lane/Embankment corner and a public-asset building were included. The feasibility of the brief was confirmed by asking a local architect to propose two schemes that complied with the brief and were deemed by Donaldsons to be viable. The proposed schemes avoided excavation, which kept the cost down.

TSG recognises that it was challenging for the developer to design to the brief and has urged the adoption of different approaches that will lead to improved financial viability (*Rethink on the Riverside* - [Ref 5](#)):

- Accept a reduced scale of benefit by having well-designed public open space as the main public asset. This could include a children's playground and/or a garden.
- Gain sponsorship of the public facility, thus reducing the level of enabling development required
- Forego the breakthrough from King Street

It was not a surprise that the Dawnay Day scheme, with its considerable excavations was excessive in scale, and inappropriate for a riverside site. The lesson to be drawn from its failure is to try a different approach. We see no need to change the UDP and the T1 brief to accommodate a new "Dawnay Day" type of scheme.

The new Council, through the development of their strategy, appeared to be drawing similar conclusions. In that case, it is a mystery as to why they should be seeking to modify the UDP by weakening the constraints on the scale and nature of buildings on the site.

3.3.2 The old pool occupies a riverside site

There have been proposals in the past that treat the site as an extension of the town centre, with the river effectively being disregarded other than as something to view from a restaurant, bar or executive housing. This is quite contrary to the spirit of the 1991 Inspector's report. We have argued ([Ref 5](#)) that the site is a buffer zone between the river and the town centre, and that it must support diverse river-related activities.

TSG are very disturbed by the submissions made by the Council to the UDP Inquiry in order to justify changes to the UDP in respect of river use. The Council proposed to remove the emphasis on a pontoon, but adamantly refused to accept our suggestion that this be replaced with a commitment to active river-related activities as well as passive viewing. Their proof of evidence contained serious errors of fact and some misrepresentations ([Refs 21 & 22](#)), and counsel, on their behalf, tried strenuously to argue that neither the Thames Landscape Strategy nor the Mayor of London's proposals encouraged active river-related activities! Instead of an amicable agreement on rephrasing of the draft UDP, we had to write a supplementary submission to the Inspector ([Ref 24](#)). In addition, we have made a formal complaint to the Chief Executive of LBRuT about the conduct of the Council.

We were taken aback by the attack on river-related activities because the Leader of the Council, Cllr Arbour, strongly supports the Thames Landscape Strategy, which has numerous policies relating to the Twickenham Embankment (LC1, 5, 6, 18 & 20 and RL 1, 3 & 18). He has publicly stated his commitment to a solution for the site that accords well with the Thames Landscape Strategy.

3.3.3 Specific or generic

We recognised the sense of removing a commitment to a specific river-related activity, because there are recognised practical difficulties with the provision of a pontoon. It is possible, but there are severe constraints on its siting, dimensions and access ([Ref 13](#)). The alternative phrasing we proposed was more generic. It retained the option of a pontoon, but encouraged alternatives to be explored ([Refs 19, 20 & 24](#)).

The Council also reacted adversely to our proposal for a more generic re-phrasing of their draft in respect of traffic management, which would permit alternative solutions to a hitherto intractable problem to be explored ([Ref 14](#) & [Ref 23](#)). In our view, a strategic document, such as the UDP, should be phrased to allow creativity to flourish within defined boundaries. The Council's insistence on specific proposals for the UDP has prompted the thought that their proposed changes to the UDP are to endorse a revised T! brief that has been prepared but not published. Cart and horse come to mind.

We await to see what the Inspector of the UDP Inquiry concludes, but for the purposes of this Inquiry, we hope the existing UDP will be taken as the relevant document.

CONCLUSION

The 1991 Inspector's report para 11.39 states

".....it is better to take a long-term view, making temporary steps for temporary uses which do not preclude a satisfactory form of development at some future time"

We concur with this view. We note also that, in the context of the report, there is an implied additional condition, that any scheme should be fully worthy of the site.

The proposed scheme is not ideal, but we prefer it to what we have at present. We support approval of the proposal but wish for the following conditions to be attached to it:

1. Secure the Water Lane/Embankment corner of the site for public use either as open space or children's playground
2. Make appropriate provision for public toilets
3. Use safety barriers that are more appropriate for a conservation area than high netting
4. Make use of the whole site

SUPPORTING DOCUMENTS

During the Inquiry we may wish to refer, in whole or in part, to some or all of the documents tabulated below, and others whose relevance becomes apparent during the course of the Inquiry.

We also draw attention to the rich resources provided by www.rivercentre.org.uk and www.twickenham-online.co.uk. The former has been established by TSG to provide background history of the site and to document key reports issued by the Council, plus reports, letters and other relevant material. Twickenham Online is an excellent community newspaper, and has many articles on proposals for the pool site, documentation and letters, all of which are archived. Easy access is obtained via the home page/Twickenham Journal/Archives.

A unique view of the site in its riverside context is provided by To the River www.totheriver.co.uk through the link to www.totheriver.co.uk/EelPie

This is the outcome of work commissioned by the Mayor of Richmond as a Millennium project. The whole of the riverside area has been photographed and arranged as a moving panorama, and explanatory notes are provided.

Many of the documents listed below are stored in electronic archives that are accessible to the public, and for these the archive reference is given.

Ref	Document	Public domain	TSG	LBRuT
1	www.rivercentre.org.uk	✓		
2	www.twickenham-online.co.uk	✓		
3	Inspector's report of the 1991 Inquiry into the application by Marks & Spencer	✓		
4	Thames Landscape Strategy	✓		
5	Twickenham Society Group discussion paper: Rethink on the Riverside (04/09/02) www.rivercentre.org.uk/rethink.htm		www	
6	Cabinet report & minutes (for general overview) (10/12/02) http://cabinet.richmond.gov.uk/ieListDocuments.asp?CommitteeId=163&CF=Cabinet&MeetingId=703&DF=10/12/2002&Ver=4#ai3557			www
7	Cabinet report & minutes, setting out strategic intentions (25/02/03) http://cabinet.richmond.gov.uk/Published/C00000163/M00000792/AI00003764/\$CAB250203item19TwickenhamRiverside.doc.pdf			www
8	T McKeivitt, Notes for a public meeting (27/03/03) http://www.rivercentre.org.uk/mck.htm			www
9	TSG Notes for a public meeting and public response http://www.rivercentre.org.uk/tsg25mar.htm and http://www.rivercentre.org.uk/tsg27mar.htm (27/03/03)		www	

10	"Planning for People: Essays on the Social Context of Planning", Maurice Broady; The Bedford Square Press, 1968	✓		
11	"Fight Blight", Charles McKean	✓		
12	"Indignation: The campaign for conservation", Mavis Batey, David Lambert and Kim Wilkie; Kit-Cat Books, 2000	✓		
13	Report of the River Use Working Party (28/10/99) http://www.rivercentre.org.uk/riveruse_report/rivrep.pdf	www		
14	Twickenham Waterfront scheme: conceptual diagram and supporting notes	✓	✓	
15	Yvonne Hewett, Thames Eyot Residents, Presentation to the Planning Committee (31/07/03)		✓	
16	Submission of EPIA to Planning Dept re Council's Short-term scheme (16/05/03)		✓	
17	Submission of York House Society to Planning Dept re Council's Short-term scheme		✓	
18	Officer's report on the Hathaway planning application (19/07/01) http://www.twickenhamriver.org.uk/pparkrpt.pdf			www
19	Submissions of EPIA to UDP Inquiry (03/06/03)		✓	
20	Proof of evidence EPIA to UDP Inquiry (03/09/03)		✓	
21	LBRuT Proof of Evidence; comments on EPIA proof			✓
22	EPIA response to Council's comments (16/10/03)		✓	
23	The report of the Traffic & Parking Working Party (Accessible via www.rivercentre.org.uk/trafrep.htm)	www		
24	Closing submission EPIA to Inspector (10/11/03)		✓	
25	Draft London Plan, Mayor of London, 2002	✓		
26	RPG 3B/9B Strategic planning guidance for the River Thames (1997)	✓		
27	"Arcadian Thames", M Batey, H Buttery, D Lambert & K Wilkie; Barn Elms Publishing, ISBN 1-899531-07-6	✓		