

LA Ref. APPLICATIONS; 03/1141/FUL and 03/1142/CAC

PI Ref. APP/L5810/V/03/1128908 and APP/L5810/V/03/1128907

#### Statement of Case

by Twickenham Riverside Terrace Group, hereinafter named TRTG, under Rule 6 of the Town and Country Planning Rules 2000

#### Summary of Objections

The TRTG's dispute with the Council is summarised below under appropriate headings, and structured to follow the Secretary of State's Rule 6 Statement.

1. The TRTG will argue and where appropriate demonstrate the following points: -
  - (i) The Council's proposals are prejudicial to and inconsistent with the Conservation Area on the grounds of: -
    - (a) General design of the scheme, and the layout, height and materials of the fences proposed.
    - (b) The majority of the site will be left unimproved for at least another 5 years; see Councils own programme (Cabinet Report 11 November 2003), without even the educational advantages proposed as part of the TRTG Updated Proposals May and August 2002, containing Bio Diversity Option, presented to Council 2002. Ref.: C and B
    - (c) The limited scope and the long period without improvement to the service road and Water Lane end of the T1 Brief site will perpetuate blight in the area.
  - (ii) The Council's proposals are contrary to PPG15 because: -
    - (a) The scheme does not form part of a sufficiently well defined long term plan providing a reasonable level of certainty as to the extent of public access and use or setting an acceptable ultimate level of development on the site in the form of mass, scale, floor space or basic urban design criteria
    - (b) The existing UDP and T1 Brief provisions for the site are widely accepted. The efforts by the Council to modify the UDP fail to provide the public with the confidence that agreed, and existing approved UDP Policies, and planning guidance established at Public Inquiry would be delivered. Ref. D, E and F
    - (c) The scheme fails to make proper use of the Riverside site as set out in the current UDP, and T1 Brief Ref. E.
    - (d) Council has given insufficient consideration to the potential conservation, renovation, sustainability, and reuse of public buildings. (As demonstrated

by TRTG Planning Approval and subsequent Town Planning Application.) TRTG will demonstrate with a Condition Report in support on Renovation Conservation and sustainability that there are valid alternative schemes that could have been implemented. Ref. K

- (e) Failure of the Council to prepare a long term plan that has public support resulting in a temporary, piecemeal solution demonstrating a lack of vision

### iii Relationship of Councils scheme with UDP and emerging UDP

The proposal is inconsistent with current UDP policies because: -

- (a) The scheme does not provide for River related uses.  
The Councils proposed changes to the UDP to remove riverside activities, the public lavatories etc, with specific reference to this site have attracted criticism and are not welcomed. (Ref. L)
- (b) TRTG will demonstrate that the history of the site since its acquisition for public leisure use predicate that any long term plan should provide substantive access and public use. (Ref. M)
- (c) The Council's proposed changes to the UDP are un-welcomed, and The Council has yet to establish proper and acceptable development criteria for the site. The Council has ignored views of the public.

### 2. Additionally we are in dispute with the Council because they have: -

- (a) Failed to make proper plans. The Council is, by its proposed modifications to the UDP and future revised site brief seeking to separate the Swimming Pool site from surrounding area, and the King Street properties in particular will prejudice securing low level of development for the Pool site. However, the best chance to get a substantive area for public use on the Riverside is to include the wider area, within an overall urban design brief.

The extent of the enabling development will need to be very limited to meet public expectations for public benefit We will demonstrate that only limited amount of enabling development is practicable if sufficient open space is to be provided (Ref <http://www.twickenhamriver.org.uk/designs05.htm> Fig8)

- (b) Failed to determine our Planning Application submitted 6th December 2002 (Ref. I)
- (c) Ignored the results of public consultation by Riverside Working Group, Co-ordination Group and TRTG.
- (d) Council has failed to take steps to maintain and improve the riverside including: -
  - Closed the Public Toilets against the wishes of the public.
  - Not undertaken remedial work to trees or planters

Failed to take advantage of the TRTG scheme, which has had the benefit of Planning Approval since 2001 (Ref A.)

- (e) The proposed Council scheme lacks mobility access between levels and suffers from technical uncertainty as to the works required to stabilise the rear wall of the river frontage building once the lateral restraint of the building structure has been removed.

3. Suggested Conditions and or Recommendations that would be accepted as additions to a Recommendation for Approval of the Application by the Inspector: -

Public open space equal to area of Pool site lost  
Public toilets retained  
Pontoon included  
Trees and wildlife to be considered  
Playground at the Terrace level  
Riverside and leisure activities included  
Replacement parking for any lost on the Embankment  
A site for a community/public building is provided  
A planning brief for the King Street properties to be prepared in Conjunction with,  
A brief for limited mass and scale of new buildings on the Pool Site respecting the Inspectors Guidines from the 1991 Inquiry

All as set out in “Rethink on the Riverside” Ref. H

List of Documents to be referred to: -

- A TRTG Approved Planning Application Ref 01/0540/FUL  
B [www.twickenhamriver.org.uk/designs05.htm](http://www.twickenhamriver.org.uk/designs05.htm)  
C TRTG Submission to Council  
D Extracts from Existing and Proposed UDP  
E T1 Brief  
F Conclusions to Inspectors Report 1991 Inquiry  
G Extract from Working Party Papers  
H Rethink for the Riverside Produced by the Twickenham Society Co-ordination Group (including TRTG)  
I (1) TRTG Planning Application 6th December 2002 and  
(2) Details to discharge Conditions in respect of Ref. A above  
J “A planning Brief?” Figure 9 and others from TRTG Consultation Paper November 2003  
K TRTG Condition Report Pool Buildings Embankment Frontage.  
L Press report of and extract from UDP Inquiry Riverside and Pool Site  
M TRTG Site History Paper  
N Twickenham Online Reports(various and to be itemised)  
O Richmond and Twickenham Times ( letters and reports to be itemised)

And any others papers as may be relevant