

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

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

TWICKENHAM RIVERSIDE POOL SITE

PUBLIC INQUIRY

11th FEBRUARY 2004

Summary Proof

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on behalf of

Twickenham Riverside Terrace Group, (TRTG)

TRTG/10/02/04

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## Summary for 11th Feb. 2004

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## Summary

The primary concern of the Twickenham Riverside Terrace Group (TRTG) is the retention of significant public open space on the riverside, in the form of a garden.

We are aware from previous planning history and Council actions that this was not the council's objective in securing redevelopment, and thus made our objections known.

We therefore welcome the UDP Inspectors advance report because, if his recommendations are implemented then much of which we have been fighting for will have been achieved.

Provided the Inspectors recommendations are not challenged by the Council, we hope that the community will( at some point) have a replacement for the open space represented by the pool.

The UDP Inspectors recommendations with respect to “immutable open space” again welcomed, as is his recommendation that the Council should clearly define the development brief for the site , including identifying just what the characteristics of the conservation area are , and where the public open space shall be.

The Council has issued a press release welcoming the “Immutable open space “ but because the Council has yet to establish proper and acceptable development criteria for the site. in the form of an “acceptable and detailed” planning brief our objections must be maintained.

However the UDP Inspectors report does provide the opportunity to simplify our case.

A brief summary follows covering design, the partial nature of the Councils short term scheme , and why more detail is required at this stage . My colleague Ron Chappell will also provide a summary of the TRTG case in respect of the TRTG approved scheme , and considerations related to the existing building and alternate more sustainable solutions than those being pursued by the Council.

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## Summary of TRTG case

**2) Design issues;-** The general design and Materials of the scheme, and the layout, height and materials of the fences proposed are prejudicial to and inconsistent with the Conservation Area beers:-

- a high security mesh fence, which will obstruct the view to the river from the play area.
- it will present crude appearance until any planting has time to grow.
- it is likely that the benefit of the intended camouflaged greening effect will not be achieved during the period of use.

- The screened play and seating area will produce a ' Guantanamo Bay' effect until any vegetation has grown (Ref Appendix L page 3, paragraph 4).
- The seating at raised ground level will view the river through this mesh fencing
- there are only 6 seats for the public use and two of these are at ground level overlooking parked cars. These latter seats are also liable to flooding.
- The remainder of the site will be left as present and will be viewed from the screened area.
- public toilet facilities are not included in the current proposals.
- The overall height of the fence and the exposed retaining wall will add to the overpowering effect, of the order of five metres above pavement level. Whilst the existing building is of greater height, the introduction of such an intrusive security style installation adjacent to the embankment is considered damaging to the conservation area.
- The precise nature of the materials and colour scheme proposed has not been revealed.
- We are concerned that the council has as stated in their Rule 6 statement, started to satisfy conditions without explanation as to what those conditions might be or how they are being satisfied prior to the results of this Inquiry are.

### 3) A Partial Solution is inappropriate:

The Short Term Scheme proposes only a **partial solution** within a conservation area and an area needing regeneration. The majority of the site will be left unimproved for at least another 5 years.

We would argue that:-

- such a temporary solution within a temporary scheme will do little to lift the blight that is currently claimed as being caused by the neglected Baths building and Pool site.
- Management of the whole site between Wharf Lane and Water lane, bounded by the service road and the Embankment would appear essential to improve overall conditions, and to achieve improvement to the service road and Water Lane end of the T1 Brief site.
- The temporary scheme by the council will, we submit, do little to encourage the owner of adjacent king street properties a way to rapidly renovate the run down properties at the rear of King Street,

### 4) Need for a plan for “plan lead” determinations

The Council's proposals appear a contrary to PPG 1, PPG15 , PPG 12 and PPG 1 because: -

- 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. All criteria set out in PPG 1

-This site is urgently in need of a planning brief as envisaged in ODPM document "Planning and development briefs: a guide to better practice". The following criteria taken from PPG12 appear to be directly relevant:

- \* a number of different planning, and possibly other, policies are applicable to a site, and clear and consistent advice for potential developers will expedite the development process;
- \* a site with apparent constraints on development is to be promoted as a development opportunity; or
- \*there are features of the site or the surrounding area which warrant specific guidance, on issues such as urban design, ecology, archaeology or the preservation of historic buildings and areas.

The production of such a document, after appropriate consultation would perhaps suggest satisfy objectors to the short term scheme, to quote PPG 12 :-

- "The plan-led system can only be successful and command public confidence if plans are in place and are kept up to date".

#### **5) Lack of vision: a piecemeal approach**

The Council has adopted a piecemeal approach to plan making, creating uncertainty. The Council is, by its proposed modifications to the UDP and future revised site brief seeking to separate the Swimming Pool site from the surrounding area, and the King Street properties in particular will prejudice the opportunity of securing a low level of development for the Pool site unless the Council takes advantage of Section 123 of the Local Government Act 1972, and the memorandum to Circular 6/93.4 to explain that the low level of development is justified by public expectation on such a sensitive riverside site

The extent of the enabling development will need to be very limited to meet public expectations for public benefit. Appendix J demonstrates that only a limited amount of enabling development is practicable if sufficient open space is to be provided. The council should recognise this and not pursue developer levels of profit.

**6) Riverside Activities:-** The TRTG shares with others concern that the Councils development ambitions as landowner, rather than as Planning Authority have resulted in the exclusion of all but minimal "riverside uses" from this the short term and very possibly any redevelopment of the area.

The acceptance by the UDP Inspector of Council's proposed changes to the UDP and proposal T1 modifications to remove riverside activities are disappointing given the work of the Riverside Working Group (Ref. E, G and L2) Co-ordination Group (Appendix H) and TRTG (Appendix P). Ref. P. It was to be hoped that the suggestion in PPG 12 for the Council to have "discussion and negotiation with objectors" to "resolve matters objected to." might have been followed.

We hope that this Inquiry will result in the reintroduction of more significant requirement for active riverside uses within a long term scheme

## TRTG 6 Dec 02 Application

In correct reporting of position by Council. (Ref. Council's Rule 6 Statement.)

Meeting still to be arranged with PLA with respect to the pontoon location. All other matters e.g. café pavilions are clearly now accepted by the council given the intention to include the same within their scheme. Our TRTG position is that the council could have provided approval for the main application with conditional approval on the pontoon location. Summary of position to be tabled following Agreed Points Meeting.

### 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 to be 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 Inspector's Guidelines from the 1991 Inquiry

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