

Twickenham Terrace Garden Group

Please reply to **85 Mallard Place**
Twickenham
TW1 4 SW
01/02/04

Mayer Brown Rowe & Maw LLP

Your Ref 200663/03026614

Dear Mr Robertson

Applications by LBRuT :APP/L5810/V/03/1128907 and APP/L5810/V/03/1128908

I write in response to your letter of the 27 January (and e-mail correspondence)
In response to your questions please find attached :

Appendix N: Items from Richmond and Twickenham Times

- 1) News item announcing Call In
- 2) Six letters supporting Council policy
- 3) Eleven letters opposing Council scheme and supporting proposals.

TRTG

With respect to **Appendix C2** which we intended to contain the TRTG Business case, we note that this document has already been provided in the core documents as submitted by the Council (ref CD19 pages O27 to 032).

With respect to **Appendix C3** , this was intended to be a updated review of or original cost for the TRTG scheme. As at today's date the updated cost document is not to hand.

It is hoped that this document will be available shortly , and at the Inquiry if required

Other Papers At the present moment we do not envisage introducing any further documentation apart from the Supplementary and additional Proofs as Attached

- A) MStearman
- B) R Chappell
- C) J Perry Additional Proof as long term resident Twickenham and Eel Pie Island

As a point of clarification , **Mr Chappell's** original Proof may be found at **Appendix K** of the TRTG PoE.

TRTG Representation: I would confirm that those representing the TRTG are the three individuals identified above.

Yours faithfully

M Stearman for TRTG

Copies of this letter and attachments to :- Shelly Hicks, Planning Inspectorate
Judith Lovelace , TSG.
Clive Wren, Architect.
Tom McKevitt, LBRuT

Attachment 1 Supplementary PoE :
Martin Stearman Architect RIBA, MRTPI, Dip Arch, PgTCP, BTP

This supplementary proof addresses a limited number of key points that have been affected by events since the preparation of our original Proof , or where points raised by others require a response or clarification

Inspectors Report on TI Brief and UDP changes

1. Whilst we are disappointed that that the Inspector also adopted the view that the former pool building does not merit retention, we note that other of his comments are supportive of the TRTG case, as a whole.

2. Particular points made by the Inspector, and which can now be considered as agreed are:

- the established public use of the site has been recognised
- any revised planning brief for the site should be ‘predominantly be for open space ‘
- the that the Council should take steps to define the extent and location of that open space

3. We welcome the inspectors recommendation that the open space should be immutable. This has been the purpose and aim of the Twickenham Riverside Terrace Group (TRTG) in formulating its own proposals.

4. However there is no indication of this resolve in the Councils present short term proposals. Since there are no long term proposals the requirement of immutability is unknown

5. A fundamental point of the TRTG case is that the Council should have produced a Planning Brief telling the public of their intentions PRIOR to the Short Term scheme going forward- this is covered below under “Detailed Plans’

6. Outstanding Points

Merit of the Existing Building

The remaining key issues which we consider are still to be addressed are

a) does the existing building have any merit?

7. Clearly when the original study to define the boundary's of the conservation area were undertaken in 1968 the building was considered important enough to be included within the Conservation Area boundary . Whilst we are not aware of the deliberations at that time , the building when it was in use , and being maintained was a symbol of civic pride to be included in Guides and advertisements to Twickenham.(Ref Dr Edis Annex 6).

8. Even a brief urban design appraisal shows that it has provide an important townscape function in defining the rear of the Embankment at this point. The parking in front of the building diminishes the impact but the central tower rising to nearly three stories , at one time emphasised by a pair of copper embellished flag poles, with flanking two storey wings have present a unified and disciplined 20th C elevation to the river as a foil to the irregular roof line of the domestic properties downstream I.

The building serves a useful purpose in blocking the view of the chaotic visual impression given by the properties at the rear of King Street that would become the backdrop to the Council's short term scheme.

9. Central Twickenham owes much of its character to early 20th century buildings, both as frontage elevations and as place markers and points of reference at road junctions or termination of views. In purely architectural terms I believe that the Baths Building has greater balance, harmony and sense of place than the overlong, poorly articulated frontage to the Thames Eyot building just up stream which has been designated of "of townscape merit".

In paragraph 6.14 Mr Freer refers to the negative visual impact of the existing building.

10. We would suggest that the negative contribution of the building must at least in a major part be due to its derelict and run-down state. Has the Council policy of seeking to redevelop influenced objective architectural and townscape considerations? Would the building make a contribution to the Conservation area were it in good order and active use?

11. That there is a divergence of views is demonstrated by the letters from SAVE, 20th Century Society and Ancient Monuments Society submitted by Mr Wren. In addition there are the professional opinions expressed by Mr Clive Wren himself and appropriately qualified contributors to the TRTG and indeed TSG (Ref 2.1.1) submissions (both groups include Architects)

Council Actions PPG15 Sustainability and Reuse

12. From the above, if the existing building is deemed to have some merit and consequently make a contribution to the Conservation Area, then the question must be raised as to whether the Council has been negligent in respect to the requirements of PPG15, in particular the sustainability and reuse considerations set out therein.

Detailed plans: Need for "acceptable and detailed" proposals

13. We have made the point previously that the Council has adopted a piecemeal approach to the regeneration of the area.

14. As the UDP Inspectors report states the Council should better define the planning brief for the entire site, and most importantly set out the specific urban design and other criteria that any development should comply with. This has not been done.

15. In Mr Freer's proof he states (paragraph 6.6) "in any long term scheme the area covered by the short-term scheme on the smaller application site will be developed in conjunction with the remainder of the site". There is of course no guarantee of this. In fact the Council's actions so far offer no reassurance given that the T1 proposal site is proposed to be halved in size and focus entirely on council-owned land. The further fragmentation inherent in the current proposals will be counterproductive.

16. Whilst superficially the current proposals do not appear to prejudice the redevelopment of the T1 site, more careful consideration suggests otherwise. The Council's original proposals correctly considered that a comprehensive approach

(including land to the north) offered the best solution to achieving a well-designed, properly serviced development optimising the use of the whole site.

17. We submit that the correct approach is for the Council to have come forward a comprehensive plan (preparation of site/ development brief) which addresses the whole site as identified in proposal T1 of the adopted UDP, before proceeding with the short term scheme .

18. Then the public, and potential developers of adjacent sites would have the opportunity to express a view against defined proposals. And if such a brief were available the Council could honour its promise to deal with the whole of the site within a temporary schemes as proposed by TRTG.

MS TRTG 30/01/04

My name is Ronald Charles Chappell I am a practising Chartered Structural Engineer I have over 40 years experience n Structural Engineering principally with Consulting Engineers including Ove Arup..

In the light of the Councils Proofs of evidence and the now released UDP Inspectors Report for Twickenham Riverside. I wish to raise the following points with regard to the submission before this Inquiry

1. **Regional and National Policies;** Regard will need to be paid to PPG 15
2. The Council argues that TRTG proposals for refurbishment are claimed to be non viable because of a lack of a developers level of profit. It appears from the Councils evidence that developers profit is not achieved even by new build of residential blocks and therefore this raises the whole question of the viability of commercial approach to the development on this site.
3. Alternative funding has not been investigated. Nor has the building been offered as a usable asset to any third party. The consideration of a practical and cost effective sustainable method of achieving public open space and community use for the existing buildings has not been explored.
4. The proposed scheme before this inquiry is by Dearle & Henderson. There is a possible conflict of interest in as much that they in acting as advisors to the Council commented on the viability and acheivability of an alternative scheme by TRTG whilst at the same time promoting their own scheme ref Letter RC to G Norton Feb. 2003).
5. These viability and achievability criteria have not been independently assessed The schemes did not consider like with like. The TRTG scheme utilised the whole site and was Coates at £650,000 the Councils scheme utilises 1/3 of the site and its costs are to date given in the Cabinet papers at over £500,000.
6. Refurbishment is essentially conservation and reuse of buildings and potentially a requirement under PPG15. It is a radically different concept to demolish and new build. The Council has been developer led in its appraisal and has not adequately considered a conservation and sustainability proposal.
7. This is the first Inquiry to deal specifically with Conservation Area Consent. It has resulted in a Surveyors and Structural report on the condition of the buildings which have been closed for 20 years'. No attempt has been made by this Council for over 20 years to make use of what is now agreed a robust usable well built building.(Ref Councils Proof Of Evidence Surveyors & Structural Engineers Reports) .

8. Mobility and technical uncertainty issues

9. It is understood that the buttressing and detail of the existing reinforced concrete retaining wall when exposed on demolition of the building required at the column projections have not been costed, agreed or illustrated. These could have a major impact in terms of space available to the public, appearance, and general amenity of the significant Riverside frontage in the Conservation area. The Council has failed to give adequate consideration to this aspect of their proposals
10. Disabled access is only achievable at the Service Road end of the site
11. there is no means of access at the Embankment level.
12. **The Councils failure to maintain and improve the Riverside and maintain the Toilets**
13. With regard to toilets the existing public toilets have a total plan area of 80 sq. metres. These are understood to be up for sale. the short term scheme proposed by the Council has the possibility of providing 1 male, 1 female and 1 disabled toilet total plan area of 10 sq. metres in a building which is understood available to be relocated when the site
14. is developed in 5 years or less .(Councils App 2) .This level of provision is inadequate for the important social and leisure function of the site

RC 01/02/04

Attachment 3

Proof of Evidence :John Perry LLb

In the matter of The Old Baths site

Hearing 11th Feb. 2004

Statement and Proof of Evidence on behalf of Twickenham Terrace Garden Group

15. My name is John Perry of Eel Pie Island Twickenham . I am a retired Solicitor age 73
16. I have been a resident of Twickenham and Richmond since 1947, and have lived on Eel Pie Island since 1981. As a young man I paid many visits to the Twickenham Swimming Baths and are aware of the importance of the Baths to the people of Twickenham
17. From my research into the Minutes of the meetings of the old Twickenham Borough Council it is clear that the land purchased in 1924 by the Council included all the land between Water lane and Wharf Lane, and extended from King Street to the river. At the time Richmond House stood on the land.
18. In 1927 Richmond House was demolished and steps were taken to sell off the land fronting King Street by tender and advertisements were sent to a;; large multiple shop proprietors.
19. The above sales were to add to the revenue of the Borough and with the benefit of the Government loan sanctioned by the unemployed Grants Committee which was interest free for 7 years the Council decided to proceed with a plan to build public and ablutionary baths.
20. On the 27th February 1930 the Town Clerk reported that he had been notified by telephone that the details of the composition of the workforce had been agreed with the Government and the scheme could therefore go ahead.
21. When the land was purchased in 1924 the minutes recorded that part of the land was required for public walks and pleasure grounds which was the classic description of what was public trust land.
22. It is clear from the minutes that since 1930 and the completion of the Swimming Pool that the old baths site has been predominantly used for leisure purposes by the general public up until it's closure some 22 years ago
23. On 28th February 2002 the Planning Committee of LBRuT, which was then under Liberal Democrat control voted in favour of a dense development for the site including luxury flats
24. In May 2002 the Liberal Democrat control of the Council changed to Conservative and the future of the baths site was one of the principle areas of dispute.

25. In the concise aims of the Conservative party as reported in the Richmond and Twickenham Times, and as complied by the Conservative Party itself it stated” This should be a Thames side jewel, and until it can be realised we would demolish the baths and landscape the site and restore it to public use”.
26. On such an important site there should be a comprehensive solution.
27. The whole Embankment area is a mess. There were originally 21 benches facing the river now there are only 4 left , with a 5th which I was responsible for having it installed and which I personally maintain. The public toilets should open and clean , but they are derelict and closed.
28. The Council is fully aware of the want of the repair , which it appears to condone. The minutes refer to the need to repaint the black railings; and the large horse chestnut tree in the very middle has been left missing.
29. A ‘bit by bit’ temporary solution is not acceptable and the appearance of the temporary blank wall with metal fencing above in a long straight line is exceedingly unattractive prospect. There is a real risk , as accepted by the Council at 4.25.5 in the Council’s own revised agenda for 10th December 2002 that “ if a short term option is pursued as a prelude to a longer term scheme , if the long term scheme were to falter or fail, the short term option might have a longer life than intended.
30. As far as the baths are concerned I personally obtained a written quotation from Staines Demolition Co Ltd for the whole site to be demolished and the land flattened all at a price of £125,000 plus VAT, which is considerably less than the £208,000 which the Council is contemplating spending on professional fees in the first eight months and it anticipates spending in excess of these amounts in each of the following four years.

J Perry LLb
30/01/04