

## REVIEW OF LBRuT's "TWICKENHAM AREA ACTION PLAN: FULL REPORT OF CONSULTATION ON THE OPTIONS STAGE"

### Summary

Twickenham Riverside Terrace Group (TRTG) still regards its plans as the strongest contender for Twickenham Riverside.

Following the consultation process and the report on the consultation process, we concluded that:

- The TRTG's Riverside Scenario 1 achieves a high level of support (37%) that makes it an acceptable route forward.
- The TRTG option should be favoured, because it is deliverable and resonant with what was voted as TAAP's most important objective - "enlivening the Thames riverside and improving wider links to open areas along the Thames" – which achieved 90% support.
- The rival options should not be favoured, because in the case of Scenario 2 it scored a far lower vote (24%) and in the case of Scenario 3, it fails on the grounds of feasibility and affordability.

One important stakeholder, Omaha Properties, which owns most of south King Street and might be expected to be most interested in development, criticised Scenario 3 as too complicated and involving too many owners, all for less benefit than a simpler scheme.

TRTG was disappointed with the quality of the Report, as it related to Twickenham Riverside. It lacked research, detail and historic perspective. There were no indications of timelines, constraints, consequences and practicalities.

Broadway Malyan failed to use neutral descriptions for scenarios which were voted on. "Consolidation" and "Transformation", used throughout the Questionnaire and Riverside material, are unacceptable, and, in the context of Twickenham, would have influenced voting. Broadway Malyan themselves appear to acknowledge this unwarranted bias in their Summary, where "new public open space" and "comprehensive approach" replace the old terminology. The new terms are accurate descriptors: the first correctly describes the TRTG scheme's alignment with open space and the second is realistic about Option 3's more radical and expensive requirements.

Because of the limitations of Broadway Malyan's work, we advise:

- The Pre-publication version should use the new terminology and should explicitly list assumptions regarding costs and constraints regarding compulsory purchase, costs and linked development.
- TAAP should not prejudice or delay the realization of any community led proposal for the public use of Twickenham Riverside poolsite land as public open space and community use of its public buildings.

We also believe that a later report should also point out that any commercial deal with property developers, for Twickenham Riverside risks going against Conservative pledges<sup>i</sup>

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## 1. Introduction

This review has been written by Twickenham Riverside Terrace Group (TRTG). It is in response to an extensive report and recent consultations about Twickenham and Twickenham Riverside, organised by the London Borough of Twickenham upon Thames (LBRuT).

TRTR has for many years campaigned against commercial development of Twickenham Riverside. TRTG put forward a scheme for Twickenham Riverside, which has current planning permission and which was substantially used in scenario 1 "Consolidation".

## 2. Background

The report under consideration is titled the "Twickenham Area Action Plan, Options Consultation, Full Report of Consultation on the Options Stage" and dated September 2011. We have called it the "Report".

The Report will become one of the key documents of LBRuT's, Twickenham Area Action Plan (TAAP) and Local Development Framework (LDF). The LBRuT Report is complemented by a "Summary of all consultation", whose author was Matthew Kinghan, Regeneration Associate, Broadway Malyan.

The Report attempts to explain TAAP and put it in its planning setting. TAAP will set out the overall strategy for the future of the town centre, and will identify specific sites for development, covering the period up to 2027. TAAP is a statutory land use plan, whose remit covers the Twickenham Riverside and other key sites, land, buildings, transport, parking and civic spaces. TAAP also has a specific remit: "The aim is to revitalise the town centre." TAAP will, however, not repeat, and will be in broad conformity with, other planning documents, such as the Core Strategy of 2009 and the Development Management Plan, "containing detailed planning policies for the control of development", to be adopted in 2011.

Regarding its own purpose, the Report states, "The purpose of this document is to record how the Options consultation was carried out, the comments and responses received and how these will be taken forward."

The Report will lead to a Pre-publication version to be delivered by end 2011. The Pre-publication version will be "prepared after consideration of comments made at Options stage, public and stakeholder consultation" by end 2011. Thereafter only comments can only be received on the grounds of "soundness". In other words, the report is the critical link between what people want and how that is interpreted in planning strategy and revitalising Twickenham.

## 3. Results

The consultation involved over 2,000 people, a mail-drop to 11,500 local people and businesses, and comments from stakeholders (principally Omaha Properties and TRTG).

We are told 344 questionnaires were received i.e. a response rate of only 0.3% of the Twickenham constituency, or 0.9% of the electorate in four Twickenham wards soon to be shifted into Richmond. According to TRTG's calculations:

- The votes of 37% and 39% for scenarios 1 and 3 respectively are not statistically significantly different.
- The sample size means that one can be 95% confident that the support for scenarios 1 and 3 are within  $\pm 6\%$  of the opinions of the population overall.

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The response is complicated by the fact that different numbers, as low as 231, are given for respondents when taken from the number who ticked boxes (“tick if yes”) for being visitors, residents or workers.

The validity of the results is compromised by:

- The naming conventions for the scenarios  
Names for the scenarios were compromised. The names were not descriptive and were pejorative. How can you agree with “consolidation” when the starting point is that you have been campaigning twenty years for Twickenham Riverside to be changed and revitalised?
- All three options were likely to enhance and transform the Riverside  
The scenario names did not bring out any salient differences between the options. None offered consolidation of what is mostly a derelict area: all aim to enhance and transform.
- Failure to specify the three Riverside scenarios  
Here lack of preparation, clarity and detail undermine meaningful results. For example, in the important, “Appendix 5. Pdf of Display board text”, details are missing and “text is to be inserted” in the description of the three options. Further confusion arises from a picture of Richmond Riverside next to the scenarios.
- Small number of responses  
The number of responses is not sufficient to establish statistical significance in relation to preferences between votes for Riverside Scenarios 1 and 3.

Interestingly the most coherent statements about the Riverside options are found in stakeholders’ comments.

TRTG was said to support Scenario 1, “as it would not involve owners other than the Council and would therefore be more easily deliverable as well as not involving additional building on the site.” This correctly sets out TRTG’s main concerns and priorities, but TRTG would prefer to express their views more positively: their option “would utilise existing buildings for community use and to ensure the ability to raise revenue for revenue and improvements”.

Omaha Properties, the owners and potential developers of Water Lane and King Street, also made a useful contribution. To them, Consolidation “is a wasted opportunity”. They also favoured Scenario 2, Enhancement, over the elaborate Scenario 3, because it was “less complicated and involved fewer owners and more benefit”. These remarks illustrate the nature of the issue, to a commercial developer.

## 4. Report’s recommendations

Appendix 11, Section 8 states, “Overall whilst scenario 3 was the most preferred by respondents, the preferred option for Area Action Plan will comprise of a combination of the most favoured aspects of all of the scenarios following a comprehensive review and further feasibility work.”

Scenario 3 (“Transformation”) was the most popular option for Twickenham as a whole, supported by 41% of respondents. In looking at a combination of the most favoured elements, Transformation (in the Analysis, now called “comprehensive approach”) again wins with a score of 39% in relation to Twickenham Riverside, while Consolidation (now called “new open space”) scores 37%.

Our fear is that, unless corrected, the Pre-Publication version of TAAP might take what was called “Transformation” as the favoured option for Twickenham. We would oppose such an outcome on two grounds:

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- ✚ First, it would provide a blank cheque to waste time, resources and money on an impractical scheme without exploring its practicality and cost assumptions in advance.
- ✚ Second, it would be taking one option - inarticulately expressed and wrongly described - far beyond what it merits, from modest support in one poll.

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<sup>i</sup> In the LBRuT local election of May 2010, the Conservative Party pledged\* to:

- “open up the closed parts of the Riverside to the public”
- “enable a tax efficient way of financing a green community-led solution”
- “work with the Trust (to be set up) and the community in delivering a People’s Riverside”
- “vest the land in perpetuity to a Trust for the people, so that never again can any other council come forward with plans to sell it off for development”.

\*See “Conservative Pledge on Twickenham Riverside”, printed and promoted by David Newman on behalf of Twickenham Conservatives.