

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

26th FEBRUARY 2004

Closing Statement

by Martin Stearman Architect, ARIBA. MRTPI
on behalf of

Twickenham Riverside Terrace Group, (TRTG)

1 **Immutable Open space**

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 as illustrated in the original Hathaway application, and developed with other facilities in subsequent “feasibility option studies”. (TRTG Proof of Evidence Appendices A p 3, and I p 42,43 and J et al)

The Council’s objective is to secure redevelopment, with a still undefined level of public benefit, although a reduced level of development has been indicated

The Council has not, during this Inquiry demonstrated that it accepts the UDP Inspector’s recommendations with respect to “immutable open space”

The Council has yet to establish proper and acceptable development criteria for the site and T1 area, in the form of an “acceptable and detailed” planning brief, therefore our objections to the short term scheme must be maintained.

2 **Design Issues: TRTG** shares with the TSG concerns as to the general quality of design and materials of the Council’s proposed scheme. These concerns were set out in some detail (REF TRTG Consolidated Proof 11/02/04)

The enlarged digital illustration tabled by the Council does, we submit raise further questions as to the quality and detail of those proposals and whether , even for a short term scheme they will actually enhance the Conservation Area.

3 **Does the existing building have any merit?**

The Council have sought to argue that as the TRTG scheme removed the first floor of the building, and proposed alterations to the Embankment elevation, that TRTG cannot object to the demolition of the building.

However, such an assertion fails to recognise that TRTG Hathaway proposal, and those prepared since and submitted to Council, were based on the concepts of reuse and sustainability as provided for in PPG15.

This Inquiry has prompted some reconsideration the Hathaway scheme.

Certainly were the TRTG scheme to be promulgated now, in the light of a renewed interest in Art Deco buildings, perhaps greater regard would have been paid to the architectural merits, and potential contribution of the existing building to the Conservation area.

Were the ground floor windows to be modified as suggested by Mr Wren in his scheme, and the parking relocated to the service road (as suggested in some of the illustrative schemes for the whole T1 area as shown on the TRTG web site), then the perceived “dead end” on the Embankment might be very different.

We set out in our composite document the beginnings of an architectural appraisal of the existing building (Consolidated Proof para 3.2 p4). We leave the Inspector to make his own judgements as to whether the existing building would make **even more** of a contribution to the Conservation area were it in good order and active use.

From the above, one must then ask whether the requirements of PPG15, in particular the sustainability and reuse considerations set out therein, have been followed.

4 Limited level of development & S123; The Council has sought to convince the Inquiry that it cannot consider acceptably low levels of development, refurbishment proposals, or indeed the TRTG scheme because of Section 123 of the Local Government Act 1972.

However we understand that the Council could, using the memorandum to Circular 6/93.4, explain to the Treasury that the low level of development is justified by public expectations on such a sensitive riverside site as set out in a Planning Brief that has been the subject of consultation .

5 Partial Solution: Such a partial 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, or encourage the owner of adjacent King Street properties to participate in the renovation this run down area.

The Council has sought to ridicule ideas for the consideration of the reduced T1 area and the rear of King Street as a whole with an exchange of land values between parties. (TRTG Appendix E pages 26,27,28 and 53).

TRTG submits that to consider the whole area is simply an appropriate planning and urban design methodology e.g. Piccadilly Circus Action Area plan 1975 with colonnades and south side piazza, Victoria Street and Cathedral piazza, Broadgate Square, and closer to home Richmond Riverside

6 Planning Brief: We welcome the future preparation of a planning brief as envisaged in ODPM document “Planning and development briefs: a guide to better practice”.

However the Council's current short term proposals appear contrary to PPG 1, PPG15, PPG 12 and PPG1 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. It is also not set within an acceptable ultimate level of development on the site in the form of mass, scale, floor space or basic urban design criteria. The production of a planning brief, after appropriate consultation, would we suggest satisfy objectors to the short term scheme.

7 Riverside Activities: The TRTG shares with others concern that the Council's 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).

The removal of the lower part of existing building reduces the potential stock of low rental accommodation on the riverside and therefore the possibility of housing river or boat related activities.

8 TRTG Application: The TRTG scheme is a robust, adaptable and valid sustainable, minimal intervention, alternative, potentially temporary scheme in the spirit of PPG 15.

It has an extant Planning Permission that the Council could adapt and implement quickly. It provides a practical use of whole site, and toilets and significant public open space as UDP Inspector recommended.

The Council has acknowledge that ideas from the TRTG have been adopted and are now part of the short term scheme (Phased One covering upstream and Embankment frontages [TRTG Appendices Page 7 and 12 e.t.c] the use of pavilions/removable units to provide cafe' and toilet facilities. TRTG Appendix p 43).

The TRTG scheme was considered by the Council as representing to much of a risk in the communities hands, but clearly these risks can be contained when in the Council hands. We welcome this and simply urge them to complete the job by taking the whole site into their care to provide a greater level of public facilities (TRTG Appendix P42) for and into the future.