

Cathy Molloy  
Planning Officer  
London Borough of Richmond upon Thames  
Civic Centre  
44 York Street  
Twickenham TW1 3BZ.

7 December 2015

Dear Cathy,

**Planning Application 13/1147/DD01: Land known as Twickenham Rough to the west of Twickenham Sorting Office, London Road Twickenham**

**Response of Friends of the River Crane Environment (“FORCE”)**

I am sending this response in letter format as it is too long to fit the pro forma on the Council’s consultation website.

FORCE supports this application, subject to the caveats set out below. It has been a long-held aspiration of FORCE that the MOL of Twickenham Junction Rough be opened up in a manner sensitive to the ecological value of the site, to provide a new public open space for wildlife and the local community, with an access path through it. FORCE would welcome the opportunity to be involved in the detailed design and installation of the pathway.

Our caveats are:

1 Fencing of the path: The Remediation Method Statement (p44) states that "The footpath will comprise a 3.0m wide gravel path with a 1.0m wide maintained grass strip along either side of the path with a fence beyond." FORCE welcomes the assurance received from the developer that the only fence proposed for the main part of the site is one that will extend along the trackside boundary with Network Rail, in order to provide a safe route.

FORCE is opposed to any other fencing of the path, on either side throughout its length. Such fencing would have the effect of creating a tunnel. This would change the nature of the path significantly and limit the original intention of open land accessed along a meandering pathway.

2 Surface of the path: London Borough of Richmond upon Thames (“LBRuT”) proposes that the pathway through the Rough is made entirely from resin bonded gravel. FORCE believes that while this finish may be appropriate for the zone through the buildings, it would not be appropriate for a site of environmental interest and value (designated local SINC). FORCE believes that such a surface would encourage cyclists to speed in a manner incompatible with pedestrian traffic on the mixed-use path; and that the material lacks durability, particularly at even very small gradient changes, and would rapidly become unsafe and require frequent maintenance.

FORCE believes that a self-bonding Cotswold gravel type finish would be more appropriate for the pathway through the majority of the site. It would also match the finishes provided

elsewhere in the lower Crane valley, including the new pathway currently being installed along the Duke's River, reinforcing a consistent "signature" for the Crane pathway.

3 Width of the path: FORCE is concerned that the 3-metre width of the surfaced pathway is excessive. It impinges heavily on the SINC, and it also will encourage cyclists to speed. It is wider than the previous application, and wider than the pathways being installed elsewhere in the lower Crane valley. FORCE is concerned that this excessive width is a consequence of the intention that this pathway be used as the principal pedestrian route for students between the REEC and Twickenham Station, usage which FORCE strongly opposes (see 8 below).

4 Alignment of the path: FORCE supports the proposed meandering alignment of the pathway through the site.

5 Signage of the path: FORCE has developed a style for mapping and signage along the Crane valley and would be keen to see this adopted for this route. Ideally FORCE would like to see a map produced that extends from Moorhead Park to the bottom end of Crane park and includes this site along with the Twickenham Station site.

6 Lighting of the path: FORCE remains strongly opposed to any lighting along this pathway. The site represents a valuable dark foraging space for local bat populations.

7 Closure of the path: FORCE remains strongly opposed to proposals for closing the path between dusk and dawn. FORCE believes that as a newly opened public pathway, the route should have unfettered access on a 24-hour basis.

8 Public use of the path: FORCE believes that a low-impact pathway is appropriate to the opening up of this SINC to public access, and that the principal beneficiaries of this new public access should be local residents and visitors linking up the open spaces of the lower Crane valley.

Accordingly, FORCE would be opposed to promotion of this pathway as the principal pedestrian route for students between the REEC and Twickenham Station, and as a route for spectators to or from The Stoop and Twickenham Stadium.

9 Contamination of the site: FORCE notes the content of the "Supplementary Geoenvironmental Site Investigation Report" of February 2015, including the detail of the contamination of the site. The full extent of any contamination on the land should be understood, so that remedial action can be taken before opening up the space to the public. FORCE assumes that LBRuT will enforce such measures as are necessary to ensure that when the space is opened up, the public will enjoy unfettered access to all of the land adjacent to the path throughout the site for the foreseeable future.

FORCE has enjoyed a very positive and constructive relationship with the developer, and would welcome the opportunity to be involved further in the detailed design and implementation of the new pathway.

Yours sincerely,

Gary Backler, on behalf of FORCE