

Jeffrey Wilson, Planning Officer,  
London Borough of Richmond upon Thames,  
Civic Centre, 44 York Street,  
Twickenham TW1 3BZ

30 August 2016

Dear Mr Wilson,

**PLANNING APPLICATION NUMBER 16/2611/FUL:  
STRUCTURAL ALTERATIONS TO, AND EXTENSION OF, THE EXISTING  
RFU STADIUM EAST STAND**

This response to this Planning Application is submitted on behalf of the Friends of the River Crane Environment (“FORCE”). It comprises:

- Background to FORCE
- Context of this Planning Application
- FORCE position with respect to this Planning Application
- FORCE objectives for this Planning Application
- Conclusion.

**Background to FORCE**

FORCE is an environmental and community charity, which was established in 2003 and now has some 500 members, many of whom are residents of the London Borough of Richmond upon Thames (“LBRuT”).

FORCE has an interest in all activities and works throughout the lower Crane valley, and this includes works which impact upon the Duke of Northumberland’s River (“DNR”). The RFU Stadium has a frontage on its west side of some 700 metres onto the DNR.

FORCE regards the DNR as a neglected asset to the borough and to the wider lower Crane valley. The environment of the DNR is rich and diverse, providing habitat for water voles, kingfishers and other valued species. Any potential disturbance to this environment poses significant risks to the local ecology. Equally, public access to the DNR adjacent to the RFU is of poor quality, with a narrow, overgrown path that does not encourage a civilising footfall.

FORCE was instrumental in securing the award in 2015 of £400 000 of Big Green Fund from the Greater London Assembly, alongside S106 contributions from LBRuT and the London Borough of Hounslow (“LBH”), to improve the DNR and its adjacent footpath.



improvement. The RFU has failed to acknowledge the importance of the DNR as a local community asset, and has failed to engage with the local community to promote or even enable improvements. The 2015 Rugby World Cup provided a prime opportunity for the RFU to deliver an enduring legacy of community benefit through DNR improvements. The RFU failed to grasp this opportunity, whilst at the same time securing its own interests with path closure (and breached conditions), a temporary pedestrian footbridge and additional CCTV in the DNR corridor.

### **FORCE position with respect to this Planning Application**

The RFU has not fully discharged its obligations under the previous planning consent adjacent to the DNR (13/2130/FUL). FORCE believes that these obligations must be fully discharged prior to any new planning permission being approved.

FORCE comments only on the environmental and educational aspects of this application 16/2611/FUL.

In relation to this application, FORCE is strongly opposed to any development in the Stadium which has the effect of increasing the load through the current energy centre, thereby causing any further increase in noise levels, emissions, light pollution or hours of operation of the centre.

FORCE believes that any further plant or equipment related to development of the Stadium should be located away from the DNR frontage, and much nearer to the Stadium. This includes the location of the proposed Combined Heat and Power generator and the proposed photo-voltaic array. Plant and equipment mounted on any part of the Stadium roof should not contribute any increase to noise and light levels on non-match days.

FORCE notes from the Construction Management Plan the proposal to use the North Car Park for construction compounds and temporary car parking. FORCE supports the location of the delivery and construction compounds on the Rugby Road side of the North Car Park rather than on the DNR side.

FORCE notes that the construction access is adjacent to the DNR pathway access at Whitton Dene, and that the temporary car park is proposed to be situated along the length of the DNR pathway. FORCE is concerned to ensure that no damage to the DNR pathway nor pollution of the DNR should result from these construction works. FORCE supports the recommendations of the Ecological Assessment that no works be carried out within 10 metres of the bank top of the DNR, and that the construction compound fencing be located at least 15 metres from the bank top.

FORCE notes the assertion of the Ecological Assessment that "Although the DNR has bank habitat which might be suitable for water voles, there are no historic records of its presence." LBRuT has undertaken several surveys of this reach in the last two years as part of the Duke's River project and has

mapped out a large network of water vole burrows and thereby established that there is a significant and established water vole colony along this reach of the river. Steve Marshall from LBRuT has the draft reports from the consultant that show this.

FORCE supports the recommendation of the Ecological Assessment for the use of native trees and shrubs in landscaping, trellises with pollinator-friendly climbing plants and the consideration of green walls in appropriate areas of new construction. FORCE would like to see these measures extended to construction that has been undertaken under previous planning applications, the conditions of which remain to be fulfilled, especially with regard to the energy centre. FORCE would be pleased to liaise with the RFU on the detail of how this is effected.

**FORCE objectives for this Planning Application.**

FORCE would like to see evidence that the RFU recognises the strategic value of the DNR corridor as a long-term community asset, and is prepared to engage with the community on improving and sustaining the 700-metre DNR frontage onto which the RFU abuts. This application to improve hospitality for RFU clients provides an excellent opportunity to begin this long-term RFU engagement. Improving this RFU section of the DNR path would considerably increase public usage, providing long-term community benefit and improving the social return on the investments already made in adjacent lengths of the DNR path.

In relation to the DNR path, FORCE would like to see the RFU at least fulfil, and ideally exceed, its obligations under Planning Application 13/2130/FUL, stepping back its boundary fences and hedges to release at least 400 square metres for widening of the path along the entire 700-metre frontage. The path should be wide enough to permit disabled access and children's pushchairs, with space for sufficient riverside vegetation to protect water vole habitat, consistent with the new Natural England guidelines.

FORCE has held discussions with the RFU regarding this objective and the RFU were positive about delivering on it. Subsequently LBRuT has drawn up in detail the requirements for path width and fence set back to deliver this objective and sent these to the RFU in June 2016. There are the funds in the Duke's River project to deliver a new path and associated water vole habitat. However, as yet there has been no commitment from the RFU to provide the strip of land and fence set-back required. In our view this commitment would be an appropriate benefit to the community and the local environment arising out of this planning proposal.

The RFU would provide fencing sufficient to meet its security needs along this new boundary line. The planting of hedging and/or climbers would help to mask the fencing and enhance the value of this river corridor. LBRuT would install the new pathway, consistent with the standards of the paths already provided between Mereway and Chase Bridge. The pathway would be a key

part of the DNR walk, with signposting and mapping, and would be included in LBRuT's maintenance schedule. The benefits of this would be substantial to local people as well as the wider population of Twickenham, Whitton, St Margarets and Isleworth, allowing safe and attractive access along the entire 4 km length of the Duke's River path.

FORCE would welcome measures which reduce usage of the energy centre, including reductions in noise, air and light pollution and hours of operation. FORCE would welcome the provision of living walls and a green roof for the centre, to reduce its visual intrusion for users of the DNR pathway.

FORCE would also welcome a litter management scheme associated with the new application, which would limit RFU-generated litter pollution getting into the corridor. This could include a financial contribution towards the costs of keeping the corridor clean and litter-free.

### **Conclusion**

FORCE is very keen for the RFU, as a local landowner and key interested party, to engage positively with the DNR improvement project; and we are using this opportunity to bring it further to their attention.

FORCE would be happy to discuss these issues further with LBRUT as required.

Yours sincerely,

Gary Backler,  
Planning Trustee, on behalf of Friends of the River Crane Environment