

**LB Richmond Local Plan
Response by FORCE – August 2016**

Introduction

This response to the Richmond Local Plan Pre-publication Draft has been prepared by Friends of the River Crane Environment. FORCE is a registered charity, set up in 2003 and with 500 members, most of whom reside in LB Richmond. More information on FORCE can be found at www.force.org.uk

The Objects of the Charity are to protect and enhance the corridors of the River Crane and Duke of Northumberland's River for the benefit of wildlife and local people. This response is prepared in relation to these Objects.

FORCE welcomes the vision behind the council's policies. For example the Corporate Plan 2016 – 2019 (quoted in section 2.1) states; *"The corporate vision is for Richmond upon Thames to be the best borough in London; a borough identified by its green character, historic buildings, high quality appearance, vibrant high streets and outstanding schools and services; one where businesses and the voluntary sector can thrive; where citizens can help change neighbourhoods in which they live"*.

The importance of the natural environment is also recognised by local residents, as noted in section 2.1.14 which states; *"The 2015 Residents' Survey showed that almost all Richmond residents (97%) are satisfied with their local area as a place to live. The natural environment with its high quality parks and open spaces, the location and convenience as well as the quiet and peaceful nature of the borough are the most important attributes for the borough's residents"*.

Finally the Local Plan's strategic vision states; ***"Natural environment, open spaces and the borough's rivers - The outstanding natural environment and green infrastructure network, including the borough's parks and open spaces, biodiversity and habitats as well as the unique environment of the borough's rivers and their corridors will have been protected and enhanced where possible. Residents will continue to highly value and cherish the borough's exceptional environmental quality."***

FORCE wholeheartedly endorses this vision – and the intention for local people to play an active part in delivering it.

The remaining parts of our response relate to (a) the overall approach to achieving this vision and (b) the specific policies with respect to our geographic areas of interest.

Review of the Overall Approach

FORCE welcomes the consideration of "Green Infrastructure" as a separate and important aspect of the Borough's infrastructure – a view which chimes with the primary level of importance attributed to the natural environment by local people.

FORCE also welcomes the following strategic objectives as set out in Section 2.3 of the plan:

- 3. Protect and improve the borough's parks and open spaces to provide a high quality environment for local communities and provide a balance between areas for quiet enjoyment and wildlife and areas to be used for sports, games and recreation.*
- 4. Protect and enhance the borough's network of green infrastructure that performs a wide range of functions for residents, visitors, biodiversity and the economy.*

5. *Protect and enhance the borough's biodiversity, including trees and landscape, both within open spaces but also within the built environment and along wildlife corridors.*
6. *Protect and improve the unique environment of the borough's rivers, especially the River Thames and its tributaries as wildlife corridors, as opportunities for recreation and river transport where possible, increasing access to and alongside the rivers where appropriate, and gain wider local community benefits when sites are redeveloped.*

These are all laudable objectives and FORCE would be very happy to help to deliver them, in line with the Corporate Vision of residents helping to change the neighbourhoods in which they live.

FORCE would go further with respect to Objective 4. In our view Green Infrastructure also has a major actual and/or potential role to play in supporting education and learning, health and well-being, and social cohesion.

FORCE's main concern with the plan is that there are no clear means by which these Objectives are to be delivered – other than an expectation that it may be delivered by local planning gain.

FORCE considers that, for these planning objectives to be met, the council needs (a) a detailed evaluation of the existing value and potential of the borough's green infrastructure and (b) the means of delivering upon this potential. The findings of the evaluation, and the means of delivery, would then need to be built into planning policy.

The Plan identifies the value of green corridors. However, it does not acknowledge that the value of these corridors – from both a wildlife and public amenity perspective – is also a function of how they link with the wider environment beyond the borough boundaries. This aspect is of great importance to both wildlife and local residents, neither of which are constrained by these boundaries. Acknowledgement in the plan, and implementation through joint working with adjacent boroughs and cross borough organisations (such as catchment partnerships for example), would in our view greatly aid the delivery of protections and improvements both within and outside the borough, to the benefit of the borough's wildlife and residents.

The Plan does not mention the value of open spaces and wildlife corridors as dark corridors for the benefits of nocturnal wildlife including bats. There is in our view a need to identify and to protect and enhance these areas and corridors.

Specific Areas of Interest

FORCE does not agree with the proposal to remove CP12 and the Lower Crane Area of Opportunity from the plan. These two policy initiatives have been very helpful over the last five years in delivering improvements on the ground in the lower Crane valley. FORCE does not agree that the plan has "largely fulfilled its role". The Richmond College site and station site are still to be delivered on the ground; and there are potential new developments at both Harlequins and the depot site. In addition, several other sites (Greggs, RFU and the Mereway Day Centre) are adjacent to the Area of Opportunity.

In our view there is a need to review the operation of the SPG and CP 12 and then to update it so that it continues to be effective in delivering improvements in line with council strategic objectives. There would be considerable benefit to widening this Area of Opportunity to include Greggs, Mereway Day Centre and the RFU sites, such that the potential benefits to the adjacent green corridor of any developments at these sites can be properly evaluated and delivered.

The policy proposals also remove any reference to river restoration for the lower Crane. This opportunity is currently being actively investigated by the Crane Valley Partnership working group, including LB Richmond, LB Hounslow, Environment Agency and FORCE. FORCE believes that improving the value of the lower Crane, currently within a deep concrete culvert, is entirely in line with the strategic objectives of the plan and needs to be included specifically if improvements are to be secured on the ground.

FORCE notes section 5.7.4 with the following specific references to the Crane corridor:

“The River Crane is an important river corridor, which runs for 30 kilometres from Harrow through Twickenham and St Margarets to the Thames at Isleworth, and which has benefited from significant environmental improvements. Where appropriate, developments alongside and adjacent to the River Crane should contribute to the overarching aim of creating a new metropolitan park that provides a continuous, accessible link between Hounslow Heath and Twickenham Station, including a long distance footpath, improved access for surrounding communities and an enhanced wildlife corridor”.

FORCE welcomes this section though we would note the following developments since it was first drafted several years ago:

- The objective of a continuous accessible riverside open space between Hounslow Heath and Twickenham Station is now largely realised, although the designation of metropolitan park is yet to be conferred
- There has been considerable progress and public engagement downstream of Twickenham Station, linking with Friends of Moormead and The Tidal Crane Association among others, such that the aim can now be extended to include the tidal reaches of the river to the River Thames
- There has also been considerable investment and improvement works along the Lower Duke of Northumberland’s River, enhancing its status as a high value river corridor linking the River Crane and Thames through Twickenham, Whitton and Isleworth. We believe that the greatly enhanced value and importance of this corridor needs to be reflected in the Plan
- The benefits of these actual and potential developments are also wider than is currently set out in the plan. In our view these benefits include the wider Objectives we propose for Objective 4 above of “education and learning, health and well-being, and social cohesion”.
- This aspiration is part of a wider set of Objectives for creating a coherent wildlife and amenity corridor along the 30 kms of the Crane valley that have been almost a hundred years in the development (since the Middlesex Plan of 1926). Wider objectives are set out in the GLA’s All London Green Grid and are being delivered through the Crane Valley Partnership, of which LB Richmond is a key member

The access distances set out in Section 8.49 (page 152) differ from those in the London Plan with no apparent justification – viz 400m for local park and 800 for district park. A walking speed of 1m per sec is more reasonable for carers with children and older people - making it 7+min and 20min. The same applies to childrens’ play area – London Plan requirements of 800m not 1200m. The policy should be explicit that the distances are to park access points along pedestrian routes and not distances as the crow flies, also taking into account extra time required to cross main roads and other barriers.

We have not looked at the Site Allocation information in any detail. However we can make some initial comments based on a first review as follows:

- SA 10 should refer to DNR
- SA 11 should make it clear that any proposals should facilitate improved access along DNR and include environmental improvements
- SA 12 drawing omits crane and new bridge, and height limitation essential

FORCE would greatly appreciate the opportunity to meet and discuss the issues raised in this response with the council planners as part of this review and consultation process.