

Mr C Hurst,  
Planning Officer,  
London Borough of Richmond upon Thames,  
Civic Centre,  
44 York Street,  
Twickenham  
TW1 3BZ

22 November 2016

Dear Mr Hurst,

**SUPPLEMENTARY PLANNING DOCUMENT  
LONDON BOROUGH OF: HILLINGDON, HOUNSLOW AND RICHMOND upon  
THAMES  
DEVELOPMENT CONTROL FOR NOISE GENERATING AND NOISE SENSITIVE  
DEVELOPMENT  
July 2014**

**RESPONSE OF FRIENDS OF THE RIVER CRANE ENVIRONMENT**

This letter contains the response of Friends of the River Crane Environment to this public consultation. Our response includes:

- An introduction to Friends of the River Crane Environment
- General comments on the Supplementary Planning Document
- Comments on specific sections of the Supplementary Planning Document.

Introduction

Friends of the River Crane Environment ("FORCE") is an environmental and educational charity comprising some 500 mostly local members, committed to the protection and improvement of the environment and ecology of the River Crane valley. The River Crane runs for 30 kms through five London Boroughs, including Hillingdon, Hounslow and Richmond upon Thames. For further information about FORCE, please see [info@force.org.uk](mailto:info@force.org.uk).

General Comments

The focus of this Supplementary Planning Document ("SPD"), for understandable reasons, is on the protection of residents and residential buildings from noise-generating development. However, FORCE would like to see this consideration extended to the environment and ecology of the relevant London Boroughs. In particular, FORCE would like to see this consideration extended to the users of open spaces, who need tranquillity; and to the ecology of open spaces, in particular wildlife which will be disturbed, potentially irreversibly, by incremental noise intrusion. In this context, FORCE would like the definition of

noise-sensitive receptors to include all areas of Metropolitan Open Land and/or Green Belt that are available for public access.

The Crane Valley is a noise-sensitive environment, offering open space and tranquillity to a dense urban population which encroaches very closely onto the River Crane throughout its length. A considerable proportion of this population is economically disadvantaged, and dependent for amenity on access to free open spaces such as those offered by the Crane Valley. It is important for social-equity and public-health reasons that the quality of these open spaces is maintained, including their quality in relation to noise intrusion.

Also, it is important to consider noise impacts on wildlife, including nocturnal species, which may be vulnerable to different types of noise and different types of intrusion from that which intrudes upon residents. The continued flourishing of this wildlife is a key contributor to the quality of the open spaces and to the overall ecology of the Crane Valley.

Specific Comments (referencing respective sections in the SPD)

### 2.3 LOCAL POLICY

FORCE supports: “The boroughs will also seek to improve and enhance the acoustic environment when suitable opportunities arise and will aim, in the longer term, to develop local policies to promote appropriate soundscapes, including identifying and protecting Quiet Areas and relatively tranquil places.”

### 3.1 PRINCIPLES & REQUIREMENTS

FORCE supports, in particular “the protection of relative tranquillity and quietness where such features are valued.”

### 3.5 GENERAL APPROACH TO NOISE SENSITIVE DEVELOPMENT

FORCE supports: “There will be a general presumption against new noise sensitive development that is likely to experience significant adverse effects from noise unless it can be demonstrated that the economic and/or social and/or environmental benefits associated with the proposed development outweigh the adverse effects.” FORCE seeks assurance that in weighing adverse effects, appropriate weight will be given to the issue of adverse effects on open spaces and their ecology.

### 3.6 GENERAL APPROACH TO NOISE GENERATING DEVELOPMENT

FORCE supports: “There will be a general presumption against development which gives rise to significant adverse effects from noise unless it can be demonstrated that the economic and/or social and/or environmental benefits associated with the proposed development outweigh the adverse effects.” FORCE seeks assurance that in weighing adverse effects, appropriate weight will be given to the issue of adverse effects on open spaces and their ecology.

## 6.1 NOISE STANDARDS FOR NEW INDUSTRIAL AND COMMERCIAL DEVELOPMENT

FORCE supports your observation that “some of the most commonly occurring noise issues with commercial developments are associated with building services plant, usually air-conditioning equipment or kitchen extraction systems.” FORCE regards the location of the air conditioning plant beside the Duke of Northumberland’s River by the Rugby Football Union as a particularly egregious example of such development, destroying the tranquillity of a much-needed riverside walk by day and disturbing bat habitat by night.

It is in this context that FORCE would like to see the need to protect environmentally or ecologically sensitive locations made explicit, for example by the following insertion: “All industrial and commercial development with the potential to generate noise will be assessed and, where relevant, controlled by planning conditions in order to protect residential *and environmental* [author’s italics] amenity.”

Again, in 6.2, FORCE would like to see “The methods described use outdoor sound levels to assess the likely effects of sound on people who might be inside or outside a dwelling or premises used for residential purposes upon which sound is incident” modified to recognise the need to protect environmentally or ecologically sensitive locations as well as residential buildings.

FORCE is pleased to see the recognition in 6.6 that “It may also be necessary to prevent creeping outdoor background noise levels affecting any specially designated quiet and/or tranquil areas in the Boroughs.” FORCE would again like to see explicit recognition that these areas include environmentally or ecologically sensitive locations, as well as, for example, hospitals or care facilities.

### Conclusion

FORCE would welcome the opportunity to discuss these issues in greater depth with appropriate officers.

Response prepared by

Dr Gary Backler,

Planning Trustee, on behalf of Friends of the River Crane Environment (FORCE)