

PLANNING APPLICATION P/2015/3085 RESPONSE BY FORCE

1.0 Introduction

This document sets out the response of Friends of the River Crane Environment (FORCE) to the composite planning application P/2015/3085 for the Hounslow Heath Golf Club site.

FORCE is an environmental and community based charity with a remit to protect and enhance the green corridor of the River Crane. We were founded in 2003 and have over 500, mostly local, members.

This proposal encompasses around 50 hectares of the River Crane corridor and is therefore of major interest to FORCE.

FORCE submitted a response to the Scoping Opinion (SC/2015/2292) for this proposal – and this response is enclosed as Appendix A to this response. FORCE has discussed the proposal with the developer and also met with the developer and toured the existing Hobbledown operation near Epsom in early July.

2.0 Location and Context

The Hounslow Heath Golf Club site comprises around 50 hectares of Metropolitan Open Land within both the River Crane corridor and Hounslow Heath.

The main river channel forms the western site boundary for a full 2000 metres and the Mill Stream channel of the river runs through the site for around 1000 metres. The eastern boundary of the site, of around 1000 metres, is with the Local Nature Reserve, comprising the remnant 85 hectares of Hounslow Heath.

The River Crane corridor, also known as the West London Green Chain, is one of the most important wildlife and environmental corridors in London, extending for around 30 kilometres from its source in Harrow to its confluence with the River Thames in Isleworth. The river corridor, including this site, is designated as a Metropolitan (or London wide) Site of Importance for Nature Conservation (or SINC) in recognition of its environmental value.

The Crane corridor runs through five London boroughs and is overseen by the Crane Valley Partnership (CVP). CVP comprises the five boroughs (including LB Hounslow) alongside GLA, Environment Agency, Thames Water, London Wildlife Trust and many others (including FORCE).

Hounslow Heath is a rare heathland habitat for London, designated as a Metropolitan SINC and also a Local Nature Reserve due to its habitat value. The Golf Course represents another part of the main heath, which once covered around 1600 hectares of west London.

The London Outer Orbital Path (or London LOOP) runs through the middle of the site. This is a 240km orbital path for London and known as the M25 for walkers. The Crane Path runs along the western edge of the site – this 30km route links the River Thames (Twickenham, Isleworth and Richmond) to the south east with Heathrow, Hillingdon, Ealing and Harrow to the north and west.

In summary, the site is part of two iconic west London environmental assets and two key green access routes – of key importance for both environmental and community reasons. This context is not reflected in the application that has been submitted.

3.0 Planning Context

The site is Metropolitan Open Land and Green Belt.

The site is a part of Hounslow Heath and a part of the Crane corridor – two Metropolitan Sites of Nature Conservation.

The site is a key part of the GLA's All London Green Grid area 10, sitting within the central part of the Crane corridor.

LB Hounslow's spatial strategy (2015 to 2030), in its key diagram, identifies the Crane corridor through this site and states that enhancement of this corridor is a key target. This is attached as Figure 1.

Local Plan policy GB4 requires proposals to (a) identify and protect the existing green infrastructure network...; (b) work with partners to deliver projects that enhance and maximise the benefits of the green infrastructure network and (c) promote projects to improve access to the green infrastructure network.

The following extracts from the LB Hounslow UDP and emerging Local plan are relevant to this application:

UDP http://www.hounslow.gov.uk/udp_4_natural_environment.pdf

“Acceptable development in green belt ENV N 1.2

The Council will not permit except in very special circumstances, any development which is not compatible with the principal purposes of the Green Belt.

Green belt improvements. The Council will pursue ways of improving the positive role of the Green Belt in providing attractive landscape, visual amenity and improvement of land for wildlife, including restoration, maintenance and management of land, enhanced provision of public access and use, on land in its ownership and on land in private ownership when opportunities occur.

Habitat management ENV N 2.4

The Council will conserve and enhance areas of ancient and established habitats through appropriate means of protection and sympathetic management with reference to the Hounslow Local Biodiversity Action Plan, including where required, through agreed management plans with other landowners.”

http://www.hounslow.gov.uk/local_plan_proposed_submission_draft_consultation_document_-_volume_1_part_1.pdf

“Objectives Feltham

2.5.2 point 6 P44 - 6. *Opening up access to and along the River Crane particularly from Hounslow Heath.* FORCE note: there is also a map on p45 showing proposed routes along the Crane through Hounslow Heath.

2.6.3 -point 4 p50. *Improving links to Hounslow Heath and opening up access to and along the River Crane and Duke of Northumberland’s River.”*

[http://www.hounslow.gov.uk/local_plan_proposed_submission_draft_consultation_document - volume 1 part 2.pdf](http://www.hounslow.gov.uk/local_plan_proposed_submission_draft_consultation_document_-_volume_1_part_2.pdf)

“Green and Blue Infrastructure

Our approach. We will protect and enhance Green Belt and Metropolitan Open Land to maintain its openness, quality and permanence. This will be achieved through the positive management of both designations and improving public access.

7.3. *Both the Green Belt and Metropolitan Open Land make up a large and important part of the borough’s green infrastructure, playing a significant role in providing space for habitats and biodiversity, and access to nature for local residents. They also boost environmental resilience by helping to control flood risk and mitigating the risks of climate change. These designations make up large parts of a network of open spaces, linking the borough and beyond as part of the Green Grid.*

Policy GB4 - The green infrastructure network

Our approach. We will protect and enhance the green infrastructure networks throughout the borough, particularly those identified as part of the Mayor of London’s All London Green Grid. The network will be improved to maximise its diverse benefits and multiple functions, and improved public access to, and links between open spaces will be encouraged. FORCE note: the Crane corridor is identified here.

We will expect development proposals to... d) Make a positive contribution to the green infrastructure network by improving its quality, functions, linkages, accessibility, design and management and e) Incorporating elements of green infrastructure on site to integrate into the wider network of green infrastructure, and assist in the greening of the borough. This may include provision of green roofs, sustainable urban drainage systems, trees, squares, plazas and pedestrian access routes.

Policy GB5 – Blue Ribbon Network

Our approach a. We will protect and enhance Hounslow’s Blue Ribbon Network, recognising the multifunctional role that rivers and over waterbodies play and their potential to contribute the borough’s regeneration. FORCE note: the Crane is identified here)

Policy GB7 - Biodiversity

Our approach. We will protect and enhance Hounslow’s natural environment and seek to increase the quantity and quality of the borough’s biodiversity. FORCE note: The Crane Valley Partnership is mentioned here) FORCE note: there is a useful map on p160

*We will expect development proposals to f. Contribute to the greening of Hounslow, by incorporating green roofs, landscaping, tree planting and other measures to promote biodiversity such as bat and bird boxes, through the **preparation of ecological plans and strategies where major developments are proposed (our emphasis),** thereby resulting in a gain for biodiversity in the*

borough; g. Contribute to the action plans set out in the Hounslow Biodiversity Action Plan; h. Contribute to environmental improvements through developer contributions where appropriate, including through a potential biodiversity offsetting scheme.

Policy EQ3 – Flood risk and surface water management

Our approach. We will ensure that flood risk is minimised by ensuring that developments are located appropriately and incorporate any necessary flood resistance and resilience measures. In addition, surface water will be managed through an increased emphasis on sustainable urban drainage.

Delivery Plan; c. Promoting the opening up of river corridors and making space for water through the creation of buffer zones to water courses and increasing floodplain connectivity;. d. Working with partners to ensure the provision and maintenance of flood defences, in-line with the Infrastructure e. Encouraging the take-up of opportunities to improve flood resistance and resilience in the borough's existing built environment, including drainage improvements, flood guards and raising electrical sockets and other vulnerable fittings; and f. Working with the Environment Agency to implement to actions of the Thames Estuary 2100 plan.

Policy EQ5– noise

Our approach. We will seek to reduce the impact of noise from aviation, transport and noise generating uses, and require the location and design of new development to have considered the impact of noise, and mitigation of these impacts, on new users according to their sensitivity

Policy EQ6 – Lighting

Our approach. We will reduce the light pollution impacts of development, and promote reduced light pollution and sky glow across the borough

Policy EC2 – Developing a sustainable local transport network

Our approach We will secure a more sustainable local travel network that maximises opportunities for walking, cycling and using public transport, reduces congestion, improves the public realm and improves health and well-being.”

Biodiversity Action Plan

http://www.hounslow.gov.uk/biodiversity_action_plan_oct13.pdf

“Map of SINC sites p19 Map of Nature Conservation areas

Wet woodland p40

Rivers and streams p74 9.0

Aims. To maintain and enhance the communities of riverine fauna and flora within the Borough. To achieve an improvement in water quality throughout the Boroughs rivers and streams. To increase awareness of the function and value of rivers and streams within the Borough.

P96 Woodland” FORCE note: Hounslow Heath is listed here

These policies are not reflected in this application. At the end of this document FORCE sets forward various amendments that would in our view help to meet these policies.

4.0 Effect of the Planning Application on the Site and the Surrounding Area

This response by FORCE only deals with the potential impact of the proposal on the River Crane corridor and associated open spaces. FORCE is not concerned with any wider social, economic or transport issues for example as these are outside of our objects.

Effects on the open-ness of Hounslow Heath: one of the most valuable aspects of Hounslow Heath – from a historical and community perspective – is its open-ness. At present there are clear views over the site from the Heath and (even though there are no formal paths across the site) the site itself has been open for walkers to traverse for many years. The proposal at present is unclear as to how much of the site will be fenced. However, it is clear that the proposal as it stands will have a significant negative impact on the open-ness of the heath as a whole.

Introduction of noise and disturbance into the River Crane corridor: the proposals envisage a large increase in the use of the site with associated major increases in traffic use. The proposals have a “Go Ape” type development extending into the middle of the River Crane corridor – including the space within the area between the Mill Stream and the main river channel. This type of development attracts a large audience of excited young and older users and a large amount of noise is inevitable as a result. The development at the existing Hobbledown site in Epsom is much different, being a much smaller “high ropes” scheme designed for smaller children.

Effects of increased development and urbanisation of these open spaces: the Hounslow Heath site is of iconic significance to the history of the Borough and is of great environmental value – as befits its Local Nature Reserve status. The proposals introduce a large number of additional people and traffic into the Hounslow Heath area alongside a number of new structures, large new car parks and associated fencing and lighting. These developments are all tending towards the urbanisation of these spaces.

Light disturbance of the night time corridor: the River Crane corridor and Hounslow Heath are important night time habitats for nocturnal animals, particularly bats. This scheme will introduce more light and disturbance into this night time arena and effect the value of these habitats.

Introduction of development into the flood plain: the Go Ape proposals are within the active flood plain of the River Crane

The implications of the proposed surfing lake have not been fully assessed: the proposed surfing lake has major additional implications for the value of the River Crane corridor environment – through development, noise, loss of habitat, water supply and disposal etc – however there is so little detail provided with this outline proposal that it is not possible to make a proper assessment of it.

5.0 Reasons for Objection

The site proposals provide a number of significant impacts upon the value of two key open spaces within LBH – as listed above

The site proposals do not reference the value of the surrounding open spaces and do not provide any significant environmental or community mitigation measures to counterbalance the impact on these open spaces.

The proposals compromise the value of the London LOOP and Crane pathway

The site proposals do not meet the requirements of LB Hounslow UDP and emerging Local Plan policies. Some of the relevant policies are listed in section 3.0 above. These policies seek to protect, enhance and improve the environmental and community value of important spaces such as the River Crane corridor and Hounslow Heath. The proposals as they are set out do not do this. There are no significant improvements proposed, the setting is not acknowledged and there are several significant detrimental impacts upon its value.

The proposals are not appropriate for Green Belt and Metropolitan Open Land

6.0 Mitigation Proposals

The development of this major open space provides an enormous opportunity for associated improvements to the environmental and community value of the high value adjacent open spaces. This opportunity is not taken by the proposal as it stands.

FORCE has set out proposals below for how a development of this nature could also contribute to the environmental and community value of the corridor and thereby meet the requirements of local and national planning policy. These are also illustrated in the plan attached as Figure 2.

The area between the Mill Stream and the main channel of the River Crane is in the centre of the river corridor, of high environmental value and prone to flooding. As such it is not appropriate space for such a leisure based development. This area of land, comprising around 10 per cent of the total proposed development area, should be retained as a public asset as an intrinsic part of the high value Crane corridor.

The existing River Crane path on the west bank of the river is narrow and prone to flooding – as such it is difficult to operate as a cycling and walking route. This development provides an opportunity to create a new dual cycle and footpath on the eastern bank of the river. This route would utilise the existing underpass beneath the already busy A315 road and provide a new and improved London LOOP way and green walking and cycling linkage between Feltham, Hounslow and Heathrow.

There should be an agreement to manage and limit fencing of the site so as not to compromise the views across the Hounslow Heath and the open access for the public over the remnant golf course area – which has been enjoyed for many years.

The project needs explicit and conditioned commitment to support and enhance the environmental value of these two key environmental assets for Hounslow – River Crane corridor and Hounslow Heath.

Outline Planning permission should not be granted for the surfing area. The proposals are too vague and it is not possible to gauge their impact upon the adjacent River Crane corridor. This area could be better utilised for any

proposals displaced by retaining the Crane flood plain area between the Mill Stream and main river as a public asset.

These proposals if adopted would in our view both allow a rump development to go forwards and provide key benefits to the environmental and community value of the area – alongside a key new green transport link for LB Hounslow. As such it would meet the key requirements of local and national planning legislation.

Appendix A

FORCE Response of July 2015

Dear Sirs,

We understand that this application (SC/2015/2292) is currently being considered by planners at LB Hounslow - specifically with respect to whether a formal environmental assessment is required. We are writing to address this question and note:

- FORCE is an environmental and community based charity with a remit to protect and enhance the green corridor of the River Crane. We were founded in 2003 and have over 500, mostly local, members
- This proposal encompasses around 50 hectares of the River Crane corridor and is therefore of major interest to FORCE
- We have met with the applicants both at the site (Hounslow Heath GC club house on 22nd June) and their existing operations in Epsom (on 3rd July) to discuss the project proposals
- We have seen a layout plan for the site but have not seen any other documentation - and cannot find any on the LB Hounslow web-site
- We understand that the planners are reviewing a scoping report and considering whether the proposals require an EIA

We would like to make the following comments at this early stage:

1. Our main concern with this or any other development proposal in the Crane valley is to review its impact and to seek for it to deliver a net benefit to both the environmental and community value of the corridor
2. In considering this proposal we are mindful of both (a) the actualities of the proposal being considered and (b) the potential longer term implications of any changes in use granted
3. The site comprises a large area (50 hectares) which includes part of two Sites of Metropolitan Importance for Nature Conservation - MO76 (Crane Valley) and MO81 (Hounslow Heath). This is the highest SINC designation and identifies the site as being of London wide importance. The site is also classified as Metropolitan Open Land
4. It is also a very important part of the Crane valley corridor - a 30km long green corridor for people and the environment also known as the West London Green Chain. This is also recognised at a GLA level as part of the All London Green Grid - and through the Crane Valley Partnership (CVP) which includes the GLA, five London boroughs including LB Hounslow, the Environment Agency and FORCE
5. The proposals include components with the potential to impact upon its SINC and MOL quality including:
 - fencing to demarcate large parts of the site
 - significant new buildings
 - large areas of car parking
 - large areas of floodlighting
 - the introduction of noise from the new activities - in particular the high wire zip wires proposed
 - the introduction of a large new open water area to the north of the site

- the introduction of native and non-native species into compounds on the zoological part of the site

6..The London LOOP crosses the golf course site and this access route is to be preserved. Whilst there are no other formal PROW across the golf course site it is currently very permeable to public access and there are a number of informal routes across the site with links to pathways along the Crane corridor and Hounslow Heath. These will potentially be lost if the fencing proposals go ahead.

FORCE has engaged with the applicant on this matter and there is interest in providing a NW to SE walking and cycling link across the site which could link with both the London LOOP and the Crane valley walk – but as yet no formal commitment.

Given the above we consider the proposal to be of considerable environmental importance to the Crane valley and London as a whole and would expect that CVP, GLA and the EA would be invited to engage with the project at an early stage. We do not know whether this has been the case and will send this response to the appropriate contacts there.

We believe there is potential/risk for both environmental and community benefits as well as impacts from this project proposal - dependent upon the details of how it is designed and delivered - and the opportunities provided for interested parties to contribute to this process.

For these reasons we consider that a formal environmental assessment is required for this proposal,

Regards,

Rob Gray
Chair of FORCE

http://planning.hounslow.gov.uk/Planning_CaseNo.aspx?strCASENO=SC/2015/2292

System Reference: SC/2015/2292

Planning Reference: 01054/H/SCOPE1