

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

23 September 2015

Dear Cathy,

PLANNING APPLICATION NUMBER: 15/3038/OUT

**LAND A316 JUNCTION LANGHORN DRIVE AND RICHMOND COLLEGE
INCLUDING CRANEFORD WAY PLAYING FIELDS AND EGERTON ROAD
TWICKENHAM**

**RESPONSE TO CONSULTATION BY FRIENDS OF THE RIVER CRANE
ENVIRONMENT**

This letter constitutes the response of the Friends of the River Crane Environment to the formal consultation undertaken by the London Borough of Richmond upon Thames ("LBRuT") with respect to the Outline Planning Application ("OPA") submitted by the Richmond Education and Enterprise Campus ("REEC") development partnership and registered in September 2015. This response contains:

1. Background to FORCE
2. A comment on the Local Community Forum
3. The policy context for the Outline Planning Application
4. Comments on specific aspects of the OPA
5. Conclusion.

1 Background to FORCE

Friends of the River Crane Environment ("FORCE") is a registered charity. Our Objects are to promote for the benefit of the public, and to advance the education of the public in, the conservation, protection and improvement of the physical and natural environment of the River Crane. We are a non-political organisation which has been operating in the Crane Valley for the past eleven years, and we have a membership of nearly 550, most of whom are residents of the lower Crane Valley.

FORCE is pleased to have a track record of working constructively with both LBRuT and Richmond upon Thames College ("RuTC"), and hopes to continue this relationship into the future. In the context of this specific application, FORCE emphasises that we support in principle the upgrading of the College, and we recognize the need for new school facilities.

Moreover, FORCE is excited by the opportunities which development of the RuTC site offers for the achievement of improvements to the environment of the Crane Corridor. These will benefit both new and existing residents and the schools.

FORCE believes, however, that the upgrading of the College must not be achieved at the expense of the local environment. Nor should it be achieved by restricting access to open spaces, particularly by the economically and socially deprived; nor by degrading the quality of those open spaces that remain accessible for free.

2 A comment on the Local Community Forum

In June 2014 the REEC development partners set up a Local Community Forum (“LCF”) to represent interested local community groups, and the LCF has met roughly monthly since then. Representatives of FORCE have attended every meeting of the LCF except one. FORCE has sought at all times to work constructively with the forum and set out at an early stage (July 2014) the environmental issues that were of significant concern to FORCE with regard to the development. These are enclosed herein as Appendix A.

FORCE has, though, found the experience of participating in the LCF unsatisfactory, as:

- Despite assurances, the LCF administration has failed to circulate relevant papers in advance;
- The development partners have failed to address significant issues through the LCF, including in particular the consideration of the impacts of the development on Craneford West Field and the impacts of pedestrian flows along the new path through Twickenham Junction Rough;
- Most seriously, the development partners have never once conceded that they recognise that the proposed development will have impacts along the wider River Crane corridor, but instead have confined themselves to an extremely narrow definition of the impacted site;
- We have been promised on a number of occasions a presentation and discussion in the forum of proposed environmental benefits coming out of the development. This has still not been provided.

In short the forum has not in our view undertaken any significant consideration of the environmental concerns that FORCE has set out to the forum, either in response to Appendix A or during forum meetings.

In our response to the consultation on the Environmental Impact Assessment (“EIA”) Scoping Report of July 2014, FORCE flagged four key omissions:

- omission of a master-plan approach which sets the environmental impacts of the REEC development within the wider context of the lower Crane valley within LB Richmond

- omission of consideration of impacts on and enhancements to the West London Green Chain (the term used to describe the Crane valley corridor as a whole – crossing five London boroughs and recognised as one of the most important green corridors in London)
- omission of consideration of the impacts of the REEC development on open-space provision and the deprivation index in the lower Crane valley within LB Richmond
- omission of consideration of impacts on and enhancements to the Duke of Northumberland's River.

The subsequent EIA addressed none of these omissions. The intransigence of the REEC development partners and their blinkered approach in these matters have rendered the LCF process nugatory and frustrating.

FORCE believes that the environmental impacts of the proposed REEC development must be considered in the context of:

- the open spaces of the entire lower Crane valley corridor, not just of the river adjacent to the REEC site
- the series of other developments currently underway or planned for the lower Crane valley, not just as an isolated development.

To have had genuine value, the LCF process should have acknowledged this wider context, and broadened its focus accordingly. It never did.

3 The policy context for the Outline Planning Application

LBRuT's own planning policies set the context within which the REEC OPA must be evaluated. LBRuT's Core Strategy of April 2009 states that:

“CP12 River Crane Corridor:

12.A The Council will improve the strategic corridor to provide an attractive open space with improvements to the biodiversity. Developments in and adjacent to the River Crane Corridor will be expected to contribute to improving the environment and access, in line with planning guidance.”

Appendix B contains a relevant extract from the Crane Valley Planning Guidelines of April 2005.

The proposed REEC development clearly meets the definition of a development “in and adjacent to the River Crane Corridor.” Thus, in order to comply with the requirements of its own planning policies, LBRuT is obliged by the terms of CP12.A to provide improvements to the environment from the redevelopment of the RuTC site – that is, net environmental enhancements, not merely mitigations and compensations for environmental damage. The reference to “contribute to improving” provides a stronger expectation than either “net neutrality” or “mitigation.”

In FORCE's view, REEC has:

- consistently refused to acknowledge its obligations under CP12.A
- created deliberate confusion around its obligations under CP12.A
- failed to comply with its obligations under CP12.A.

as set out below.

3.1 Refusal to acknowledge obligations under CP12.A

The OPA itself references the Crane Valley Planning Guidelines, but unlike the references to other planning policies, it omits crucial detail. In particular, it makes no reference to environmental improvements. The “Environmental Design Principles” upon which the OPA is based do not refer anywhere to the Crane Valley Planning Guidelines, nor do they adduce “contribut[ion] to improving the environment” as a design principle in itself.

This selectivity is epitomised by an e-mail from the Chair of the LCF, Robin Ghurbhurun, on 2 March 2015:

“With regard to your comment on LBRuT’s planning policy requiring the proposed development to demonstrate “net environmental benefits”, we cannot find specific reference to this in the relevant policy documents (LBRuT Core Strategy 2009; RuTC Planning Brief 2008; Crane Valley Planning Guidelines 2005). These policy documents generally refer to the provision of environmental improvements or enhancements.”

3.2 Creation of deliberate confusion around obligations under CP12.A

The REEC has consistently sought to conflate two issues, that of a right-hand turn into the A316 and that of environmental improvements, as a zero-sum game. The Chair of the LCF has consistently adopted the position that since the development will have to fund the costs of the right-hand turn, it has fewer funds available to afford environmental improvements.

FORCE rejects this position. FORCE believes that, under the terms of CP12.A, the REEC is obliged to meet the expectation “to contribute to improving the environment and access.” FORCE does not acknowledge any linkage between the costs of a right-hand turn into the A316 and compliance with CP12.A.

3.3 Failure to comply with obligations under CP12.A

FORCE believes that the REEC development partners’ current proposals impose several major dis-benefits upon the environmental and associated community value of the Crane corridor, viz:

- fencing-off from public access of a substantial proportion of the Craneford East Field
- replacement of natural turf by artificial surfacing in the fenced-off area
- loss of open space and natural turf across the entire North Playing Field, adjacent to the A316, which will become a major new building

- increased wear-and-tear on Craneford West Field and other adjacent, already crowded open spaces, consequent on increased usage caused by the REEC development (see 4.4 below)
- increased usage of the new pathway through Twickenham Junction Rough, under the REEC proposal that this become the principal pedestrian access between Twickenham station and the REEC (see 4.5 below)
- prospective lighting of the Craneford East Field artificial surfaces. This is a likely downstream outcome of the creation of this space and can only be definitively ruled out by insertion of a planning condition to that effect.

These dis-benefits must be neutralised before any “contribution to improving the environment” can be achieved. FORCE believes that:

- dis-benefits of such magnitude can only be countered by adopting a corridor-wide perspective in the lower Crane
- the estimated £70 million value of the REEC development provides scope for funding significant environmental improvements
- these improvements are required in order for the development to comply with adopted LBRuT planning policy. Therefore funding is independent of expenditure for other community mitigation purposes, such as providing a right-hand turn into the A316 for example.

It is essential that benefits offered for the purposes of neutralising dis-benefits and achieving “contribution to improving the environment” must be within the control of the REEC development partners to deliver, and must be contractually binding and enforceable. Otherwise, they are no more than aspirations.

FORCE believes that the mitigations and compensations for environmental damage proposed by the REEC development partners do not achieve a position of neutralisation of the scheme’s dis-benefits, let alone provide the net environmental improvements required to comply with the CP12.A obligations.

In view of the failure of the development proposal to comply with the requirements of LBRuT’s planning policies, FORCE would be deeply concerned if, as one of the development partners, LBRuT were to be prepared to compromise its own planning policies in seeking to advance this development proposal.

4 Comments on specific aspects of the OPA

FORCE has specific comments on the following aspects of the OPA:

- Failure to take account of the impacts of the REEC development on the overall planning strategy for the lower Crane valley

- Inadequacy of REEC proposals to restore and naturalise the banks of the lower Crane to increase its environmental and community value
- Failure to consider impacts on and potential improvements to the environmental value and public access along the Duke of Northumberland's River
- Deeply negative impacts on Craneford East Field and Craneford West Field
- Inappropriateness of proposed improvements to pedestrian pathways
- Failure to include a management plan for the open spaces.

4.1 Failure to take account of the impacts of the REEC development on the overall planning strategy for the lower Crane valley

The Environmental Statement of the OPA acknowledges the cumulative effects of the developments of Twickenham Railway Station, the Twickenham Post Office Sorting Office Site and the Twickenham Junction Rough (1.4.9). LBRuT also requested that consideration be given to future redevelopment of the Harlequin Football Club and the Council Depot. FORCE would also request that consideration be given to future redevelopment of Gregg's Bakery and Mereway Road Day Centre sites (both listed for development in the Council's Site Allocation Plan of 2014). Each of these site developments has the potential to impact significantly and cumulatively upon the environmental and community value of the lower Crane corridor.

Yet the REEC development partners have consistently taken a very narrow view of their proposed development, in particular with regard to its environmental impacts. FORCE rejects the REEC assertion that "there was insufficient information about how and when the [Harlequin and Depot] sites might be redeveloped to undertake any meaningful cumulative assessment" (1.4.11). Given the strategic importance of the REEC development, both in terms of the number and size of the sites affected and the expected lifespan of the investment, FORCE believes that the REEC development partners have a responsibility to make much greater efforts to model and understand the cumulative effects of all of these cumulative developments than they have evidenced in their Environmental Statement. This responsibility is particularly apposite, given that one of the REEC development partners is LBRuT itself.

Given that FORCE regards the analysis of cumulative effects as inadequate and flawed, FORCE obviously rejects the assertion that "Cumulative effects from other developments were taken into account in the transport assessment...but are not predicted to result in significant adverse effects." (2.2.9)

FORCE believes that the REEC development partners should use the opportunity to take a wider perspective, and consider making improvements to open spaces at other locations within the lower Crane Corridor. This would give them a further means of complying with their CP12.A obligations to provide environmental improvements in the Corridor. For example, the Challenge Court open space could be brought into more public use, and managed alongside other open spaces in the Corridor.

Any such improvements should be made in the context of an overall strategic plan for the lower Crane valley. LBRuT should produce an overall plan for the area that seeks to optimise the value of the River Crane Corridor as a result of any or all of the proposed developments.

A commitment by LBRuT to produce such a master plan is foreshadowed in the Lower Crane Valley Supplementary Planning Guidance (“SPG”) of April 2005, seeking: “*A positive policy of environmental improvement, improved access and sympathetic development ... applied to the River Crane ‘area of opportunity’*” and “*looking at the area comprehensively with a view to enhancing the open space and associated linkages*”:

- showing how developments in the lower Crane valley will contribute to improving the environment and access for the local community
- integrating development proposals and funding availability “*from Hounslow Heath to Twickenham Station to form the Crane Riverside Park*” (Core Strategy, p.99)
- including a phasing plan to show how “*the objectives of the [planning] framework will be linked to specific phases of the development.*”

As part of this master plan, FORCE would like to see a clear plan for the provision of environmental and access enhancements to all the open spaces in the Crane corridor. As CP12.A states (see above), such environmental and access enhancements are intrinsic to development in and adjacent to the River Crane Corridor to offset increased pressures on open spaces caused by development and enlarged population. This is re-iterated in the Twickenham Area Action Plan – which does not extend to the REEC area or much of the lower Crane valley but which sought to “*Enhance the open spaces of the Crane Corridor and manage them for environmental benefit as well as community use.*” Twickenham Area Action Plan, p.28). The master plan should include, but not be limited to, provision of environmental and access improvements to open spaces at Craneford East Field, the Depot, Mereway, Mereway Rifle Club, the Duke of Northumberland’s River (“DNR”), Challenge Court and Moor Mead. The master plan should incorporate outcomes from the ongoing village-planning process.

4.2 Inadequacy of REEC proposals to restore and naturalise the banks of the lower Crane to increase its environmental and community value

Restoration and naturalisation of the banks of the lower Crane has been an objective of LBRuT planning policy for the past ten years. The 2005 SPG requires that: “*Development proposals must contribute to a scheme for restoration of more naturalised banks to the river through the framework area...This would remodel or replace the concrete vertical sided channel to establish marginal vegetation and to improve its nature conservation value, as well as increasing water quality.*”

It is also a key element of the River Crane catchment plan, recently produced by the Crane Valley Partnership, members of which include LBRuT, the Environment Agency (“EA”) and FORCE. This plan identifies environmental improvement opportunities for the entire Crane catchment. Those that are local to this site include:

- Remove concrete channel to restore 330m of river in Craneford Playing Fields on the left bank and Twickenham Rifle Club on the right bank
- Remove concrete bed and bank and restore natural two-stage channel along 500m through Twickenham Junction Rough
- Remove concrete channel to restore 600m of river in Moor Mead Park

- Fish easement for weirs between Mereway Road and the LBRuT boundary
- In-channel habitat enhancements to improve morphological diversity in reaches between Mereway Road and the LBRuT boundary that cannot be fully restored.

FORCE is aware that the EA wishes to see a feasibility study undertaken for river restoration along the entire lower Crane below the Mereway Road weir in order to assess the overall potential along with associated costs and benefits. FORCE supports the approach of conducting such a feasibility study as a first requirement of river restoration. However, FORCE rejects the development partners' position with regard to this feasibility study.

FORCE understands that the REEC development partners have proposed a contribution of £50 000 "towards a feasibility study that the EA is planning to undertake on river restoration options in the Crane Valley" (18.7.12). The partners justify this amount on the grounds that the scheme does not have any impact on the river corridor, and that £50 000 was the amount specified by the EA.

Firstly, FORCE rejects the partners' view that the scheme does not have any impact on the river corridor. The Environmental Impact Assessment acknowledges that "The proposed development has been assessed as giving rise to an adverse effect with respect to the provision of open-space and MOL" (18.7.112). In FORCE's view, as noted above, the proposals cause significant environmental dis-benefits to the corridor well beyond the length of the College's river frontage. Moreover, the proposals are likely to have a disproportionately negative impact on the river corridor, in terms of litter and stress on wildlife, given the REEC's proposal that the route through Twickenham Junction Rough and Marsh Farm Lane should be the principal pedestrian access to the REEC site (see 4.5 below).

Secondly, FORCE rejects that the Environment Agency is the entity that should act as the arbiter of the value of the adverse effect caused by the scheme. The statutory interests of the EA extend to only 8 metres from the river bank and the wider context of the green corridor is outside its remit. The EA therefore is not in a position to assess the impact upon the wider corridor. Nor, unlike the council, does it have an obligation such as CP12 to do so. Nor will it be the recipient of the Section 106 funds, nor will it have any jurisdiction over their expenditure. So whilst the EA may or may not be satisfied with this agreement, it is not in a position to consider these wider environmental matters nor to negotiate the quantum of environmental contribution that the REEC partners have to make in order to comply with LBRuT's CP12.A.

Thirdly, in light of the acknowledged "adverse effect," FORCE regards the sum of £50 000 towards the feasibility study as a totally inadequate amount, either as mitigation for the "adverse effect" or as "contribut[ing] to improving the environment." The feasibility study may constitute one of numerous measures required to mitigate the "adverse effect." However, in FORCE's view, in order to meet the CP12.A requirement that the scheme "contribute to improving the environment," the scheme needs to deliver a major physical benefit to the river corridor. To this end, FORCE expects that substantial funding would be provided, on a committed basis, to deliver one or more of the opportunities listed by the catchment plan, to be implemented following completion of the EA feasibility study.

4.3 Failure to consider impacts on and potential improvements to the environmental value and public access along the Duke of Northumberland's River

The DNR runs along the western edge of the REEC site on the western side of the proposed Langhorn Drive access to the development. The DNR is likely to form a principal pedestrian access route to the REEC for students north of the A316.

Yet the development partners have consistently refused to acknowledge the relationship between the DNR and the REEC site, and despite representations from FORCE, the DNR has consistently been excluded from the Environmental Impact Assessment of the development.

Given that the DNR is likely to form a principal pedestrian access route to the REEC for students north of the A316, and given that this pedestrian access will benefit the REEC by reducing the demand for vehicular access to the REEC site, FORCE believes that as a minimum, the REEC should fund the improvement of pedestrian access to the DNR from both sides of the A316. FORCE also believes that the REEC should fund other improvements to the DNR as part of the REEC's obligation to meet the requirements of CP12.A.

Funds are already available (under the GLA's Big Green Fund Two and others including Harlequins S106) towards improvements to the DNR. FORCE will pay particular attention to ensure that any funding contributed by the REEC will be net-additional to that made available through others and not double-counted. FORCE would urge that any improvements funded by the REEC should be planned to support and dovetail with those funded by others. FORCE notes that there is a steering group in place to manage the DNR improvement works and that this would thus be in a good position to manage any further funding.

4.4 Deeply negative impacts on Craneford East Field and Craneford West Field

These two fields constitute a significant proportion of the open space available to the public in this section of the lower Crane. The fields have been available for local public use for the past fifty years.

The pressure on these open spaces will be significantly increased as a result of at least three developments in this part of the lower Crane corridor. FORCE does not accept that the REEC application, with its obligation to contribute to improving the environment, has adequately considered the impacts of these successive increases in pressure.

By the time that the REEC development is completed, the pressure on these open spaces will already have been increased by the opening of the Brewery Wharf development. Craneford East and West Fields will be the nearest open spaces accessible to the Brewery Wharf residents without crossing a major road.

The REEC development itself will add up to 200 residential units. Again, Craneford East and West Fields will be the nearest open spaces available to the REEC residents. FORCE does not accept the REEC partners' contention that the open spaces provided around the residential units will absorb the pressure imposed by the additional residents. These open spaces will be heavily circumscribed by buildings, thus making the Craneford Fields even more attractive.

Finally, unless and until a pedestrian pathway from Twickenham Station to Moormead Park is provided, as part of the Twickenham Station redevelopment, Craneford East and West Fields

will be the most accessible open spaces for the new residents of the Twickenham Station redevelopment. Even after the path to Moor Mead opens, Craneford East and West Fields will still provide an accessible alternative to Moor Mead for these residents.

In this context, FORCE rejects the view that “this part of the Borough has good coverage, quality and value of greenspace” (18.7.88). FORCE believes that the cumulative effect of the above developments will have a drastic negative impact on the coverage, quality and value of the Craneford Fields and of other adjacent green spaces, even before implementation of the REEC development. FORCE surveys of the usage of the next adjacent greenspace, Kneller Gardens, which have been available to the developers but do not appear to have been considered in their evidence, suggest that congestion is already detracting from the quality and value of that open space, deterring children and toddlers from using it. The negative impacts of the REEC development on Craneford Fields may be expected to have a similar consequence here, with all the adverse implications for the physical and mental health of future generations that that implies.

FORCE also rejects the partnership conclusion that “the effect of the REEC development on open-space and MOL is therefore identified as minor to moderate adverse” (18.7.88). On the supply side, three areas of greenspace (the North Playing Field, and Craneford East and West Fields) are reduced to one by the development, as the North Field is built over and the East Field is artificially surfaced and fenced off from public access.

On the demand side, FORCE believes that far more than “a 7.2% increase in the population likely to use the [West Field] facility” (18.9.10) will occur. FORCE challenges the REEC partners’ use of a 1-kilometre radius (18.7.83) as a basis for calculating the percentage increase. This is contrary to the “Open Space Strategies Best Practice Guidance” published by the Commission for Architecture and the Built Environment and the Greater London Authority in 2009. This “sets out a hierarchy of public open spaces...that should be applied in London” which sets a maximum distance from homes of 400 metres to “local parks and open spaces.”

Use of the 1-kilometre radius has the effect of inflating the base population and generating estimates of change that appear small when expressed in percentage terms. The percentage increase in population likely to use Craneford West Field within a 400-metre radius of the West Field is likely to be very much greater than 7.2%: this 400-metre radius would take in usage generated by the new REEC housing, the new Brewery Wharf housing, the Council Depot and Harlequins developments, as well as the increased usage that can be expected from students and pupils of the REEC site itself (see 4.4.2 below). The Twickenham Station housing lies just outside the 400-metre radius, but will nevertheless contribute to the percentage increase in usage of the West Field too.

FORCE believes that “coverage, quality and value of greenspace” is about access, availability on demand, a sense of openness for public usage and a sense of community-centricity, as well as about the wear-and-tear of playing surfaces. All of these attributes are threatened by the corraling of demand onto an already overworked Craneford West Field. FORCE rejects that the impacts are “minor to moderate adverse” – if realised, they would be severe.

4.4.1 Craneford East Field

In the above context, the REEC proposal to fence off the majority of Craneford East Field from public access represents a significant loss of open space. It also runs directly counter to the Twickenham Area Action Plan which pledges to: “*Enhance the open spaces of the Crane Corridor and manage them for environmental benefit as well as community use* (author’s emphasis).” (p28).

Moreover, whilst the present application does not seek provision for floodlighting of the artificial playing surfaces, FORCE expects, particularly in light of experience elsewhere in LBRuT, at the former Whitton School for example, that an application for floodlighting will follow. Floodlighting would be significantly detrimental to the quality of life of local residents, and would be significantly deleterious to the local environment (particularly local bat populations). FORCE therefore seeks, as a minimum, that approval of the artificial surfaces and fencing of Craneford East Field be made formally conditional on an assurance for perpetuity that no subsequent application for floodlighting of the East Field will be approved. This would be consistent with the design principles applied to this development.

Finally, the provision of artificial surfaces and fencing – and especially any floodlighting – compromises the value of the spaces as a night-time habitat for bats. The area comprising Craneford Fields, the Rifle Club and Twickenham Junction Rough, bisected by the River Crane, represents one of the few dark corridors in this part of the borough. The proposals for Craneford East Field will disrupt the linear landscape for bats, interrupting their flight-line. The loss of turf will also remove the insect habitat crucial to bat feeding.

FORCE understands that the REEC development partners intend to mitigate the disturbance to bats by increasing tree-planting along the line of the A316, in the belief that insects will be drawn to the streetlamps. But building over the North Playing Field will destroy insect-generating habitat. Moreover, it has been shown (A review of the impact of artificial light on invertebrates, Bruce White, C and Shardlow M, Buglife, 2011, referenced in “Rivers and Light Pollution” produced by the Richmond Biodiversity Partnership) that lighting exercises a “vacuum” effect on the insect populations which would otherwise feed bats. A third of the insects that fly around light will damage themselves or die, leaving less prey for foraging bats. This proposal by REEC therefore displays a worrying misunderstanding of the potential impacts upon bat habitat of this development.

FORCE does not necessarily accept the Ecology assessment that the reduction in bat foraging habitat will be “minor” (2.9.4). FORCE also believes that night-time commuting and foraging and bird breeding activity will, not “may” be impacted (2.9.6), and that increased trampling and litter will, not “could” result (2.9.7). FORCE does not regard “industry good-practice measures for reduction and containment of lighting and noise” (2.9.4) as sufficient mitigation. FORCE would request formal planning conditions to prevent floodlighting of Craneford East Field and lighting of the pathway through Twickenham Junction Rough.

4.4.2 Craneford West Field

The restriction of public access to Craneford East Field proposed by the REEC development will throw the increasing pressures for open space onto Craneford West Field and other adjacent, already crowded open spaces. In addition to the pressures posed by Brewery Wharf, the 200 REEC housing units and Twickenham Station development mentioned above,

increased usage will arise from members of the public excluded from Craneford East Field. It will also arise from the College itself. FORCE rejects the assertion that “both College and Secondary School pupils’ needs will be met within the REEC development” (18.7.84). College students in particular will be free to leave the College site and its private spaces at any time, and will likely gravitate towards the West Field, particularly if the East Field is already in use for organised games, as will Secondary School students too, particularly after school hours. Junior football and rugby teams, and potentially others displaced by the development of both the North and East Fields, will also seek to use the West Field.

FORCE understands that another nearby school has already applied for permission to hold organised sports on the West Field. Harlequins FC, one of the development partners, already runs a programme of regular mini-rugby sessions on the West Field, which are particularly excluding of the general public and destructive of the surface of the playing field.

This increased usage will inevitably impose increased wear-and-tear on Craneford West Field, making it more difficult for the public to get onto the Field, and making the Field less pleasant to use. But as noted above, FORCE’s concerns are about much more than just the wear-and-tear of playing surfaces: they are about access, availability on demand, a sense of openness for public usage and a sense of community-centricity.

FORCE believes that the assessment of the impacts of the proposed REEC development on the public use of available open spaces, including but not limited to Craneford West Field, needs to be much more rigorous than that presented for the OPA. The OPA acknowledges that “there will be increased demand over the current baseline position” (18.7.86), but its quantification of the cumulative impacts is not credible, for the reasons outlined above. Nor does it explicitly recognise the distributional impacts of this aspect of the REEC proposal. The general public, including those from economically and socially deprived backgrounds who might be expected to benefit most from access to the physical and mental health benefits of open spaces, will be excluded from these open spaces by these proposals. They will be forcibly displaced by the economically and socially privileged who can afford the fee-rates charged by REEC for the use of Craneford East Field.

It is critically important that the REEC development partners set out clear proposals on which local open space areas are to be used by (a) college students (b) secondary school students and (c) students of the special needs facilities; how these uses are to work and what the implications will be for general public use. There is no significant information on these matters in the proposals as currently produced by REEC. Previous experience indicates that there are considerable difficulties caused by dual use of open spaces by school children and the general public and it is important to identify potential conflicts and debate how these might be resolved in advance of any planning permission.

In the first instance, if fencing and artificial surfacing of Craneford East Field are approved, FORCE believes that an essential corollary is a formal planning condition which prevents schools, Harlequins FC and other organisations from using Craneford West Field for organised games.

4.5 Inappropriateness of proposed improvements to pedestrian pathways

FORCE has extensive experience of the volumes and patterns of usage of riverside pathways in the lower Crane Valley through its detailed usage surveys at several locations on a number of occasions dating back several years. Based on this experience, FORCE rejects the view that the impacts on walking and cycling will be “minor” and “negligible,” relative both to current usage levels and, in the case of Twickenham Junction Rough (“TJR”), to the intended usage of the site. FORCE acknowledges that it is particularly difficult to model transport outcomes for options which do not currently exist. However, FORCE believes that the development partners need to analyse the potential pedestrian and cycling flows with greater rigour than is currently evidenced, and evidence consultation with the developer of Brewery Wharf as to the impacts on future Brewery Wharf residents of the likely increased usage of the TJR pathway arising from the REEC development. FORCE also believes that the development partners’ proposals should only be approved with significant assurances of appropriate improvements.

Marsh Farm Lane is an old pathway dating back at least two hundred years. It is already used by students and local people as a walking route, but cannot be used easily for cycling due to its narrowness. FORCE believes that the REEC development should include the following improvements to this pathway:

- lowering the wall between Craneford West and East Fields, retaining the arches whilst creating a visual link between the two fields
- improved access from the southwest corner of the East Field to and over the rail bridge, including provision of a cycle gutter and aesthetic improvements
- improved access around the proposed new link into the footpath through Twickenham Junction Rough to the Brewery Wharf development
- widening and landscaping of the path through the College site, including linking this path into any newly created green spaces within the College site
- a bridge to provide an improved link between the East Field and the pathway through the Rough.

FORCE is very concerned by the proposal that the new public pathway through the TJR should be identified as the primary route to the College site. This proposal may be superficially attractive to many local residents, as they envisage it would take College students away from the residential streets around the college. However:

- the College has no jurisdiction over how College students move once they have left College grounds
- the current plans are for the pathway through the TJR to be closed after dark, at which time all students would need to use the residential streets
- it must in any case be unacceptable to try and insist that College students travel through a more quiet and secluded space that some would be uncomfortable or feel unsafe when using.

Accordingly, this proposal is not deliverable by the College, and the College is therefore creating a false expectation for local residents.

Furthermore, in order to try and deliver upon this expectation, there may be a temptation to try and change the fundamental nature of the TJR to make it more acceptable for student use. These changes would inevitably compromise its value as a public open space and Site of Local Importance for Nature Conservation (“SLINC”). Approaches that would fundamentally impact upon the environmental value of this site would be lighting, over-widening of the pathway and removal of trees and associated understorey. FORCE has been consistent in its requests that this path should be relatively narrow, unlit and meandering, constructed from Bredon gravel and consistent with the ecological status of the site as a SLINC.

Finally, the proposal would markedly increase usage of the new pathway by adding student usage to that by Brewery Wharf residents and other residents. It would also markedly increase the risk of littering of both the site and the river. The development partners propose that “The conservation of these sites could be enhanced by the College and schools supporting local programmes of nature education and community involvement in practical conservation” (2.9.7). FORCE regards this as unenforceable and inadequate, and would seek instead a long-term commitment to fund the management and maintenance of these open spaces.

It should be noted in this respect that the public asset of the TJR pathway was delivered as a planning benefit from a different and unrelated lower Crane site – the Post Office Sorting Office, now Brewery Wharf, site – at which time it was explicitly stated that the pathway would be designed as a low impact scheme so as to preserve and enhance the environmental value of the lower Crane corridor. In our view the REEC scheme has no right or jurisdiction in interfering with the agreed benefits of another scheme.

4.6 Failure to include a management plan for the open spaces

The proposals contain no reference to a management or maintenance plan, either for the open spaces included within the REEC development, or for the open spaces adjacent to the development within the wider lower Crane Valley, which will be directly impacted by this development.

Consistent with our desire for this development to be considered within the context of a wider strategic plan for the open spaces of the entire lower Crane Valley (see 4.1 above), FORCE believes that the proposals should include fully resourced plans for the ongoing maintenance of all of the open spaces adjacent to the Crane. These will form an essential foundation for the establishment and sustainable maintenance of the enlarged Crane Park envisaged in 2005 SPG.

5. Conclusion

FORCE does not in principle oppose development of the RuTC site. FORCE objects to these specific proposals for developing the site. FORCE’s objections are grounded on the failure of the proposals to comply with the obligations of CP12.A to “contribute to improving the

environment and access,” and on the extent of the adverse environmental impacts of the proposals. FORCE welcomes the opportunity that development of the RuTC site presents to secure long-term benefits for the environment and local community, and FORCE seeks to play a constructive part in that future development.

Yours sincerely,

Gary Backler, Planning Director,
For and on behalf of the Friends of the River Crane Environment (FORCE)

APPENDIX A:

Richmond Education and Enterprise Campus (“REEC”):

FORCE objectives for environmental improvements

July 2014 (V1.0)

Document purpose

This document sets out FORCE’s objectives for environmental improvements to the lower Crane corridor. The obligation to provide environmental improvements as an integral component of the re-development of the Richmond College site arises from the requirements of LBRuT’s planning policy. This document places FORCE’s objectives for environmental improvements firmly within the context of LBRuT’s planning policy.

This document has been prepared for use in discussion and negotiation with the key parties to the REEC development proposal. As such, the document will be open to development as these discussions progress. A date and version control will be provided for each version to aid this process.

Context for FORCE objectives: Overall Council Planning Policy

LBRuT Core Strategy April 2009:

“CP12 River Crane Corridor:

12.A The Council will improve the strategic corridor to provide an attractive open space with improvements to the biodiversity. Developments in and adjacent to the River Crane Corridor will be expected to contribute to improving the environment and access, in line with planning guidance.”

FORCE Objective One – an overall planning strategy for developments in the lower Crane valley, building upon the Lower Crane Valley Supplementary Planning Guidance (“SPG”) of April 2005

The REEC proposals are only one of a number of planning developments, either started or envisaged, in the lower Crane valley. These include Twickenham Post Office Sorting Office (“POSO”) site and Twickenham Station site (both currently in the early construction phase) and the Council Depot, Gregg’s Bakery and Mereway Road Day Centre sites (all listed for development in the Council’s Site Allocation Plan of 2014). Each of these site developments has the potential to impact significantly upon the environmental and community value of the lower Crane corridor. FORCE requests that the Council produce an overall plan for the area that seeks to optimise the value of the corridor as a result of any or all of these developments.

A commitment by LBRuT to produce such a master plan is foreshadowed in the 2005 SPG to deliver: *“A positive policy of environmental improvement, improved access and sympathetic development ... applied to the River Crane ‘area of opportunity’”* and *“looking at the area comprehensively with a view to enhancing the open space and associated linkages”*:

- Showing how developments in the lower Crane valley will contribute to improving the environment and access for the local community
- Integrating development proposals and funding availability *“from Hounslow Heath to Twickenham Station to form the Crane Riverside Park”* (Core Strategy, p.99)
- Including a phasing plan to show how *“the objectives of the [planning] framework will be linked to specific phases of the development.”*

As part of this master plan, FORCE would like to see a clear plan for the provision of environmental and access enhancements to all of the open spaces in the Crane corridor. As CP12.A states (see above), such environmental and access enhancements are intrinsic to development in and adjacent to the River Crane Corridor to offset increased pressures on open spaces caused by development and enlarged population (*“Enhance the open spaces of the Crane Corridor and manage them for environmental benefit as well as community use.”* Twickenham Area Action Plan (“TAAP”), p.28).

The master plan should include, but not be limited to, provision of environmental and access improvements to open spaces at Craneford East Field, the Depot, Mereway, Mereway Rifle Club, the Duke of Northumberland’s River (“DNR”) and Challenge Court. The master plan will need to be undertaken before the REEC proposals are too far developed, as it will seek to identify ways in which this project integrates with other local development opportunities, with the overall purpose of optimising the benefit for the environment and local community.

FORCE Objective Two – naturalisation of the banks of the lower Crane to increase its environmental and community value

The lower reaches of the River Crane below Kneller Gardens, and through the entire Lower Crane “area of opportunity”, are constrained within three-metre deep vertical concrete banks, installed in the 1930s. As a result the river is divorced from the surrounding green spaces and has a limited environmental value. Removing these concrete banks and creating a more natural river system has been a long-term aspiration for the area, reflected in policy statements by LBRuT and the GLA, and currently the subject of an Environment Agency assessment.

The 2005 SPG notes: *“Development proposals must contribute to a scheme for restoration of more naturalised banks to the river through the framework area...This would remodel or replace the concrete vertical sided channel to establish marginal vegetation and to improve its nature conservation value, as well as increasing water quality.”*

River restoration along the Craneford West and East Field margins, through Twickenham Rough and the POSO site to London Road, would be in accordance with the GLA’s London

River Restoration Strategy (2006), supported by the Environment Agency (“EA”) and Crane Valley Partnership (“CVP”):

- Total removal of a pilot section of the concrete channel, with full river restoration of the pilot section
- “*Creation of more natural riverbanks*” (TAAP, p.26) throughout the length of the concrete channel
- Landscaping and habitat improvements within the channel to enhance the river’s ecological value.

The EA and CVP are currently undertaking a feasibility study for this work, in conjunction with LBRuT and LB Hounslow (for downstream reaches). This would potentially be followed by major funding bids to third parties such as EU LIFE Fund. FORCE would expect the REEC project to support these investigations and make appropriate contributions in terms of land use and funding.

FORCE Objective Three – improvements to the environmental value and public access along the Duke of Northumberland’s River

The DNR runs along the western edge of the REEC site and links the River Crane at Kneller Gardens with the River Thames at Isleworth. The DNR is recognised as a “site of borough importance for nature conservation” and provides a habitat for water voles and kingfishers, as well as other species. The corridor has been neglected for many years. FORCE has a long-held aspiration to improve its environmental value and its use as a green corridor for people and wildlife.

There are already two funds in place for improving this link: £287k of S106 funds from a previous Harlequins development, which is sitting with the LBRuT and is due to time out in June 2015; and a land transfer with associated funding at the RFU site around 750m downstream. FORCE regards it as essential that the Council ensures these funds are invested so as to optimise the environmental and community benefit for this green corridor. Benefits would include:

- Widening and restoration, in a natural rolled Bredon gravel finish, of a DNR riverside pathway from Kneller Gardens to Mogden Lane. Note that it is not our objective for this pathway to be designed for dual walking and cycling use, as a wide pathway would inevitably lead to compromising the environmental value of the corridor
- Improved access to the DNR pathway from the A316
- Retention of the natural character and existing vegetation of the DNR channel and banks, including improved riverside habitat for water voles and kingfishers
- Management of the screening trees alongside the Depot and Stoop.

In addition, there would be value in the improved design and management of the open space to the rear of Challenge Court. This would include:

- An environmental management plan for the improvement and ongoing management of this space
- Improvements to the visual and physical linkage between the Challenge Court open space and the Craneford West and East Fields.

Whilst the funding may be largely in place to achieve these objectives there is not currently the impetus to deliver them. Consequently we seek assurances from the REEC partners that these benefits will be incorporated into the REEC development scheme and delivered alongside it.

A further requirement is that the building heights and massing of the REEC proposals avoid any overshadowing of the DNR or other key open spaces.

FORCE Objective Four – protection and enhancement of the environmental value and public access to Craneford West Field and East Field

These two fields constitute a significant proportion of the open space available to the public in this section of the lower Crane. The fields have been available for local public use for the last fifty years. The REEC proposals would result in a considerable increase in the demand for open space. It is therefore deemed essential by FORCE that full public access to these two fields is retained. This is supported in the TAAP p28 which pledges to: *“Enhance the open spaces of the Crane Corridor and manage them for environmental benefit as well as community use.”*

It follows that this would require a guarantee of no flood lights, artificial playing surfaces or fencing-off of playing areas on the East Field or West Field. In our view any of these measures would inevitably lead to reduced public access to these spaces. In addition, the provision of artificial surfaces or floodlights would compromise the value of the spaces as a night-time habitat for bats.

Given the significance of Craneford East Field as a proportion of lower Crane open space, in the event of compromise to the environmental value or public access to Craneford East Field, FORCE will seek provision of open space of equivalent environmental value with equivalent public access elsewhere in the lower Crane to balance the losses at Craneford East Field, supplemented by improvements to the environment and access of the new open space, as required and envisaged by CP12.

The footpath through Twickenham Junction Rough will go around the south side of the Marsh Farm allotments site and link with Marsh Farm Lane. There would be benefit from providing a second link, via a new footbridge, along the south side of Craneford East Field.

FORCE Objective Five – improvements within and around the Council Depot

It is not clear at present whether the Depot is to be part of the REEC development site, although we note that the Depot is earmarked for development in the council’s Site

Allocation Plan. The Depot sits adjacent to key routes along both the Crane and DNR, and any development at this site would provide an opportunity for local benefits such as:

- Widening of the access along the southern side of the Depot (Crane walk) to re-create the avenue that once ran along this walkway – and is currently curtailed by an ugly and graffiti-prone wall
- Widening of the access along the western side of the Depot (DNR walk) to improve the safety and value of this link as well as benefit the local riverside environment – it currently has its own concrete and graffiti-covered wall
- Opening up and improving the views at the southeast corner of the current Depot site – at present a dangerous corner for cyclists and pedestrians with a view of rubbish and untidiness
- Replacement of the current southern boundary wall with a more environmentally sympathetic boundary
- Public access and use of the Old Pump House (a building of historical interest and merit) and surrounds as part of any re-development.

FORCE Objective Six – improvements to pathways through the surrounding area

Marsh Farm Lane is an old pathway dating back at least two hundred years. It runs from south to north from the railway footbridge, between the Rifle Club and allotments, crossing the river and between the Craneford East and West Fields, before going along the western boundary of the REEC site and into the Harlequins site. This pathway is already used by students and local people as a walking route – but cannot be used easily for cycling due to its narrowness. There are various opportunities for improving this pathway including:

- Lowering the wall between Craneford West and East Fields, retaining the arches whilst creating a visual link between the two fields
- Improved access to and over the rail bridge, including provision of a cycle gutter and aesthetic improvements
- Improved access around the proposed new link into the POSO footpath
- Widening and landscaping of the path through the College site – including linking this path into any newly created green spaces within the College site.

The pathway through the POSO site and Twickenham Junction Rough is being delivered by the POSO development but may be influenced by the REEC proposals. FORCE has been consistent in its requests that this path should be:

- Relatively narrow, unlit and meandering, constructed from Bredon gravel and consistent with the ecological status of the site as a Site of Local Interest for Nature Conservation
- Not to be considered as a primary or sole route for students into or out of the College site.

FORCE Objective Seven – ongoing management of the open spaces

Inextricably linked with Objective One (the master plan for all of the open spaces in the lower Crane Valley), FORCE requires the establishment of fully resourced plans for the ongoing maintenance of all of the open spaces adjacent to the Crane. These will form an essential foundation for the establishment and sustainable maintenance of the enlarged Crane Park envisaged in 2005 SPG.

Note: it is assumed that all developments will include approved Sustainable Drainage Systems (SUDS) as base case – SUDS are not to be regarded as “environmental improvements.”

APPENDIX B:

Extract from Crane Valley Planning Guidelines, April 2005:

The Council will screen all applications for redevelopment within the framework area and determine if an Environmental Assessment (EA) is required (a screening assessment) under the Town and Country Planning Act (Environmental Impact Assessment) (England and Wales) Regulations 1999. The Environmental Assessment must include a non-technical summary. Further details on the implications of such regulations are contained in appendix 1 (not attached). A preliminary investigation has found that the main impacts to be considered are:

- *Impact on the River Crane, including surface water runoff, flooding and drainage;*
- *Impact on community facilities and public services, in particular school places and open space and sporting facilities;*
- *Impact on biodiversity*
- *Impact on the transport network, air quality and noise;*
- *Visual impact, especially of larger buildings;*
- *Impact of construction including use of materials and resources used;*
- *Impact on and protection and enhancement of the West London Green Chain.*