

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

4 February 2016

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**

**FRIENDS OF THE RIVER CRANE ENVIRONMENT RESPONSE TO REE
CASCADE PRACTICE LETTER, 06 November 2015**

On 8 January 2016, Mark Buxton of CgMs sent Friends of the River Crane Environment (“FORCE”) a copy of a letter dated 6 November 2015 sent to yourself from Anne Fairhead of REE Cascade Practice. Anne has written this letter “on behalf of Richmond upon Thames College to provide a formal response to the Friends of the River Crane (FORCE) consultation letter regarding the outline planning application (OPA) 15/3038/OUT.” The letter had not appeared on the London Borough of Richmond upon Thames (“LBRuT”) Planning website by 8 January 2016.

FORCE refutes many of the points raised in Anne Fairhead’s letter to you on behalf of the REEC. Our refutations follow the order of the points in the REEC letter.

Local Community Forum

FORCE rejects the REEC view that the Crane Valley Planning Guidelines “replace” references to the Crane Valley masterplan, and that therefore “a masterplan for the Crane Valley is no longer a priority for the Council.” FORCE’s view is that the masterplan and the Crane Valley Planning Guidelines are the same thing, representing recognition of the same need: the need for a Valley-wide approach. LB Richmond’s Local Plan policy CP12 covers the entire lower Crane valley. It is not site-specific, in contrast to the very site-specific approach which the REEC seeks to adopt.

FORCE stands behind the need for a masterplan approach. This would be more detailed than the Planning Guidelines. FORCE also maintains that the Planning Guidelines make this an issue for the REEC to address, not to evade and hand back to the Council.

In relation to FORCE’s “remaining three concerns” – the West London Green Chain, open space provision and deprivation in the lower Crane valley – we agree that these are referred to

in the places enumerated in the REEC letter, but we do not agree that these references show full consideration. The references do not evidence related mitigation, crucially do not evidence net environmental benefit, and do not address the issue of open-space deprivation in the lower Crane valley at all.

Policy Context of the OPA

It is not true that FORCE “states that the REEC proposals...do not make reference to environmental improvements” – clearly they do. Rather, FORCE’s contention is that the proposals do not demonstrate *net* environmental improvements. The proposals indeed simply do not address the question of whether or not the improvements offered outweigh the dis-benefits. Neither does the REEC letter. It merely lists a number of environmental improvements. But it does not attempt to address the “*net*” question. Unless the REEC proposals address this question, FORCE maintains that it is not possible to demonstrate that the proposals are in compliance with the obligations of CP12.A.

It seems clear to FORCE that the REEC is applying a different definition of “community value” to that understood by FORCE. The REEC contends that community value is increased by “increased formal recreation in the form of fenced sports pitches which will be available for community use.” FORCE contends that community value is considerably reduced by these measures: an asset which is currently freely available to the wider community without the requirement to make a reservation and pay a fee is superseded by an asset which is available only to those with the ability and willingness to pay for it. This is regressive.

Note that the evidence submitted by FORCE in support of our 2013 application for Village Green status for Craneford East Field demonstrated the wide range of genuine community use of this asset. Around 50 local families filled out detailed questionnaires setting out a wide range of local uses to which this field has been put for periods extending back at least fifty years.

The community is to be denied free access to this asset by fencing, and the community’s free access to Craneford West Field is to be compromised by greatly increased usage of the latter asset as a result of the REEC proposals. FORCE contends that the proposals need to demonstrate a *net* increase in community benefits, offsetting these denials and compromises, in order to comply with CP12.A.

The REEC state that the assurance of no lighting of the sports pitches on Craneford East Field “is also included as an obligation in the S106 Agreement.” FORCE has not seen the draft S106 Agreement, and would welcome sight of the obligations proposed therein. FORCE would also welcome LBRuT’s including the no-lighting assurance as a binding long-term condition of any approval of the application.

FORCE rejects the view that the A316 right-hand turn “improves access in the River Crane corridor.” The turn improves access to and from the REEC site, but not to the River Crane. Provision for the turn is not accompanied by any increase in the provision of public parking from which the River Crane could be accessed. Accordingly, the turn cannot be adduced as “in compliance with Policy CP12”. The turn has no relevance to CP12, except to the extent

that it encourages motorised traffic local to the Crane Valley, whereby it constitutes a minor environmental dis-benefit.

With reference to the Community Infrastructure Levy (“CIL”), FORCE welcomes the opportunities that the CIL may provide for increasing community benefits as a result of the REEC scheme. FORCE would welcome increased transparency as to the amount of CIL that will be generated by this scheme; and the approach that LBRuT proposes to take in dealing with CIL. FORCE would welcome dialogue with appropriate officers within LBRuT on the CIL process and opportunities.

Comments on specific aspects of the OPA

Overall planning strategy for the lower Crane Valley

FORCE rejects the Environmental Statement conclusion that “no significant adverse effect on the local transport network or the local environment in transport terms will result from the proposals.” FORCE considers that LBRuT’s insistence that the pathway (and associated verge) through the Twickenham Junction Rough should be five meters wide and provided with a bonded gravel surface is a direct consequence of the expected increase in pedestrian traffic on this pathway as a result of its proposed designation as the principal pedestrian access between the REEC and Twickenham Station. Ever since the opening up of this open space was proposed, FORCE has been consistent in its requests that this path should be relatively narrow, unlit, meandering and constructed with a loose, Bredon gravel surface, consistent with the ecological status of the site as a Site of Local Importance for Nature. LBRuT’s increased specification for the pathway appears to FORCE to be a direct significant adverse effect on the local transport network and the local environment in transport terms as a result of the REEC proposals.

River Crane naturalisation

FORCE does not agree that the REEC’s “contributing to the Environment Agency river restoration of the River Crane corridor... was agreed following extensive discussion with FORCE” nor that “This contribution was seen as positive by FORCE”. FORCE considers that the Environment Agency (“EA”) remit in this regard is much narrower than that of FORCE. Therefore the REEC’s decision to meet the EA’s remit does not mean that it meets the FORCE remit. Specifically, the EA has always indicated that it would be content with a feasibility study of river naturalisation, whereas FORCE has always sought practical, physical, demonstrable naturalisation measures “on the ground.” The amount of the REEC’s financial contribution to naturalisation was explicitly *not* agreed with FORCE, but negotiated pre-emptively between the REEC and the EA behind closed doors. Unless accompanied by significant practical naturalisation measures, FORCE regards the £50 000 negotiated by the EA as a totally inadequate contribution towards river naturalisation, considering the quantum of environmental disbenefits of the REEC development for the River Crane corridor.

FORCE is frustrated at the lack of specific proposals for naturalisation offered by the REEC. As far back as July 2014, at the very start of the REEC engagement process, FORCE tabled a very clear document, “Richmond Education and Enterprise Campus: FORCE objectives for environmental improvements,” setting out specific proposals. This document is attached to the present letter as Appendix A. The Crane Valley Partnership’s River Crane catchment

plan, cited in FORCE's 23 September 2015 consultation response also contains specific proposals. The vagueness of the latest REEC letter in this regard – “The contribution REEC will make via the CIL will *in part* go towards ‘River Crane network improvements’” ... “monies *can* be made available for *these improvements*” [author's emphasis] – is disappointing to say the least.

Craneford Way East and West Field

“the additional provision made by and within the proposed development (all weather sports pitches and new sports hall facilities)” will only be available to those who are in a position to book and pay for their use. In FORCE's view, this “additional provision” fails to compensate for the acknowledged reduction in “the current level of public access... particularly for recreational users”.

The REEC's argument that LBRuT “has more open space than any other Borough in London” is irrelevant to consideration of the net negative impacts of the REEC proposals for open-space availability in the vicinity of Craneford East and West Fields. The REEC's own Attachment 1 demonstrates the deprivation of open space within a 1.2km radius of the REEC site. Less than 0.5% of LBRuT's open space is situated within a 1.2km radius of the REEC site.

The REEC's statements about Kneller Gardens are irrelevant to consideration of the net negative impacts of the REEC proposals. Attachment 1 shows that this amenity is 1.4 km from the REEC site: this is outside the *Open Space Strategies Best Practice Guidance* standard of 400m and the spurious 800m-1km standard applied by the REEC. Moreover, extensive research by the Friends of Kneller Gardens and the biannual usage surveys undertaken by FORCE confirm that Kneller Gardens is already at capacity, particularly in terms of the use of children's facilities.

FORCE maintains that 400m is the relevant standard for consideration of access to green space, consistent with the *Open Space Strategies Best Practice Guidance*, because Craneford West Field is in the category of “Small Open Space,” for which 400m is specified as the relevant standard.

The findings of the socio-economic baseline assessment do not accord with reality in Craneford East and West Fields, so their validity must be questioned. There is a high student presence on both Fields, in particular during school hours. The notice in the children's play area in Craneford West Field, which states that no students are allowed in the playing area, is only there because of the student presence. FORCE maintains that this student (and secondary school pupil) presence in Craneford West Field will only increase if access to the East Field is restricted because of organised games during school hours and because of the need to lock access to the East Field to protect REEC revenue after school hours.

In relation to the impacts of the REEC development on local bat populations, FORCE notes that although the REEC letter challenges the FORCE evidence, the REEC's environmental consultants offer no objective evidence, analysis or even references to support their own assertions. FORCE challenges the REEC statement that “it is not considered likely that the loss of the amenity grassland will negatively impact bats to anything other than a negligible degree.” There is considerable research, of which the REEC's environmental consultants

should be aware, to indicate that when an area is more than 65% built over, a “tipping point” for the sustainability of bat populations is breached. See for example, James D Hale, Alison J Fairbrass, Thomas J Matthews, Gemma Davies and Jon P Sadler (2015), The ecological impact of city lighting scenarios: exploring gap crossing thresholds for urban bats, in *Global Change Biology*, John Wiley & Sons Ltd., 21, 2473. FORCE is concerned that the increased built-up footprint of the REEC development, including the artificial playing surfaces, could have non-linear consequences for local bat populations. FORCE is particularly concerned that the environmental consultants offer no positive measures for the encouragement of either Daubenton’s or brown long-eared bats, both of which have recently recorded presence in adjacent open spaces, but which will be further threatened by the additional lighting and loss of foraging caused by the REEC development. Finally, FORCE finds risible the implication of the REEC’s environmental consultants that bat populations benefit from “street lights as a food resource precisely because they draw invertebrates in.” Bats feed from streetlamps, at great risk to themselves, only because their natural environment is already so depleted of accessible food sources. It is a sign of a degraded environment, and FORCE expects LBRuT to use the opportunity posed by the REEC development to seek net environmental improvement.

Conclusion

FORCE trusts that LBRuT will take account of the points raised in our response to the REEC letter, in further deliberations concerning environmental benefits to be delivered from the REEC development.

Yours sincerely,

Gary Backler, Planning Trustee,
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.”