

Matthew Rees
Planning Officer
London Borough of Hounslow
Civic Centre
Lampton Road
Hounslow
TW3 4DN.

9 March 2016

Dear Mr Rees,

System Reference: SC/2016/0471

Planning Reference: 00315/E/SCOPE1:

Land at Rectory Farm, Cranford Lane, Hounslow, London

Environmental Impact Assessment Revision Scoping Report, 21 January 2016

Comments of Friends of the River Crane Environment (“FORCE”)

I submit the following comments on the above Report, on behalf of the Friends of the River Crane Environment (“FORCE”). Following a brief introduction to FORCE, these comments are structured according to the headings contained in section 5 of the Report, “Environmental topics.”

Introduction to FORCE

FORCE is an environmental and community based charity, founded in 2003 and with over 500 members, most of whom are local within the London Boroughs of Richmond upon Thames and Hounslow. 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 and the Duke of Northumberland’s River. More information on our organisation can be found at www.force.org.uk

The Rectory Farm site is a very important location for FORCE, as it is:

- approximately 500m to the east of the River Crane at its closest point
- approximately 250m to the south east of Cranford Park, a key open space in the Crane Valley
- a significant component of the local Green Belt, at 44 hectares
- approximately 1km east of Heathrow Airport, where air quality is a significant consideration in runway expansion.

Accordingly, sensitive development of the site is important both locally and for the wider environment of west London.

It is against this background that FORCE submits the following comments.

Comments on Revision Scoping Report

Landscape and Visual: FORCE’s primary concern is with this aspect of the Report. FORCE shares the concern of the London Borough of Hounslow (“LBH”), expressed

at the previous application, that any development of the site should be appropriate to the Green Belt character of the site. This Green Belt character is already under pressure from the cumulative impacts of warehouse developments that have taken place on adjacent sites since the previous application. These make the Rectory Farm site particularly valuable in terms of its Green Belt character. FORCE would expect any development of the site to respect this character.

FORCE welcomes the commitment that, prior to commencing the development, the 44-hectare site will be secured and opened up for public access, and that once completed, the site will be designed as a new parkland for Hounslow and West London. In particular, FORCE supports the approach of providing a park within the first phase of the development, and developing the parkland over time, in parallel with the mineral extraction and creation of below ground storage areas.

FORCE also supports the emphasis of the Revision Report on improving connectivity between the new park and the surrounding communities. FORCE believes that the new park could be more effectively promoted as a “landscape destination” if it is promoted as a part of the overall landscape amenities and open spaces of the Crane Valley. The connectivity of the Crane Valley in this vicinity is severely compromised by the successive crossings of the A4, A30 and A312 in close proximity, so it would help to improve the connectivity of the new park by improving all of these crossings. The design and routing of cycleways and pedestrian pathways and integrated signage will all be important in promoting connectivity. For example, signage at the pedestrian footbridge across the A312 northwest of High Street Cranford, in conjunction with a new direct pedestrian and cycle access into the east side of Avenue Park, would underpin connectivity between the new Rectory Farm park, the existing open spaces of Avenue Park and Cranford Park, and the River Crane corridor.

Within the new park, FORCE would support the provision of meandering routes with Bredon-gravel surfaces for mixed-use pathways. FORCE would be opposed to any lighting of these paths or of other park amenities: the park forms a dark oasis in heavily lit surroundings (A4, A312, Heathrow Airport). FORCE would be opposed to the use of artificial playing surfaces, fencing and floodlighting of any formal sports fields.

Traffic: FORCE supports measures to promote sustainable travel to the new park, both as a landscape destination and as one site along the wider Green Corridor of which the Crane Valley is a part. FORCE would seek improvements to cycling links and signage to Avenue Park, Cranford Park and the Crane Valley as well as to local amenities.

Air quality: FORCE is concerned that excessive dust during both construction and operation of the extraction facility could have an adverse impact on both wildlife and vegetation in the site. Generated traffic will also have an adverse impact on air quality, which is already poor in this area.

FORCE believes that a landscaped park with appropriate planting and management could contribute positively to improvement in air quality. FORCE would welcome

involvement in the detailed design and planning of landscaping, planting and site management.

Noise: FORCE is concerned that ambient noise levels will be increased by construction and operation of the extraction facility. FORCE would expect reasonable measures to be taken to mitigate these increases. FORCE is particularly concerned that measures be taken to ensure that there is no net increase in ambient noise levels during the hours of curfew at Heathrow Airport.

Cultural Heritage: FORCE welcomes the proposed archaeological trial trenching survey. In the event of significant findings therefrom, FORCE would welcome involvement in consideration of measures to promote the findings as one element of increasing the attractiveness and interest of the open space for the public.

Ground Conditions: FORCE is deeply concerned to ensure that there should be no contamination of groundwater from construction or operation of the facility, and in particular to ensure that if there is any such contamination, it should not impact on the River Crane or its catchment.

FORCE supports the application of sustainable design and sustainable urban drainage systems in this development.

Hydrology: FORCE supports the use of more up-to-date water quality data on the River Crane. FORCE is involved, as a member of the Crane Valley Partnership, in monitoring and in practical measures upstream of Rectory Farm to improve water quality as part of the Crane Valley Water Framework Directive Catchment Plan.

Ecology: FORCE notes that the 2015 surveys appear to have shown a reduced potential for the site to support biodiversity since the 2012 survey, as a result of further denuding due to increased grazing by ponies and horses, as well as other activities in the nongrazed areas. FORCE would be concerned if this reduced potential were to be regarded as a new baseline. FORCE strongly supports Policy GB7 – Biodiversity under Objective 5 within the new LBH Local Plan, which aims to protect and enhance LBH’s natural environment and increase the quantity and quality of the borough’s biodiversity. FORCE believes that creation of the new park provides a significant opportunity to promote improved biodiversity through positive interventions and considered management measures.

Waste: FORCE has no comments on this aspect.

Socio-economics: FORCE has no comments on this aspect.

Yours faithfully,

Gary Backler,
Planning Trustee, Friends of the River Crane Environment