

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

April 2019

Dear Ms Simpson,

**PLANNING APPLICATION NUMBER: 19/0646/FUL**

**GREGG'S GOULD ROAD, TWICKENHAM TW2 6RT**

**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 proposed redevelopment of the former Gregg's production site. This response contains:

1. Background to FORCE
2. The planning policy context of this application
3. Comments on specific aspects of this application
4. FORCE aspirations arising from this development
5. Conclusion.

As a result of a number of concerns with the application this response constitutes an **Objection** to the proposals.

**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 organization, operating in the Crane Valley for the past sixteen years, and we have a membership of nearly 600, most of whom are residents of the lower Crane Valley.

The site of the proposed development is bounded on its north side by the River Crane, with a frontage of over 100 metres directly onto the river. The site is clearly visible from its nearest public open space, Craneford West Field, and from the well-used public pathway across the south side of the Council Depot. Accordingly, the site is of significant interest to FORCE, and has significant potential environmental implications for the lower Crane.

Moreover, the proposed development represents the first significant change of use of the site in over 60 years. FORCE believes that this once-in-two-generations opportunity of transformative change should be extended to the adjacent environment also, and that this opportunity to achieve environmental improvements should be embraced as an intrinsic feature of the development.

FORCE is pleased to have a track record of working constructively with LBRuT over many years and we have been working closely with LBRuT for several years on a number of projects that are immediately adjacent to the former Gregg's development. We are submitting this formal response with the intention of ensuring that the design and implementation of the scheme for the Gregg's site has the best possible interface with these projects.

## **2 The planning policy context of this application**

LBRuT's own planning policies set the context within which this application is evaluated. In the Local Plan of July 2018, "LP18 River Corridors" is particularly relevant to this proposal, including specifically:

- LP 18A "Development adjacent to the river corridors will be expected to contribute to improvements and enhancements to the river environment."
- LP 18C (c) "There is an expectation that all major development proposals adjacent to the borough's rivers shall provide public access to the riverside."
- "Where appropriate, developments alongside and adjacent to the River Crane should contribute to the overarching aim of creating a new metropolitan park that provides a continuous, accessible link between Hounslow Heath and the River Thames, incorporating river restoration works along the lower Crane, including a long distance footpath, improved access for surrounding communities and an enhanced wildlife corridor." The Gregg's site is explicitly cited as such an appropriate development.
- 5.7.10 "all major development proposals adjacent to the borough's rivers should provide through-site links to the riverside to enable the public access to the riverside environment."

FORCE notes that the Planning policy context in the developer's *Design and Access Strategy* ("DAS" 2.14, p28) for this development makes no reference to LP 18. Given the 100 metre site frontage onto the River Crane this is both surprising and concerning.

Other policies are also relevant, including LP 5 Views and Vistas, LP 12 Green Infrastructure, LP 15 Biodiversity and LP 16 Trees, Woodland and Landscape.

FORCE notes that in relation to the provision of affordable housing on the former Gregg's factory site, LBRuT is being invited to waive the requirement of LP 36B (a) that "on all former employment sites *at least* 50% on-site provision. Where possible, a greater proportion than 50% affordable housing on individual sites should be achieved." This on the usual grounds of "subject to viability," when the developer will be the beneficiary of producer surplus due to the proximity of the development to river frontage and open-space vistas.

We can see no reason for any relaxation of any of LBRuT's environmental policies with respect to this development.

### **3 Comments on specific aspects of this application**

FORCE has comments on the following specific aspects:

- The design of the housing proposals
- The likely impact of the proposals on adjacent public open spaces
- The proposed riverside walkway
- The proposed commercial development
- Construction impacts of the proposals.

#### **3.1 The design of the housing proposals**

FORCE notes the proposal to build 116 housing units. This raises concerns in relation to:

- Visual and shadow impacts
- Noise and light impacts
- Sewerage impacts
- Litter impacts.

##### Visual and shadow impacts

FORCE notes that the current site is made up of three main factory buildings ranging from 1-2 storeys and a single-storey office building fronting the River Crane (*Demolition & Construction Management Plan*, p3). Against the current profile, the proposed development, comprising 3-5 storey residential units, will be highly visually

intrusive. Adjacent housing has a maximum height of three storeys so this development will stand out markedly against the prevailing roof line. FORCE objects to any development which raises the roof line above the current profile, and believes the opportunity should be taken to lower the roof line where possible to open up light and sightlines to the river and open spaces on the opposite bank of the Crane. The Lockthorp House scheme must not set a standard for 5-storey development along the River Crane (*DAS*, p44).

FORCE also notes that the developer intends to maximise the profits it derives from the borough's public assets, by locating two 5-storey blocks of housing adjacent to the river with views over the river and open spaces. We note with particular concern that these would replace the single-storey office building which currently overlooks the Crane. FORCE objects to building 5-storey blocks on a site which has hitherto only accommodated 1-2 storeys. We particularly object to the proposal to locate the two tallest blocks of residential development adjacent to the River Crane, and to the "design principle" of locating "Larger building footprints towards the river and railway edge" (*DAS*, p34). Concerns include:

- Overshadowing of the river corridor – particularly given the development is directly to the south of the river and will cast a significant physical shadow into the corridor, reducing its environmental potential. Note in this context that – although the river is currently in a concrete channel (a) it retains habitat value – including for fish and kingfishers for example and (b) there are plans, in partnership with LB Richmond, the Environment Agency and others, to significantly enhance the environmental value of this corridor through the Lower Crane River Restoration project
- Light pollution into the corridor. Large accommodation blocks adjacent to the river will inevitably lead to extensive light pollution along what is currently a dark corridor used extensively by bats
- Noise pollution into the corridor

In addition to the shadowing and intrusion of the proposed development onto the river, we are also concerned that this proposed massing will cause visual intrusion to public users of Craneford West Field, the Depot pathway and Mereway Nature Reserve. In the context of Local Plan Policy LP5, we are conscious of the impact of any site development on the views and vistas from these public locations, given the value and rarity of open space and sky in this vicinity. The selection of vistas 5 and 6 in 2.13 of the *DAS* appears particularly calculated to minimise the apparent visual intrusion of the proposed development: for example, the development will be a good deal more evident from the pathway across the south side of Craneford West Field than from the north east corner of the field where the photograph was taken. We ask that the development be reduced in scale to match the existing roof line.

The *Daylight, Sunlight and Overshadowing Report* addresses only those impacts on adjacent properties to the west, south and east. Yet this development represents an opportunity to alleviate the shadowing of the river caused by the factory's contiguity with the south bank of the Crane. The 8-metre setback required by the Council and the Environment Agency offers the scope for some improvement, and we recognise the further setting back of proposed car parking and the building line (*DAS*, p39). However, this improvement should not be negated by raising the mass of the set-back residential blocks from 1-2 storeys to 3-5 storeys.

#### Noise and light impacts

The stretch of the lower Crane Valley from Meadway in the west to Brewery Wharf in the east has particular ecological value as a dark corridor. FORCE and others have undertaken bat monitoring over several years which has confirmed this value. Throughout its years of operation, the Gregg's factory supported this value as it contributed minimal light spillage into the corridor. We are concerned that the proposed development – in particular the 5-storey blocks facing the river – will increase light spillage into the corridor.

FORCE has carried out with others several detailed bat surveys over the last five years and these can be found on the wildlife section of our web-site. These surveys show that the Lower Crane and Duke's River corridors are important habitats for bats and these habitats require statutory protection.

We consider that the proposed "use of lighting [to] provide a striking and ambient landscape in the evening" (*DAS*, p85) is potentially in stark contrast to the council objectives (and statutory requirements) for the retention and protection of dark corridors. We insist that any lighting on the site must contribute no light pollution into the dark river corridor. In particular, we are strongly opposed to the low lighting and tree up-lighting that are proposed – in addition to bollard lighting – for the riverside walkway (*DAS* p103). This is completely out of character with the dark corridor and would interfere with the corridor's value for roosting birds, bats and other nocturnal fauna – as well as having a negative impact on one of the few dark parts of Twickenham and being a questionable use of energy resources.

We expect the proposed development to minimise noise and light pollution into the corridor, through the provision of insulating glass in windows facing the river and the elimination of lighting of the proposed balconies overlooking the river. We also expect the lighting for the proposed new road layout, and security lighting around the site, to be specified to a standard which minimises light pollution. We are also very concerned by the "Secured by Design" recommendation that "There needs to be sufficient lighting towards the riverside to prevent loitering" (*DAS* p47). This is a further indicator of the potential negative impacts of lighting on the dark corridor as a result of the development as it is currently envisaged. We expect the developer to provide appropriate planting and vegetation screening along its river frontage to

enhance insulation from noise and light impacts, whilst also ensuring that sunlight is still able to penetrate the corridor.

In summary we object strongly to the lighting proposals for the scheme. We consider that the development proposals fail to appreciate the importance and value of the night time river corridor and would have a major negative impact upon it.

#### Sewerage impacts

FORCE notes the proposal that all drainage of the site will be conducted through the main sewerage system. It is our experience that the main sewerage system is easily overwhelmed, particularly in times of sudden heavy rainfall which leads to rapid run-off. This sensitivity, particularly linked with the deployment in parts of the network of combined sewage outfalls that mix sewage and rainfall drainage, results not infrequently in raw sewage discharge into the River Crane and the Thames.

FORCE notes that since the early 2000s, the local sewerage system has already been required to accommodate incremental sewage volumes from developments at Challenge Court, the Hamilton Road sub-station and Brewery Wharf. In the next few years the local sewerage system will be expected to accommodate the incremental sewage volumes from the developments at Twickenham Station, the Richmond Educational and Enterprise Campus ("REEC") and the future Stoop development, as well as those from this proposed development. Yet the capacity of the sewer network is not being increased. These incremental pressures are likely to result in non-marginal implications for river pollution in times of high rainfall in the future.

FORCE would expect the developer to provide permeable surfaces wherever feasible throughout the site, in particular in proposed car-parking locations. We also expect the developer to provide for rain water recycling in its residential and commercial units.

#### Litter impacts

The opening up of the river frontage to a public walkway and the location of 116 residential units with direct access to the river greatly increases the risk of litter ingress into the Crane. FORCE is particularly concerned that unmanaged litter from this new population would spill over into the river and thence into the Thames and marine environments. We expect the developer to provide appropriate litter bins and arrangements for litter management on its site, in conjunction with LBRuT.

### **3.2 The likely impact of the proposals on adjacent public open spaces**

The proposed residential development is likely to accommodate a population of up to 400 residents, likely oriented towards families. FORCE notes that the play space and community space proposed for this development is very small in relation to the amount of housing that is being proposed for the site. The provision of such

minimalist play space of course permits the developer to maximise its provision of housing, and its profits.

FORCE rejects the assertion – convenient for the developer – that;

*“there is sufficient play space for 5+ year olds in the surrounding area. It is therefore proposed that play space for 5-12+ year olds will be accommodated within the Parks and Greens listed below” (DAS, p98).*

The list includes Crane Park and Radnor Gardens, which are 10 to 20 minutes’ walk away, and Twickenham Green, which requires crossing the A305. Clearly, 5+ year olds are not going to be using these play spaces without significant adult supervision. Instead, although the *DAS* does not acknowledge it, the developer is relying on the vast majority of the children’s play needs being met by the existing public spaces of Kneller Gardens, Mereway Nature Park and Craneford West Field (“Craneford Way Recreational Park”).

FORCE seeks greater provision of community space on the site, even at the expense of a reduction in the number of housing units built, in order to ensure that the site is more self-sufficient in terms of its impact on adjacent open spaces. Unless this disequilibrium between the number of housing units and the area of play space is rebalanced, the increased population will impose significantly increased pressures on those adjacent open spaces which are free to the public to access. In particular, the proposal will impact:

- Craneford West Field and Kneller Gardens
- Twickenham Junction Rough
- Mereway Nature Park.

#### Craneford West Field and Kneller Gardens

These already improved open spaces will be the nearest public green spaces available to the new population. Craneford West Field is already used intensively by local residents. In 2013 Richmond College defeated a Village Green application to maintain unfettered public access to Craneford East Field, and quickly asserted its ownership rights, thus concentrating residents’ usage on the public West Field. Within the next year the large part of that field will be fenced off from public use.

IN the last year 200 new housing units have opened at Brewery Wharf, the construction of 200 more housing units is progressing as part of the Twickenham Station redevelopment, 180 housing units have been approved for the REEC site and now 116 more housing units are proposed for this site. Harlequins FC is also preparing a proposal for development of The Stoop site which may include a residential component.

Craneford West Field and Kneller Gardens will constitute the nearest significant green spaces available to the population of all of this housing, free of charge, without crossing a major road (with the exception of Moor Mead Park for Station residents once the proposed footpath has opened in 2020). Kneller Gardens provides the only refreshment and toilet facilities in the entire lower Crane Valley, so will prove particularly attractive for families in these new residential developments.

Also since the defeat of the Village Green application, Richard Reynolds School has opened. Prior to opening, the school built over its own playing fields, and now uses Craneford West Field for some of its games activities. Moreover, Harlequins FC continues to use Craneford West Field for a number of training and mini-rugby events. In the meantime, usage of these spaces by existing residents has continued to increase as the quality and linkages between the spaces have been improved over the past 15 years.

In this context, FORCE notes with concern the minimal on-site play space proposed for this development. It is not clear how the play demands of children aged 0-5 and 5-15 will be accommodated. The only public spaces for these children to go, along with the 3,000 FTE College students and 750 secondary school students before and after classes, are Craneford West Field, which will suffer the penalty of proximity, and Kneller Gardens, where College students already use the café and meet friends from Waldegrave School.

All of this development evidences the significant probability of over-use of Craneford West Field and Kneller Gardens. FORCE surveys of the usage of Kneller Gardens, which remain available to the developers and the Council, 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 this proposed 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.

#### Twickenham Junction Rough ("TJR")

This site is the next nearest open space which can be accessed without crossing a major road. The site has been open to the public for less than a year. It is designated a Site of Local Importance for Nature Conservation ("SLINC"). FORCE usage surveys show that the new public pathway through the site is already heavily used, with some 650 people each weekday availing themselves of the new environment. This pathway will be a principal route of pedestrians and cyclists from the new housing development into Twickenham town centre, for retail and station access. This is consistent with Council policies to deter vehicle traffic and improve air quality in the town centre.

FORCE is aware that the increase in usage of the TJR pathway from residents of the new development, combined with the increased usage consequent on the REEC's intention that the pathway provide the principal route to the College site, as well as future increased usage from residents of the Twickenham Station and Harlequins developments, will risk changing the character of the new TJR open space, and compromise its value as a SLINC.

### Mereway Nature Park

This site is also accessible without crossing a major road. The character of the nature park also risks being compromised by the steadily increasing demand from the proposed development, coming, as it will, on top of increased numbers from the REEC (and possibly the Harlequins) developments.

### **3.3 The proposed riverside walkway**

FORCE notes that the proposal includes provision of a riverside walkway. At a basic level, this is no more than a recognition of the Council's and Environment Agency's requirement that development adjacent to water courses must provide an 8-metre strip between the development and the edge of the water course. The riverside walkway will in any case provide significant benefit to the residents of the new development, and the developer will capture this benefit in the prices that it realises for the sale of its properties. So FORCE does not score this as a net environmental benefit of the development. The walkway should incorporate provision of access into the river for periodic litter clearance.

FORCE supports the concept of the riverside walkway in principle. The walkway should be clearly signed from adjacent streets as a public pathway, and it must remain fully and freely accessible to the general public at all times in order to register as a benefit to the wider community. Even then, since the walkway will be at the end of a cul-de-sac, it is likely that very few of the general public will choose to avail themselves of it – it leads nowhere – so the wider community benefit will inevitably be very limited.

FORCE does not see any great value in a new bridge linking the new walkway to the north bank of the Crane (*DAS*, p54). It is unlikely to be much used by the wider public, and the infrastructure spend would be much better invested in delivering outputs from the Lower River Crane Restoration Vision (see also 4.1 below). The proposed riverside boardwalk and viewing platform (*DAS* p95) is not a priority of FORCE and we are concerned that it would provide a venue for night time activities that could further disturb the night corridor as well as being a source of litter into the river. Any proposal of this nature should also be entirely compatible with the developments proposed in the Lower River Crane Restoration Vision, and must in no circumstances be allowed to frustrate the Restoration Vision.

FORCE notes the Secured by Design recommendation for passive provision of powered gates at the entrance to the site, but we strongly oppose the gating of access to the riverside walkway. Our usage surveys of the Twickenham Junction Rough pathway show that the gating of this pathway is a significant deterrent to its usage, and our experience is that the gating arrangements are prone to break down, particularly on public holidays. Any gating is also clearly at odds with any wider community value of the provision.

### **3.4 The proposed commercial development**

FORCE notes that the proposed commercial development appears to be confined to the provision of a single building of 175m<sup>2</sup> footprint at the southern entrance to the site. The developer is thus maximising its benefit from the change-of-use designation by providing intensive residential accommodation on the rest of the site. It is not clear where vehicles associated with any future commercial operation will park.

### **3.5 Construction impacts of the proposals**

FORCE notes that the *Demolition & Construction Plan* makes no reference to issues specific to working on a riverbank. We would like an assurance that the developer will clear up immediately any building materials or rubbish arising from the construction that are deposited in the river. The developer should be explicitly obliged to undertake a final clearance of the river along and downstream of its 100-metre frontage prior to opening of the site for residential occupation.

We note with particular concern the proposal to locate the Material & Skip Storage Compound on the riverbank and envisage this could be a prime source of wind blow litter into the river.

FORCE expects further surveys of bats and nesting birds to be undertaken (*2018 Extended Phase I Habitat Survey Report*, p5). We note that the *Demolition & Construction Plan* states that “If a bat is observed during the building demolition, works must stop immediately” and that “replacement roosts may...be needed” (para. 4.6.2). FORCE would like to see additional bat roosts mandated, as an offset against any potential loss of roosts caused by factory demolition.

FORCE notes that Meadway is proposed as a Construction Delivery Route. Our usage surveys show that over 600 people per day cross Meadway between Crane Park and Kneller Gardens during the proposed construction hours, and over 20% of these are children.

### **3.6 Traffic and Parking**

FORCE envisages this will be a major issue for local residents. Our remit does not normally extend to traffic and parking issues unless they impact upon the value of the open spaces. In this case the key issues for FORCE and the Crane valley would be:

- Parking local to Kneller Gardens: this is already a significant issue following the extension of local parking zones – leading to some elderly and disable people no longer being able to use the park
- Traffic and the Meadway crossing: as identified above, this crossing is a significant safety risk for users of the lower Crane corridor. Increased parking and traffic pressures, together with more local residents, will further increase this risk

#### **4 FORCE aspirations arising from this development**

Given the incremental pressures that any housing development on this site will impose on the environment of the lower Crane valley, given that the developer is potentially profiting from the waiver of provision of 50% affordable housing, and given that the developer will profit from the contiguity of the development to the River Crane, FORCE expects the developer to make a significant financial contribution towards benefitting the river environment from which it derives this incremental profit, and towards minimising the negative impacts of the development. Only in this way can the development comply with its obligation to provide net environmental benefits in the lower Crane valley.

FORCE would have a number of aspirations arising from any development of this site. Improvement to the river corridor along its 100-metre length through the proposed development would provide some local benefit, although this would be tempered by the construction impacts of the development and by longer term increased riverside disturbance. Our main expectation from any site development would therefore be for it to support local off-site benefit to the environmental and community value of the adjacent river corridor. Such off-site benefits would clearly also benefit residents of the new development and can be marketed accordingly, and the developer would capture this benefit in increased prices of its new residential units.

We have identified the following as two main areas of focus:

- Improvements to the River Crane corridor
- Improvements to adjacent public open spaces.

##### **4.1 Improvements to the River Crane corridor**

FORCE welcomes the developer's recognition in its *DAS* (2.10) of The Lower River Crane Restoration Vision. This provides a practical framework within which any improvements to the lower Crane should be planned and undertaken. The vision for improving the Lower Crane between Mereway Road weir and the tidal reaches in Isleworth was produced in late 2017. A feasibility study, undertaken by Atkins, has recently been completed in draft and is due to be published in the next few weeks. This document sets out costed proposals for naturalisation options, including in-stream improvements along the entire 3km length of the river, with major restoration

works at five locations, including the Mereway and Craneford Fields sites most local to the proposed development. The vision can be seen on the Crane Valley Partnership website [www.cranevalley.org.uk](http://www.cranevalley.org.uk). And the feasibility study is currently available to the project steering group (including LB Richmond and The Environment Agency) and is due to be put into the public domain in the very near future.

FORCE envisages this project as fitting well with the developer's objectives for the former Gregg's site, and improvements to the local river corridor would be a major benefit to both existing and new residents. It would be eminently sensible for the developer to engage with this larger-scale restoration project and ensure that its improvements contributed to delivery of the larger-scale project. We see "*the great opportunity for the application at the Gregg's Bakery site to integrate the elements of the overall Lower River Crane Restoration Vision in the design*" as a condition for the development, not a matter of "*Ultimately.*"

We would of course support efforts to link the proposed riverside walkway to any wider access along the southern bank of the river, but given that the riverbank to the west of the new development as far as Mereway Road is in private ownership, this is likely to be a longer term aspiration.

#### **4.2 Improvements to adjacent public open spaces**

There is a wide range of improvement needs, to which this development, given the above identified pressures which it will impose on the open spaces, should be expected to contribute. These include:

- Integration of Craneford West Field with Challenge Court "Meadow"
- Marsh Farm Lane improvements
- Craneford Way pavement
- Duke's River path at the A316 crossing
- Kneller Gardens
- Richmond Green Gym.

The opportunity to integrate Craneford West Field and the Challenge Court Meadow" FORCE considers there is a major opportunity to improve the access into and public use of the large open space north of Craneford Way between the college and Harlequins sites. This is linked to the college improvement plans for Marsh Farm Lane through the college site and could also include traffic calming measures along Craneford Way itself. Enhancing this space will be of particular value given the significant loss of other public open space and the large increase in use forecast for the remaining spaces, as noted above. It is a major opportunity for this development, along with the proposed REEC housing development, to trigger implementation of improved integration of the two open spaces.

FORCE believes that the Gregg's development should only be approved with significant assurances of appropriate remedial measures against the impacts of the increased usage of the spaces that the development will cause. Such measures could include for example a long-term commitment to fund the management, maintenance and litter clearance of Craneford West Field and the Marsh Farm Lane pathway.

#### Marsh Farm Lane improvements

Marsh Farm Lane is an old pathway dating back at least two hundred years. The council has already improved the condition of Marsh Farm Lane on the south side of the River Crane where it joins with the bridge over the railway and the new TJR pathway. The college is planning to improve the lane as it passes alongside Craneford Fields, also linking to the newly created pathway along the south side of Craneford West Field. These two schemes need to work together to optimise the movement of pedestrians and cyclists and to preserve and enhance the local environment, including local historic features such as the flood arches beneath the brick wall on this site. There is also potential for further environmental enhancement to the triangle on the western side of Marsh Farm Lane, and the Council needs to make provision for regular litter clearance here. This is a regular hotspot for litter, and will set a very poor example to College and school students if litter is left to accumulate.

#### The Craneford Way pavement along the College Playing Field and Marsh Farm Lane crossing of Craneford Way

FORCE has been concerned for some time about public safety in these areas due to the very narrow pavement and the risks for people crossing from the lane and from the children's playground. The Gregg's housing proposal provides an opportunity to review and reduce these risks. The council are also looking at how interface issues between College students and residents' children can be improved along the land area within their control including the West Field and playground area. FORCE believes that as a condition of approval for this application, the developer could be obliged to fund the provision of further play equipment in both the Craneford West Field and Kneller Gardens playgrounds, as children from the new housing development will be major beneficiaries of this equipment and will otherwise be "free-riding" on the public investment that has already been made in these facilities.

#### The Duke's River path and its interface with the new junction proposed between Langhorn Drive and the A316

The Duke's River path has been improved considerably over the last couple of years in a project supported by LBRuT, FORCE and others, and is now used by several hundred people per day. The pathway crosses Langhorn Drive at the proposed site of the new college junction. The path is likely to form a principal amenity for residents of the Gregg's development, and they will benefit from improvement to the Duke's River path crossing.

FORCE considers that the developer could contribute long-term funding for litter clearance and maintenance at this pathway crossing. The developer should also be obliged to contribute to funding signage and interpretation to emphasise the link between the existing Duke's River pathway and the new crossing.

#### Kneller Gardens

The Friends of Kneller Gardens are currently finalising the costs and associated planning needs for improving the pavilion on this site. It will provide the nearest toilets and refreshment facilities for residents of the new development who use the adjacent open spaces.

#### Richmond Green Gym

This weekly volunteering scheme is based in Kneller Gardens. The Green Gym team undertake environmental improvements to local open spaces whilst also providing targeted health benefits to the participants. It has been operating for over two years and has had a significant cumulative benefit to the Mereway Nature Park and Meadway Orchard sites in particular. The scheme is likely to require a year's further funding from September 2019 to be sustainable, and residents from the Gregg's development will benefit from the proximity of these quality open spaces.

### **5 Conclusions**

FORCE objects to this proposal as we view it as deficient in terms of its approach to the community and environmental value of the Crane valley as follows:

- The building heights have a detrimental visual impact on the open spaces along the Crane valley
- The development proposed has a detrimental impact on the environmental value of the river corridor in terms of lighting, noise, shading and littering for example. No significant consideration appears to have been given to these factors in the proposal – over and above a statutory requirement to leave an 8m undeveloped corridor - nor the planning policy LP 18 on River Corridors. Given the site location and the 100 metres of river frontage this seems extra-ordinary.
- The development would lead to further pressures on existing local environmental and community open space assets along the river corridor. There is no provision to mitigate these impacts in the proposals
- The development proposals give no firm commitment to support the aspirations of the Lower Crane Restoration project – again, given its central location within the project area this is not acceptable

Please note that FORCE is only responding on matters within our Charitable Objects – and we have not considered other planning and related transport and public realm matters.

FORCE would welcome the opportunity for discussion of all matters raised with the developers and relevant council staff.

Yours sincerely,

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