

## **Planning Application 15/1691/FUL Response by FORCE**

The Friends of the River Crane Environment (FORCE) is a local environmental and community charity, set up in 2003 and with over 500 members. FORCE has a keen interest in both the Crane and the Duke of Northumberland's River (DNR) corridors. We are responding to this application as it has an impact upon the DNR corridor.

FORCE is objecting to this application on the following grounds:

1. FORCE has had a key involvement in the DNR over many years and is the main local community group with such an involvement. FORCE was an active party to previous applications by the RFU along this corridor and has met with the RFU and council to discuss issues along the corridor on many occasions. FORCE was also a key supportive party to the previous RFU planning application for this site 13/2130/FUL. The history of this involvement is set out in more detail in the letter to the Council leader and CEO copied below as Appendix A.

Despite this involvement the RFU has not at any time mentioned this proposal to FORCE and neither the RFU nor the Council planners informed FORCE about the application when it was submitted. As a result we have not had sufficient time to respond to this application as we would wish and we consider this to be contrary to the requirements of the planning legislation.

2. The failure to contact FORCE before or at the point of this application has meant that we have not been able to fully evaluate this application or consider properly the community and environmental impacts of it.
3. The part of the proposal to which we have prime objection seeks in essence to remove the public benefits of a previous application 13/2130/FUL. The development under this application has been built out and the benefits; to include setting back the fence for more public access, landscaping and a new green wall; have not been implemented. FORCE was supportive of the application due to these benefits – key to these being the setting back of the fence - and without them we would have objected to it.
4. The reasons given for the proposal are based on security. However, the need for security was known at the time of the previous application and could therefore have been built into this. Instead, the previous development was placed very close to the fence line with the public space.
5. The proposal includes a new fence along the entire length of the RFU boundary with the DNR. This boundary already creates a very narrow and oppressive pathway along this part of the Duke's River walk and we have approached the RFU on a number of occasions with a view to creating a safer and more pleasant environment along this corridor – but to no avail. Reviewing the security along this margin provides an ideal opportunity to also improve the public realm and environment along this corridor – and this opportunity is not being taken.
6. There is no consideration of the environmental or community impact of the proposals in the application. We note in particular that water voles are present in the adjoining river bank and bats are present in the corridor.

E-mail correspondence from FORCE on 16<sup>th</sup> June 2015

Dear Ms Norton and Cllr Lord True,

I am writing to express FORCE's deep concern regarding RFU actions in relation to the Duke of Northumberland's River (DNR). In 2013 we were contacted by the RFU in advance of a planning application to build new infrastructure adjacent to the DNR pathway. The proposal included an agreement to set back the fencing along the length of the development with associated landscaping and a green wall. The widening of the DNR pathway along the RFU boundary has been a long term objective of ours, so we spoke in support of the application in principle when it went to planning committee in 2014, and the scheme subsequently received permission.

Later in 2014 we identified the London Mayor's Big Green Fund as an opportunity to improve the DNR and developed a proposal with support from LB Richmond, LB Hounslow and the Environment Agency. The RFU World Cup 2015 team approached FORCE around the same time with a project to create four new carved benches with local Richmond and Hounslow schools, display these around the ground during the World Cup and subsequently put them along the DNR as a permanent feature. Accordingly we put this into the Mayor's application as one of the match funding elements.

In March this year we heard of our success with the Big Green Fund project and the project itself is now up and running under the management of LB Richmond and with a total funding pot of over £400,000. We had not heard back from the RFU however, despite several contact attempts, until last month when new WC 2015 representatives requested a meeting. This revealed they had no awareness of the benches project and no clarity around how it might proceed. As a result we felt we had to cancel that project as we had no confidence that the funding would be in place in time and did not wish to further disappoint the local schools we had already engaged with.

It turned out that the main purpose of the WC 2015 meeting, from their perspective, was sounding us out on the potential to close off public access along the DNR completely for the duration of the World Cup. We were not supportive of this proposal. Whilst at this meeting however we also requested an update on the progress of the previous planning application. We had seen that the works on site were largely complete, and the old fence had been removed as required - but a temporary heras fence had been put in its place and no progress had been made on the landscaping or green wall elements. The WC 2015 team did not know about this scheme and agreed to enquire about it.

We did not hear anything further though from the RFU - and we were both surprised and angered to discover just two weeks ago, from a third party, that the RFU had in the interim made a new planning application to LB Richmond that proposes to re-build a second fence and make it higher than previously - at the same time replacing and strengthening its existing fence line along the entire DNR reach. The links to this new application, and the previous planning history, are provided below along with a photo of the site. Note that FORCE were not informed about this application by the RFU or the

council despite our long involvement with both the RFU and the DNR, and our previous direct involvement with this development.

In our view this application seeks to revoke the key public benefits provided as part of its previous planning premission and to add new impositions on the DNR corridor. The justifications given are in our view spurious, and would all in any case have been known about in advance of the initial application. The approach appears to be of a piece with the RFU's overall approach to the DNR improvement project being both unscrupulous and contrary to the public good.

The most frustrating aspect of all this is that there is a great opportunity here for the RFU to engage constructively with both Richmond and Hounslow councils and other partners to deliver major benefits along the DNR, linking Twickenham to Isleworth along an improved green route. This, with over £400,000 funding already in place, would create a major World Cup legacy on the RFU's doorstep.

FORCE has exhausted its capacity to influence the RFU alone - and intends to object to this latest application in the strongest terms both through the planning process and in the local media. We are writing to you in a final attempt to engage directly with the RFU through your offices and see if there remains an opportunity to deal with these matters in a reasonable and mutually beneficial manner. Note that the planning web-site states a decion is due on this latest application on 17th June,

Yours sincerely  
For and on behalf of FORCE Trustees

Rob Gray  
Chair

Copied to Ian Ritchie RFU CEO



This photo, taken last month, shows: (1) the posts from the old outer fencing and the heras fencing (2) the inner fencing with the large and obtrusive facilities immediately behind and (3) the very narrow existing footpath

The RFU application for proposed security fencing which has been submitted for determination:

[http://www2.richmond.gov.uk/plandata2/Planning\\_CASENO.aspx?strCASENO=15/1691/FUL&DocTypeID=41#docs](http://www2.richmond.gov.uk/plandata2/Planning_CASENO.aspx?strCASENO=15/1691/FUL&DocTypeID=41#docs)

The previous planning history for the relocation of the fence, this is as follows:

**Ref: 13/2130/FUL**

[http://www2.richmond.gov.uk/plandata2/Planning\\_CASENO.aspx?strCASENO=13/2130/FUL&DocTypeID=28#docs](http://www2.richmond.gov.uk/plandata2/Planning_CASENO.aspx?strCASENO=13/2130/FUL&DocTypeID=28#docs)

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