

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

15 August 2014

Dear Cathy,

**RICHMOND EDUCATION AND ENTERPRISE CAMPUS DEVELOPMENT
ENVIRONMENTAL IMPACT ASSESSMENT SCOPING REPORT, FINAL, July 2014:
RESPONSE TO CONSULTATION BY FRIENDS OF THE RIVER CRANE ENVIRONMENT**

This letter constitutes the response of the Friends of the River Crane Environment ("FORCE") to the formal consultation undertaken by the London Borough of Richmond upon Thames ("LBRuT") with respect to the contents of the "Richmond Education and Enterprise Campus Development Environmental Impact Assessment Scoping Report, Final, July 2014." This response contains:

- Background to FORCE
- The policy context for the Environmental Impact Assessment Scoping Report
- Principal omissions from the Scoping Report.

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, and hopes to continue this relationship into the future.

The policy context for the Environmental Impact Assessment Scoping Report

LBRuT is under an obligation to provide environmental improvements from the redevelopment of the Richmond College site – that is, net environmental enhancements, not merely mitigations and compensations for environmental damage. This obligation to provide environmental improvements arises from the requirements of the Council's own planning policy:

“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.” [London Borough of Richmond upon Thames Core Strategy, April 2009].

Additionally the Crane Valley Planning Guidelines, April 2005, specify the following as *“the main impacts to be considered”* in assessing the environmental impact of redevelopment proposals:

- *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.*

Principal omissions from the Scoping Report.

In the context of these Council planning documents, the Environmental Impact Assessment Scoping Report of July 2014 has the following serious omissions:

- Omission of a master-plan approach which sets the environmental impacts of the Richmond Education and Enterprise Campus (“REEC”) development within the wider context of the lower Crane valley
- Omission of consideration of impacts on and enhancements to the West London Green Chain
- Omission of consideration of the impacts of the REEC development on open-space provision and the deprivation index in the lower Crane valley
- Omission of consideration of impacts on and enhancements to the Duke of Northumberland’s River.

1 Omission of a master-plan approach which sets the environmental impacts of the REEC development within the wider context of the lower Crane valley

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 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. Yet the EIA as currently specified does not even include consideration of the contiguous Depot site, let alone of the wider systemic impacts of the above-mentioned developments for the lower Crane valley.

FORCE believes that the Council should 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 Supplementary Planning Guidance 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.”*

Such a master plan would provide an appropriate and meaningful context into which the REEC development Environmental Impact Assessment (“EIA”) would fit. 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.

2 Omission of consideration of impacts on and enhancements to the West London Green Chain

This is an explicit requirement of the 2005 Crane Valley Planning Guidelines, but it is not explicitly referenced in the Scoping Report. The College site is a part of the West London Green Chain, and it is anticipated that any EIA for the site would need to consider this wider environmental context for the development. It would be difficult for the REEC development partners credibly to meet this requirement without the master-plan approach referenced above.

In particular, it would be helpful for the master plan to include an assessment of how the open spaces within the planning guidelines contribute, individually and cumulatively, to the overall environmental value of the Green Chain. Such an assessment would provide the baseline against which the crucial test of CP12.A – whether or not a development contributes to a net improvement in the environment and access in the corridor – can be evaluated.

3 Omission of consideration of the impacts of the REEC development on open-space provision and the deprivation index in the lower Crane valley

The 2011 Twickenham Area Action Plan commits the Council to an objective to *“Enhance the open spaces of the Crane Corridor and manage them for environmental benefit as well as community use”* (p.28). The REEC development has the potential significantly to increase pressures on open spaces, not just in the immediate vicinity of the REEC but throughout the lower Crane valley. In particular, any plans further

to increase residential provision following cancellation of the Haymarket Headquarters development, and potentially to restrict public access to and usage of Craneford East Field, would considerably increase pressures on open space.

The EIA should make transparent the impact of the specific changes that are planned in the REEC development on the other, already well-used adjacent open spaces within the lower Crane valley. FORCE has quantitative data accumulated over several years which shows the pressure of existing usage levels and the extent to which people already use more than one green space in the corridor. We would welcome the opportunity to share this information.

Several residential areas in the lower Crane valley already rate adversely on the index of deprivation of open space. The Scoping Report should commit to make transparent the impacts of the REEC development on the open-space deprivation index, including clear steps to improve deprivation ratings.

Consideration of the impacts of the REEC development on open-space provision must include the establishment of fully resourced plans for the ongoing maintenance of the open spaces in the lower Crane valley. Again, these plans will only have credibility if they are linked with the master-plan approach to all of the open spaces of the lower Crane Valley, adduced above.

4 Omission of consideration of impacts on and enhancements to the Duke of Northumberland's River

The Scoping Report makes only passing reference to the DNR, and the boundaries of the EIA as presented in the Scoping Report omit the DNR altogether. Yet the DNR runs along the western edge of the REEC site contiguous to the "Harlequins Interface" which is shown as included in the REEC development. 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 DNR has the potential to be as impacted as the River Crane, which runs along the southern edge of the REEC site, in terms of construction impacts, surface water runoff, flooding and drainage and the impacts of increased pressures on open space. Accordingly, the DNR should be treated equivalently to the River Crane in the EIA process. Environmental enhancements proposed for the DNR in consequence of the REEC development would of course be incremental to those achievable with the £287k of S106 funds from a previous Harlequins development – currently sitting with LBRuT and due to time out in June 2015 – and the land transfer with associated funding at the RFU site around 750m downstream.

There is no specific reference in the Scoping Report to overshadowing of spaces of environmental value. FORCE proposes that this evaluation is included in the EIA scoper of works and that building heights and massing of the REEC proposals would avoid any overshadowing of the DNR, the Crane or any other open space.

Conclusion

FORCE will review the final EIA to see if and how these omissions are addressed. FORCE would also expect the final EIA to include presentation of a feasible set of environmental enhancements for the Crane Valley, with an evaluation and recommendation for a phased programme of enhancements to be brought forward for public consultation.

FORCE has previously produced for the REEC Local Community Forum a list of potential environmental improvements for this area, and this is provided as an appendix to this document. In particular, FORCE is looking for the final EIA to mark the adoption of a master-plan approach to the open spaces, to include serious proposals for the naturalisation of the Crane river banks adjacent to Craneford Fields and firm commitment to improve the environmental value of and public access to the DNR. FORCE would welcome the opportunity to be involved in the development, detailed design and implementation of any and all of these environmental enhancements.

Yours sincerely,

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

Appendix:

REEC: FORCE objectives for environmental improvements July 2014 (V1.0)

APPENDIX:

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 recreate 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

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. 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.*