

Wendy Wong Chang,  
Planning Officer,  
London Borough of Richmond upon Thames,  
Civic Centre,  
44 York Street,  
Twickenham TW1 3BZ.

15 February 2019

Dear Ms Wong Chang,

**PLANNING APPLICATION NUMBER: 18/4157/RES**

**RICHMOND UPON THAMES COLLEGE, EGERTON ROAD, TWICKENHAM  
TW2 7SJ**

**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 Detailed Reserved Matters application including Appearance, Landscaping, Layout and Scale for the Residential Development Zone of the College development. This response contains:

1. Background to FORCE
2. Comments on specific aspects of this application
3. Conclusion.

## **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 organisation which has been operating in the Crane Valley for the past eleven years, and we have a membership of over 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 ("RuTC"), and hopes to continue this relationship into the future. FORCE has participated actively in the Richmond Education and Enterprise Campus ("REEC") Local Community Forum and its successor Community Liaison Group since the outset of the proposed development. We have also been working closely with LBRuT for several years on a number of projects that are immediately adjacent to the College development. We are submitting this formal response with the intention of ensuring that the

design and implementation of the college scheme has the best possible interface with these projects.

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

FORCE has comments on the following specific aspects:

- The design of the housing proposals
- The impacts of the housing proposals on Craneford West Field and Kneller Gardens
- The opportunity to integrate Craneford West Field and the Challenge Court “Meadow”
- The impacts of the housing proposals on the Twickenham Junction Rough pathway
- Proposed Marsh Farm Lane improvements
- The Craneford Way pavement along the College Playing Field and Marsh Farm Lane crossing of Craneford Way
- The Duke’s River path and its interface with the new junction proposed between Langhorn Drive and the A316.

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

FORCE is concerned that the proposed massing of the residential units to a height of five storeys will overshadow the Marsh Farm Lane path north of Craneford Way in the west, and will cause visual intrusion to public users of Craneford West Field. The overshadowing may also prevent the growth and success of the proposed “ecology corridor” and public Garden spaces in the housing development.

FORCE is also concerned at the apparent absence of litter bins and arrangements for litter management on the site. The site is planned to accommodate 580 residents, and will be adjacent to a site with 3,000 FTE daytime students and 750 secondary school students. The potential for litter generation is significant, and FORCE is particularly concerned that unmanaged litter from this dense population will spill over onto Craneford West Field and into either the River Crane or the Duke of Northumberland’s River (“DNR”), and thence into the Thames and marine environments.

FORCE welcomes the provision of the “ecology corridor” 4-6 metres wide, including large native tree species, between the school and the residential units, and would welcome a more general extension of the ecology corridor around the REEC site where space permits.

FORCE supports the proposal that the West, Central and East Garden spaces within the residential development should be open to the general public, and supports their being open on a 24/7, 365 days per year basis. FORCE would like the public’s right of unfettered access to all of these Garden spaces to be written into any planning consent for this housing development.

FORCE supports the proposal that lighting columns be “as short as possible to reduce the ecological impact such as effects on bats.” The Crane and the DNR are both important dark corridors for foraging bats. Just because the Ecological Survey and Bat Assessment deemed the presence of roosting bats to be “low to negligible” does not mean that measures should not be taken to improve potential bat habitats. FORCE also supports the proposal that

“lighting to the central courtyard shall dim if no presence is detected after a fixed time during hours of darkness.” FORCE would like this approach to be adopted throughout the entire REEC site as far as possible, in order to minimise light pollution.

## **2.2 The impacts of the housing proposals on Craneford West Field and Kneller Gardens**

As noted above, the REEC residential housing is planned to accommodate up to 580 residents, likely oriented towards families. The REEC development itself is projected to accommodate 3,000 FTE daytime students and 750 secondary school students. Craneford West Field and Kneller Gardens will be the nearest open green spaces available to this population, other than the formal on-site Gardens in the residential development.

Craneford West Field is already used intensively by local residents. In 2013 RuTC 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. Since that time, 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 200-300 more housing units are proposed following re-designation of the former Gregg’s site for residential housing. 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 its games activities. Moreover, Harlequins FC continues to use Craneford West Field for a number of training and mini-rugby events.

In this context, FORCE notes with concern the Play Strategy Plan for the REEC residential housing. This proposes 639 m<sup>2</sup> of playspace for children aged 0-5 in the three on-site Gardens, but “5-15 play provision off site.” No further detail is provided. 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 the REEC 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.

At the time of the Outline Planning Application, FORCE rejected the REEC developer's statement that its development would result in only "a 7.2% increase in the population likely to use the [West Field] facility." FORCE also rejected the REEC partners' contention that the open spaces provided around the residential units would absorb the pressure imposed by the additional residents. FORCE also rejected the assertion that "both College and Secondary School pupils' needs will be met within the REEC development." It remains the case that College students in particular will be free to leave the College site and its private spaces at any time, and will likely gravitate towards the West Field, particularly if the East Field is already in use for organised games, as will Secondary School students too, particularly after school hours. Junior football and rugby teams, and potentially others displaced by the development of both the North and East Fields, will also seek to use the West Field. We know this because this is already happening and has happened over many years with respect to the college students.

FORCE believes that the REEC development partners must set out clear proposals on which local open space areas are to be used by (a) college students (b) secondary school students and (c) students of the special needs facilities; how these uses are to work and what the implications will be for general public use. Previous experience indicates that there are considerable difficulties caused by dual use of open spaces by school sports activities and the general public and it is important to identify potential conflicts and debate how these are to be resolved.

FORCE also believes that the REEC development partners should be obliged to develop relationships with other schools in the area, including Richard Reynolds, to provide access to Craneford East Field for sports activities. This would require the REEC to share its exclusive access to the East Field with other schools, rather than diverting all other demand for sports onto the public's West Field. This would help to relieve the impending pressures on the West Field and Kneller Gardens.

FORCE understands that Richard Reynolds are cutting back their usage of Craneford West Field from five to one day per week. This is an improvement, but nevertheless it constitutes non-availability of the open space to the public, and additional wear and tear on a public space that would not have been necessary if the school had included sufficient provision for its current and future sporting needs.

FORCE regards Harlequins' continued usage of the West Field even more seriously. We understand that Harlequins will be using the West Field for periods of between 2 and 4 1/2 hours on 5 occasions within a 35-day period (i.e. an average of once per week) during January and February 2019. During these months, the playing surface is particularly vulnerable to damage. By dint of what they do (i.e. rugby union) Harlequins will inflict heavy wear on the vulnerable surface. Thus, Harlequins will not only deny local residents access to the free-of-charge space while they are using it, but they will damage the surface for several days after each usage, thus making the free-of-charge space very unattractive to residents who wish to use it.

Harlequins are a development partner of the REEC. As a development partner, Harlequins has rights of access to Craneford East Field that the public does not have. In FORCE's view, Harlequins should be required to exercise these rights, instead of continuing to deny the

public's rights to Craneford West Field, and degrading the amenity value of the West Field. In FORCE's view it is a matter for the development partners to resolve their internal pricing issues in a manner which does not impose further externalities on Craneford West Field and the wider community.

For the record, FORCE supports the continued availability of public access to as much of the Craneford East Field as can be secured on an unfettered basis free of charge to residents. The distributional impacts of this aspect of the REEC proposal must be recognised. The general public, including those from economically and socially deprived backgrounds who might be expected to benefit most from access to the physical and mental health benefits of open spaces, risk being excluded from these open spaces by these proposals. They will be forcibly displaced by the economically and socially privileged who can afford the fee-rates charged by REEC for the use of Craneford East Field.

For the record also, FORCE continues to oppose any prospective lighting of the Craneford East Field. This remains a possible downstream outcome of the proposed development of this space, based on the experience at the former Whitton School. Floodlighting would be significantly detrimental to the quality of life of local residents, and would be significantly deleterious to the local environment (particularly local bat populations). Lighting would irreversibly damage the "dark corridor" that now stretches from Twickenham Junction Rough to Hospital Bridge Road, and fundamentally militate against any ecological rehabilitation of the corridor.

### **2.3 The opportunity to integrate Craneford West Field and the Challenge Court "Meadow"**

FORCE believes that 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 imperative that the proposed REEC housing development should also be the trigger for implementing this improved integration of the spaces.

### **2.4 The impacts of the housing proposals on the Twickenham Junction Rough pathway**

The new public pathway through Twickenham Junction Rough ("TJR") 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 has evidence from our twice-yearly usage counts that the TJR pathway is already providing an attractive route into the town centre for existing residents.

FORCE is concerned that the increase in usage of the TJR pathway from new REEC residents, 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 Gregg's developments, will fundamentally change the character of the new TJR open space, and compromise its value as a Site of Local

Importance for Nature Conservation (“SLINC”). FORCE is concerned that the increased usage will cause increased littering into the River Crane at the Marsh Farm Lane footbridge over the river. Such an increase in littering will inevitably lead to an increase in Thames’ and marine pollution. The increased usage will also lead to increased littering in the TJR open space.

FORCE is concerned that the increased usage will stoke demands for the activation of lighting along the TJR pathway, for which passive provision has already been made. FORCE is also concerned that it will lead to increased demands for the removal of trees and associated understorey along the pathway.

FORCE remains opposed to the designation of the TJR pathway as the principal route to the College site. This proposal may be superficially attractive to many local residents, as they envisage it would take College students away from the residential streets around the college. However:

- the College has no jurisdiction over how College students move once they have left College grounds
- the pathway through the TJR is currently closed after dark, at which time all students will anyway need to use the residential streets
- it must in any case be unacceptable to try and insist that College students travel through a more quiet and secluded space that some would be uncomfortable or feel unsafe when using.
- potentially the environmental value of the green corridor will be eroded over time as more pressure is exerted on the pathway from users.

Accordingly, this proposal is not deliverable by the College, and the College is therefore creating a false expectation for local residents.

FORCE believes that the development partners’ housing proposals should only be approved with significant assurances of appropriate remedial measures against the impacts of this increased usage. Such measures should include a long-term commitment to fund the management, maintenance and litter clearance of the TJR pathway, the TJR and Craneford West Field open spaces, and the Marsh Farm Lane pathway.

## **2.5 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.

## **2.6 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 REEC housing proposal provides an opportunity to review and reduce these risks. There is a further concern regarding the interface between college students and the children's playground that would benefit from being addressed. The council are also looking at how these issues 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 REEC should 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.

## **2.7 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 pedestrian access route to the REEC for students north of the A316, and this pedestrian access will benefit the REEC by reducing the demand for vehicular access to the REEC site. REEC students, existing residents and the residents of the proposed REEC housing will all benefit from improvement to the Duke's River path crossing.

Again, however, FORCE is concerned that the increased usage from REEC students and REEC housing residents will lead to increased littering of the Duke of Northumberland's River, with consequent Thames and marine pollution, and negating the improvements already achieved in the DNR. FORCE therefore believes that as a minimum, the REEC should commit to long-term funding of litter clearance and maintenance at this pathway crossing. The REEC should also be obliged to fund signage and interpretation to emphasise the link between the existing Duke's River pathway and the new crossing.

## **3 Conclusion**

We believe there needs to be three-way liaison and discussions between FORCE, LBRuT and the College (potentially also including Harlequins) and/or its developers to maximise the benefits of these housing proposals for the environment and the local community, and to mitigate the pressures of over-usage, littering and degradation of the remaining open spaces in this highly developed part of the borough. FORCE would warmly welcome the opportunity for discussion of all matters raised with the college, its planners and the relevant council staff.

Yours sincerely,

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