

WoBP Consultation
Spatial Planning and Infrastructure Team
London Borough of Hounslow
Civic Centre
Lampton Road
Hounslow
TW3 4DN.

10 December 2017

Dear Sir,

**Draft Consultation West of Borough Local Plan review (West of Borough Plan (“WoBP”))
Preferred Options Consultation, October 2017**

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

Our response is structured as follows:

- Background to FORCE
- The “Green Opportunity” of the WoBP
- Comments on the WoBP.

1 Background to FORCE

FORCE is an environmental and community based charity, founded in 2003 and with some 500 members, most of whom are residents of the London Boroughs of Richmond upon Thames (“LBRuT”) and Hounslow (“LBH”). Our Objects are “to promote for the benefit of the public, and to advance the education of the public, in the conservation, protection and improvement of the physical and natural environment” of the River Crane and the Duke of Northumberland’s River (“DNR”). More information on our organisation can be found at www.force.org.uk

FORCE has an overarching ambition to support the creation of a west of London linear Regional Park along the Crane valley of up to 400 hectares, linking its source in the London Borough of Harrow with the Thames in LBH. This ambition is consistent with the identification of the Crane valley as a linear park in Thomas Adams’ 1924 West Middlesex Plan, subsequently adopted by Middlesex County Council, which safeguarded the open land along the river and required a minimum setback of 50 yards where development was allowed.

Alongside the five riparian boroughs and Heathrow Airport Limited, we are members of the Crane Valley Partnership, cooperating to improve and promote the Crane as a valued environmental and ecological asset for the west of London. In its press release of 18 January 2016, Heathrow Airport Limited committed to work with FORCE “to

improve the quality of the habitat for watercourses to the east of the airport and increase their community value.” FORCE has a track record of working in partnership with councils and developers to enhance the value and usage of open spaces, and to improve the connectivity between open spaces for pedestrians and cyclists.

We take a deep interest in developments in the River Crane catchment, especially in LBH, given the Borough’s strategic location within the Crane valley and the implications of any developments in LBH for the Crane and DNR downstream. To this extent, we have provided input into a wide range of consultations concerning Heathrow Airport, Rectory Farm, the Hounslow West of Borough Plan Review in 2016 and the Feltham Masterplan in 2017; and we have appreciated the constructive response of LBH to our input, most recently in the Feltham Masterplan.

Much of the area addressed by the WoBP falls within the River Crane catchment. The Crane corridor forms the eastern edge of the Plan area and the upper Duke of Northumberland’s River and Longford River, two ancient artificial channels and key parts of the Crane catchment, both run across the central part of the Plan area. It is in this context that FORCE submits these comments on the WoBP.

2 The “Green Opportunity” of the WoBP

FORCE acknowledges the housing and economic development pressures that are a key stimulus for the WoBP. These pressures are often seen as being in direct conflict with the environment and ecology: a zero-sum game. However, FORCE takes the view that development pressures can also create opportunities to achieve environmental and ecological improvements that otherwise might not take place or might take longer to come about, and we have a track record of helping to deliver these in developments in LBRuT and LBH.

It is from this perspective that FORCE approaches the WoBP. FORCE is concerned that the WoBP will miss the opportunity to make a significant contribution towards the realisation of the 100-year-old vision for a west of London Regional Park. LBH has already invested in important improvements towards this, in pathways in Crane Park and the lower DNR and in the open spaces of Pevensy and de Brome Fields. Heathrow Airport’s own expansion plans and the Feltham Masterplan both support the promotion of green spaces consistent with this vision, and FORCE believes that the WoBP can make a significant contribution also.

The housing and employment developments are clearly focused on improving the livelihoods of WoB residents. But FORCE believes that alongside these developments, investment in the quality of open spaces and a strategic approach to linking new and existing open spaces with the Crane valley, the DNR and Longford Rivers, can together improve the health and wellbeing of WoB residents, redress the inequities in quality of life and life expectancy between the WoB and the rest of LBH, and support healthy, low-cost access to housing and employment opportunities.

In its expansion plans, Heathrow Airport Limited identified the potential to create new and enhanced public green spaces around the airport that would be four times the size of Hyde Park. FORCE believes that the open spaces to the south and east of the airport should be improved whether or not Heathrow expands, and that development provides a key to unlock these improvements.

The WoBP emphasises de-designation of Green Belt to enable development, with passive surveillance of residual open space and fragmented new open spaces. It regards the poor quality of the existing open spaces as a justification for building on them. The WoBP does not at present make the most of the opportunity to improve and better link these open spaces together as a lasting enhanced green infrastructure asset for the borough. FORCE is concerned that the WoBP, as it stands, will reduce the open spaces available to already deprived residents, and will impose further blockages to the connectivity between open spaces, further reducing the value of the corridor as a whole.

FORCE takes a different view of the open spaces and of their scope for connectivity. We believe that the existing open spaces provide an opportunity for lasting improvement, and that the currently fragmented open spaces can be connected relatively simply and cheaply to create strategic corridors for people and wildlife. These will benefit the health of residents, their green transport and employment opportunities, the quality of their available amenities and the quality of the environment and ecology. This is crucial in the WoB area, where the health prospects of residents, their access to quality green space and the quality of the environment are all seriously degraded, even by comparison with the rest of the borough, let alone by national standards.

FORCE favours an approach which regards the open spaces as green infrastructure, which should be targeted for investment and management plans to improve its quality; and investment in connectivity between green spaces to provide strategic personal-mobility and ecological corridors. This latter requires investment in the removal of barriers that create severance between open spaces, investment that must be integral to and enabled by the investment in housing and employment development.

In this context, FORCE remains particularly concerned by the emphasis in the WoBP on urban growth and utilising green belt and related open spaces to achieve this – without any evaluation of the value of these spaces as a community asset and how this value can be improved for the benefit of local communities. This emphasis has continued into the WoBP despite our response to the 2016 West of Borough Plan Review consultation. Far from providing or protecting green infrastructure, the WoBP adds to the threat to green infrastructure already posed by Heathrow development and associated expansion. FORCE considers that this approach is contrary to the best interests of the open spaces and the local communities they serve, contrary to LBH's own commitments through the Crane Valley Partnership and the GLA's All London Green Grid, and also contrary to local, regional and national planning policy.

The WoBP systematically emphasises growth and systematically neglects counterbalancing environmental improvement. The Introduction to Spatial Policies (p41) states “a key intention for the WoBP is to stimulate growth and expansion...It aims to get the balance right between positively meeting the development needs of the area...and ensuring that it is supported by appropriate level [*sic*] of social, green and physical infrastructure.” But the WoBP consistently provides far more detail and specificity about the development side than about the green infrastructure. It is systematically vague about the environmental impacts of development and about any proposals for environmental improvement.

The WoBP sets out not only to meet the borough’s housing needs but to contribute to meeting London’s housing needs (p45). It also sets out to “creat[e] the conditions for economic growth” (p49). But the WoBP sets out no comparable proposals for enhancing the quantum or quality of open spaces for the existing deprived WoBP residents. The focus of WOB4 is on Green Belt de-designation, and the proposed “new public space” is minuscule by comparison with the area of Green Belt, over 100 hectares, that is proposed for de-designation. Although the “Vision” asserts that sustainable growth will be supported by “high-quality open space,” (p35) the WoBP is completely devoid of detail as to which open spaces will have their “physical quality” enhanced, and as to what form such enhancements will take. As one example, there is no mention of any attempt to leverage the £105 million which Heathrow Airport Limited stated in 2016 would be available for “green space creation.”

Typical of this imbalance is that the “Duty to cooperate” (p17) trumpets the Council’s membership of the Heathrow Strategic Planning Group and the West London Alliance, but does not acknowledge its membership of the Crane Valley Partnership for addressing “strategic and cross-boundary” environmental issues.

Of the four priorities presented on p24, the WoBP will not only fail to deliver three: “for our children and young people...improvements in health,” “A cleaner, greener borough” and “Active, healthy communities.” It will actually make all three worse:

- It will reduce the total amount of green space available in the borough
- The reduced area of green space will be subject to much increased utilisation and degradation from the increased numbers of residents and employees
- Proposed new public spaces, improvements to existing spaces and new pedestrian/cycle routes are too paltry to offset these pressures.

To this extent, the WoBP fails to give due weight to the extensive research into the economic benefits of green infrastructure that is now available, for example at [http://www.greeninfrastructurenw.co.uk/resources/The Economic Value of Green Infrastructure.pdf](http://www.greeninfrastructurenw.co.uk/resources/The_Economic_Value_of_Green_Infrastructure.pdf)

3 Comments on the WoBP

These follow the order of the WoBP.

WOB1 Housing

The Mayor's London Plan urges that housing targets be 'augmented' "where further opportunities can be created for sustainable growth." (p45) FORCE maintains that growth which can only be achieved by the permanent renunciation of Green Belt is by definition not "sustainable."

While FORCE is not opposed in principle to the Heathrow Opportunity Area being used to provide housing that exceeds borough needs as a contribution towards the London Plan, FORCE is strongly opposed to using de-designated Green Belt land to enable this.

WOB2 Employment Growth

Strategic objective 2 (p36) refers only to "benefit[ing] from the commercial opportunities from Heathrow airport...including a wide range of employment spaces and retail uses." It is silent on the opportunities to benefit from the airport by investing in green spaces, eliminating severance and improving walkways and cycleways. FORCE has already set out detailed proposals for improvement opportunities linked to any development at Heathrow (in response to the DfT consultations early in 2017) and these are formally shared with the council as Appendix A to this response.

WOB2 anticipates a positive impact of additional residents on the retail offer in Feltham (p48), but fails to acknowledge the likely negative impact of the same residents on the reduced open spaces. The WoBP fails to acknowledge the positive impacts that high-quality open spaces, pedestrian and cycle ways can have in attracting residents, visitors, employees and economic activity. The Council appears to set no expectation that development proposals will contribute to maintaining and improving the environment (p49). FORCE has already set out detailed proposals for improvement opportunities linked to Feltham re-development in our response to the Feltham Area proposals earlier in 2017 and these are included again as Appendix B to this response.

FORCE rejects the Council's definition of "a few green belt sites that mainly do not meet the purposes of the green belt" (p50): Figures 4.8 and 4.9 show that a considerable number of sites are proposed for de-designation. These sites are significant in size and they are also significant in function, both environmentally and in their role of demarcating individual communities within the borough. FORCE rejects the policy of using de-designated Green Belt "to help 'close the gap' between demand and supply of industrial land," instead favouring more rigorous prioritisation of brownfield exploitation.

WOB3 Design and Heritage

FORCE does not accept that "The West of Borough area is characterised by...low value open land." (p54) The increased population and business activity anticipated in

the WoBP will increase the scarcity value of such open land as remains after development. FORCE would have welcomed far more detail than the WoBP provides to support its statement, “Sites which have been identified for potential development...offer opportunities to create new public spaces.” (p59)

FORCE supports the WoBP’s proposals for “improvements to the open spaces and the public realm.” (p55) However, FORCE believes that investment in such improvements should not be confined to “historic and heritage buildings,” but should be undertaken for all of the previously identified “low value open land,” for which it would certainly achieve an increase in amenity value. The proposals for Rectory Farm elsewhere in the Borough provide a model: here, hitherto “low value open land” will, if LBH’s planning conditions are fulfilled, deliver a brand new, high quality urban park. Such investment should meet “the highest standards of design and placemaking” for the open spaces, every bit as much as for proposed developments.

FORCE supports the provision of “well-designed and generous pavements” (p55) for walkers, and would also seek such considered provision for cyclists making use of inter-connecting networks between open spaces, including off-road provision where possible.

WOB4 Green Belt, Metropolitan Open Land and Open Space

FORCE notes that the Chancellor’s budget statement of 22 November 2017 stated that the Government is committed to “Making best use of our urban land, and continuing the strong protection of our greenbelt.” We also note that the GLA Environment Strategy and the emerging London Plan specifically seek to maintain and protect Green Belt within the GLA region. The strategy states in Proposal 5.1.1a “Through the new London Plan the Mayor will protect the Green Belt, Metropolitan Open Land and publically accessible green space”.

FORCE welcomes the WoBP’s recognition that “increases in population in dwellings with limited private amenity space increase the need for public spaces.” (p63) We are therefore concerned that the WoBP fails to reflect this recognition in its proposals to de-designate large areas of Green Belt, and in its failure to provide significant new open spaces and to provide detail as to how existing open spaces will be improved.

FORCE does not recognise that “Some land currently protected as green belt no longer serves green belt purposes.” (p62) Most of the large tracts of green belt proposed for de-designation serve the fundamental function of demarcating settlements and preventing urban sprawl. The WoBP recognises that “The area is made up of a number of separate town centres and villages including Feltham, Heston, Cranford, Hounslow West, Bedfont and Hanworth.” (p23) Yet the Green Belt Review classifies all of LBH as an indivisible part of the London urban area and the Green Belt is intended only for the boundary with Surrey.

The WoBP recognises that “All of the Borough’s existing Metropolitan Green Belt is located in the West of Borough area.” (p23) Thus, any development on this Green Belt not only deprives the West of Borough, but exacerbates the deprivation and inequities that already prevail in the rest of the Borough.

FORCE is strongly opposed to “reclassifying a large portion of the Green Belt as Metropolitan Open Land,” (p28) as this simply removes environmental protections with no compensating environmental benefit. The statement that “Contributions towards the enhancement of remaining Green Belt (GB) land and newly designated Metropolitan Open Land will be sought for development proposals on de-designated GB land” (p64) provides no reassurance: our concerns include that contributions will be negotiated away in pursuit of viability, and will not compensate for the permanent loss of green belt protection.

The WoBP fails to explain how LBH will assess whether any development in de-designated Green Belt land has actually achieved enhancement of local open space, and what sanctions the borough will impose where the local open space is deemed to be inferior to that of the former Green Belt. The proposal to “Provide compensation for losses of Greenbelt...to improve quality and public access to adjoining Green Belt, MOL and/or Open space” (p65) is completely unsubstantiated and therefore provides no reassurance. FORCE would like to know how compensation will be calculated and enforced, how quality will be improved, and how free public access will be maintained for residents of open-space-deprived areas who will have to travel even further to reach residual open spaces.

FORCE would only support “that boundaries are altered to accommodate additional employment and housing on a select number of sites within the Green Belt” (p28) if compensating areas are added to the Green Belt such that the net quantum of Green Belt land is unchanged. FORCE would like the WoBP to exhaust “the regeneration of previously developed land” (p44) i.e. the brownfield sites in the borough, before any de-designation of the green belt is considered.

The “new open spaces...provided within new developments” (p64) appear from Figure 4.9 to be minuscule, and insofar as they are provided within new developments, it is not clear how accessible or how welcoming to the general public these spaces will be. This is of concern, since these are the only new open spaces proposed within the WoBP: their potential lack of access and welcome compares particularly badly with that of the existing open spaces which are proposed for sacrifice, many of which are open to all, and have the potential to be improved into attractive parkland.

FORCE welcomes the WoBP’s commitment to “Protecting and enhancing the existing green infrastructure network, including the grid identified in the Mayor of London’s All London Green Grid SPG.” (p64) However, FORCE would welcome much more detail as to how the WoBP proposes to achieve this.

FORCE notes the WoBP’s proposals for “Promoting the multifunctional and shared use of existing open space for play and sports including schools and private sports facilities” (p64). Much of the WoB’s current open space is available to the general public free of charge at all times of the day and year. FORCE would be concerned at any proposals which restricted public access only to those with the means to pay for it, or which reserved access for use by schools and thereby denied public access.

FORCE welcomes in principle the proposals for “Improvements to existing parks” and “Provision of natural green corridors” (p64) but needs much more detail in order to be satisfied that WoBP proposals will lead to overall environmental improvement for the borough.

FORCE is deeply concerned by the WoBP’s expectation that development “Respond to retained Green Belt, in particular at Feltham Marshalling yards, to ensure passive surveillance of open space uses to help encourage use of these spaces.” (p64) FORCE objects to the use of development overlooking open space as a means of providing surveillance for that space. Our experience is that overlooking by housing does not encourage use, but rather deters it. It does not provide effective surveillance, does not promote a sense of safety or “ownership” among residents, and does not of itself lead to improvement in the quality of the space. We are aware of local open spaces that are overlooked by one or more of housing, shops and/or main roads, but remain in a poor condition and poorly patronised.

We do not believe that overlooking leads to automatic improvement – what overlooking will do though is remove or reduce the quietness and peacefulness of the open space. This sense of being “with nature” and “away from urban noise and bustle” is a key characteristic of some of the larger open spaces in this area. This characteristic is of great actual and potential value to the quality of life of local people, providing enhanced mental and physical well-being. This value is not being maximised at present as the spaces are under-used, but that is a reason to enhance their use and appreciation rather than to build on them. Building on them will wilfully increase the open-space deprivation already experienced by West of Borough residents, with concomitant detrimental physical and mental health effects.

Specifically on the Green Belt of Feltham Marshalling Yards, FORCE is opposed to any construction of housing without conditioned guarantees that the remainder of the site will be opened up to public use and managed as a new public space. Indeed, FORCE would prefer that there be no development on the Marshalling Yards site, but that the opportunity be taken to bring parkland nearer to the centre of Feltham, linking with other green spaces in Feltham (see P1 below) and contributing positively to the health and wellbeing of residents.

FORCE supports the proposals to “Improve the overall greenness of the area” (p65) but emphasises that this must not be tokenism. The greening measures should be systematic and supported with management and maintenance plans and resources.

WOB5 Transport and Connectivity

FORCE supports the WoBP’s recognition that “Public Transport from the West of Borough to Heathrow Airport is limited.” (p70) However, the WoBP places heavy emphasis on new infrastructure – Southern Rail Access – and increased public bus and rail services. FORCE would place much more emphasis on the provision and improvement of pedestrian and cycleways, which are currently wholly inadequate. These could play a major role in improving air quality around Heathrow and encouraging employees to cycle to their places of work around the airport.

In particular, FORCE would like the WoBP to recognise that the upper Duke of Northumberland's River and the upper Longford River, running alongside Heathrow Airport Terminal 5, the Cargo Terminal and Terminal 4, have the potential to form a strategic link for cyclists and pedestrians between the south of the Airport and the lower Crane valley. A high-quality pedestrian and cycle route would directly link the Airport with Feltham and Hanworth, and with Hounslow, Twickenham, Isleworth and the Thames. This route would provide safe, healthy, affordable journey-to-work opportunities for WoB residents at Heathrow, as well as providing attractive, high-quality, healthy leisure facilities for residents. This proposal links to proposals put forward by FORCE and considered by Heathrow Airport Limited for improvements to cycling and walking provision to and around the Heathrow site (see also Appendix A).

In this context, FORCE is deeply concerned that the alignment of the Southern Rail Access shown in Figure 4.10 appears to compromise the strategic potential of this route. West of Terminal 4, the alignment appears to be built over the Duke of Northumberland's and Longford Rivers towards the Cargo Terminal and Terminal 5.

FORCE supports the proposal to develop the Greenways route along the Longford River (p71), but notes that there is no such proposal, nor even recognition, that the lower Crane valley could provide similar connectivity into Heathrow. Neither Figure 4.1 nor Figure 4.10 show any proposals to improve pedestrian or cycleways along the River Crane between Feltham Marshalling Yards and Hatton Cross. Indeed, Figure 4.1 shows a proliferation of disconnected, unjoined-up pedestrian/cycle routes which will potentially remain unaddressed after 15 years of "Strategic Opportunity."

The WoBP lists "water ways" as a "barrier" to pedestrian access routes (p70). Yet the River Crane could provide a significant pedestrian and cycleway both for local residents and Heathrow employees. However, it suffers major severance from the difficult crossings of the A4, the A30 and the A312. FORCE believes that Heathrow Airport expansion, and any other major development in the West of Borough, provides a significant opportunity to secure funding to overcome these barriers and complete high-quality pedestrian and cycleway linkages along the lower Crane valley.

FORCE supports the proposals for "enhanced walkability to green spaces such as De Brome Playing Fields, Hanworth Park, Hounslow Heath and along the Crane River" (p72) and would seek investment in these green spaces to improve their value as attractive destinations for local residents.

WOB6 Health and Well Being

FORCE does not agree that as it currently stands "The promotion of health and well-being is a key thread running through this Plan" (p78). Key opportunities are being missed by the plan as it currently stands. We believe that one of the keys to providing effective health and wellbeing, which is affordable and accessible, is an infrastructure of high quality green spaces, attractive as destinations, and linked to each other by safe, attractive pedestrian and cycleways. These green spaces need to be considered

as an infrastructure network in exactly the same way as the transport network infrastructure.

Our own research over the last 5 years, which we would be pleased to share with LBH, demonstrates that enhanced open spaces linked by improved pedestrian and cycleways attract step-changes in use by the public. The opening of such a route alongside the lower Duke of Northumberland's River on the LBH border stimulated a tenfold increase in public use within a month of opening. Our research also shows that once they have decided to visit an open space, at least three-quarters of walkers and cyclists seek to link more than one open space in their visit.

FORCE regards the approach to green spaces in the WoBP as fragmented, tactical and unlikely to fulfil its potential in terms of improving public health and wellbeing. We would like to see a much greater commitment to retention of green spaces in the deprived West of Borough, to investment in those green spaces, and to well-resourced management and maintenance plans for the spaces.

FORCE strongly supports the recognition that severance is a major deterrent to walking and cycling for residents (p33) and recommends in particular that the WoBP addresses the barriers to connectivity of the existing River Crane walking and cycling route. As noted above, the route suffers major severance from the difficult crossings of the A4, the A30 and the A312. FORCE recognises that these may be potentially significant barriers to overcome, but believes that the development of the Airport Business Park and Heathrow Gateway should fund all of these improvements. This is entirely consistent with the WoBP aim to "maximise opportunities for compensatory environmental...benefits from partners such as Heathrow Airport, in order for residents in West of Borough area, to lead a happier and healthier lifestyle." (p77)

FORCE believes that the WoBP, with its proposals for de-designating the Green Belt, promoting housing and accommodating Heathrow expansion, is incompatible with its own Strategic Objective 12 for Health and Wellbeing. The reduction in the quantum of available open space, and an increase in population and development, will not "enhance...open space" or "encourage...healthier choices." The WoBP's proposals will increase the distance that residents have to travel to access open space, and when accessed, the open space is likely to be degraded by development and overuse.

P1 Feltham

FORCE is opposed to the re-designation of all of the Feltham Marshalling Yards site from its current status as a Metropolitan Site of Importance for Nature Conservation (p89). FORCE believes that proposals for any construction on Feltham Marshalling Yards represent a missed opportunity to bring extensive green space nearer to the heart of Feltham, and to provide strategic linkage between the green spaces proposed in the Feltham Masterplan and the entire green corridor of the lower Crane valley as far as the Thames.

FORCE would prefer to see investment in improving all of the existing Feltham Marshalling Yards site to provide a high-quality and readily accessible green space for Feltham residents. In particular, given the legacy of previous development on this

site, we are opposed to any construction of housing on Feltham Marshalling Yards without conditioned guarantees that the remainder of the site will be opened up to public use and managed as a new public space.

FORCE supports the proposals to “de-culvert, naturalise and create a path alongside the Longford River to create a high-quality open space.” (p89)

P3 Heathrow Gateway

The quantum of new open space proposed in Figure 5.7 (p105) is minuscule, in relation to both the quantum of Green Belt proposed for de-designation and the quantum of housing development proposed. As elsewhere in the WoBP, there are no specifics as to how the existing open spaces will be enhanced, nor how both new and existing open spaces will be managed. Several of the proposed pedestrian/cycle routes appear not to network with anything.

P4 Airport Business Park

FORCE supports the creation of “easily navigable pedestrian and cycle routes through the site to connect to...the Crane River Corridor, the Duke of Northumberland’s River and associated open spaces” (p109). FORCE would like recognition that the River Crane, the Duke of Northumberland’s River and the Longford River themselves all “offer public transport choices for the local workforce” (p106) through investment in improved cycling facilities along their lengths adjacent to the Airport Business Park. An improved River Crane cycleway would link to the Pedestrian/Cycle route (shown in Figure 5.10) to Hatton Cross Public Transport Interchange, which is proposed as the focus for the Airport Business Park (p110). This is less than half a mile from the Crane.

FORCE would also like recognition that the above-noted severance issues for the River Crane at the A312, A30 and A4 should be resolved as part of any de-designation of Green Belt and investment in the Airport Business Park.

FORCE supports the proposals for “Protecting and enhancing the environmental quality and the biodiversity value of adjacent Site of Importance for Nature Conservation etc” (p110).

P5 Cranford and Heston

Any development or regeneration of Cranford will increase the amenity value of Avenue Park as open green space for residents. Improving connectivity of open spaces, in particular by solving the severance of the River Crane corridor by the A4, would play a major part in regenerating Cranford. Connectivity would also be improved by overcoming the severance posed by the A312 to link Cranford and Avenue Park eastwards with the proposed new park at Rectory Farm. To this extent, FORCE is pleased to note that Figure 5.12 shows Pedestrian/Cycle crossings of the A4 and A30, and would welcome detail as to the practical proposals here. Improved pedestrian and cycle links northwards would also benefit Cranford residents, enabling links with the Grand Union Canal towards Paddington and Brentford as well as removing a further restriction in movement along the Crane valley corridor towards Minet Country Park.

Delivery and Monitoring

“Planning Obligation (Section 106)” (p124) should explicitly recognise that the provision and management of green infrastructure and open spaces is also an important role for S106 funding.

FORCE would be happy to discuss any and all aspects of this submission with LBH representatives.

Yours faithfully,

Rob Gray,
Chair,
Friends of the River Crane Environment

APPENDIX A

DRAFT AIRPORT NATIONAL POLICY STATEMENT

RESPONSE BY FORCE

MAY 2017

1. Introduction

This document has been prepared by Friends of the River Crane Environment (FORCE) in response to the Draft Airports National Policy Statement and associated consultation process.

FORCE is a community and environmental charity with a specific interest in Heathrow and the third runway development proposals due to their potential impacts upon the Crane valley. This response has not followed the structure put forward in the consultation response form as this did not allow the full expressions of our interests, concerns and mitigation opportunities with respect to the Third Runway. However, this response does reference the consultation document and the questions raised in the response form where relevant.

2. Friends of the River Crane Environment

Friends of the River Crane Environment (FORCE) is a community and environmental charity, formed in 2003, with Objects to protect and enhance the community and environmental value of the River Crane catchment. FORCE is entirely run by volunteers and has around 500 members. It operates by engaging with all other interested parties to protect and enhance the open spaces of the River Crane catchment for the benefit of local communities and wildlife. More information on the activities of FORCE can be found at www.force.org.uk

One of FORCE's key activities is to engage with landowners and potential developers along the Crane valley, as well as with planning proposals from government authorities and others, to ensure that the interests of the open spaces within the Crane valley are protected and enhanced. FORCE is not against development per se but engages with the planning process to ensure that any development also enhances both the community AND environmental value of the Crane valley. Where this is not the case FORCE will oppose the development proposals as presented and will often put forward amended or alternative options that would meet the basic requirements of enhancing the community and environmental value of the Crane valley. This approach has been taken in this submission.

FORCE's interests are confined to the environmental and community value of the Crane Valley catchment. FORCE has no opinion on the need

for additional airport capacity and how best to address it, as raised in Questions 1 and 2 of the consultation response paper.

3. The Crane valley

The Crane Valley catchment covers 117sq km of west London and includes:

- Most if not all of Heathrow Airport's existing site area
- The River Crane as well as the Upper Duke of Northumberland's River, Longford River and Lower Duke of Northumberland's River – the latter three all being man made channels built in the 16th and 17th centuries
- Parts of five west London boroughs – Harrow, Hillingdon, Ealing, Hounslow and Richmond
- A population of around 500,000 people within five minutes' walk of the river corridors

The River Crane (known as the Yeading Brook in its upper reaches) is around 35km in length and is a linear green corridor containing and linking around 1500 hectares of open spaces. The corridor has long been recognised as a major wildlife and community asset for west London and is known as the West London Green Chain, one of the major wildlife corridors for London. The corridor itself and many of the associated open spaces are designated as National and Local Nature Reserves, Metropolitan and Borough Sites of Importance for Nature Conservation. The London LOOP makes use of the corridor and it is largely available for walking and cycling as a linear green transport corridor.

The upper and Lower Duke's and Longford rivers are important environmental and green transport assets in their own right and help to link the Crane corridor to the corridors of the River Thames, River Colne and River Brent, creating a network of interlinked green spaces across west London. The Crane valley catchment and its relationship with other local river corridors is shown on Figure 1 below

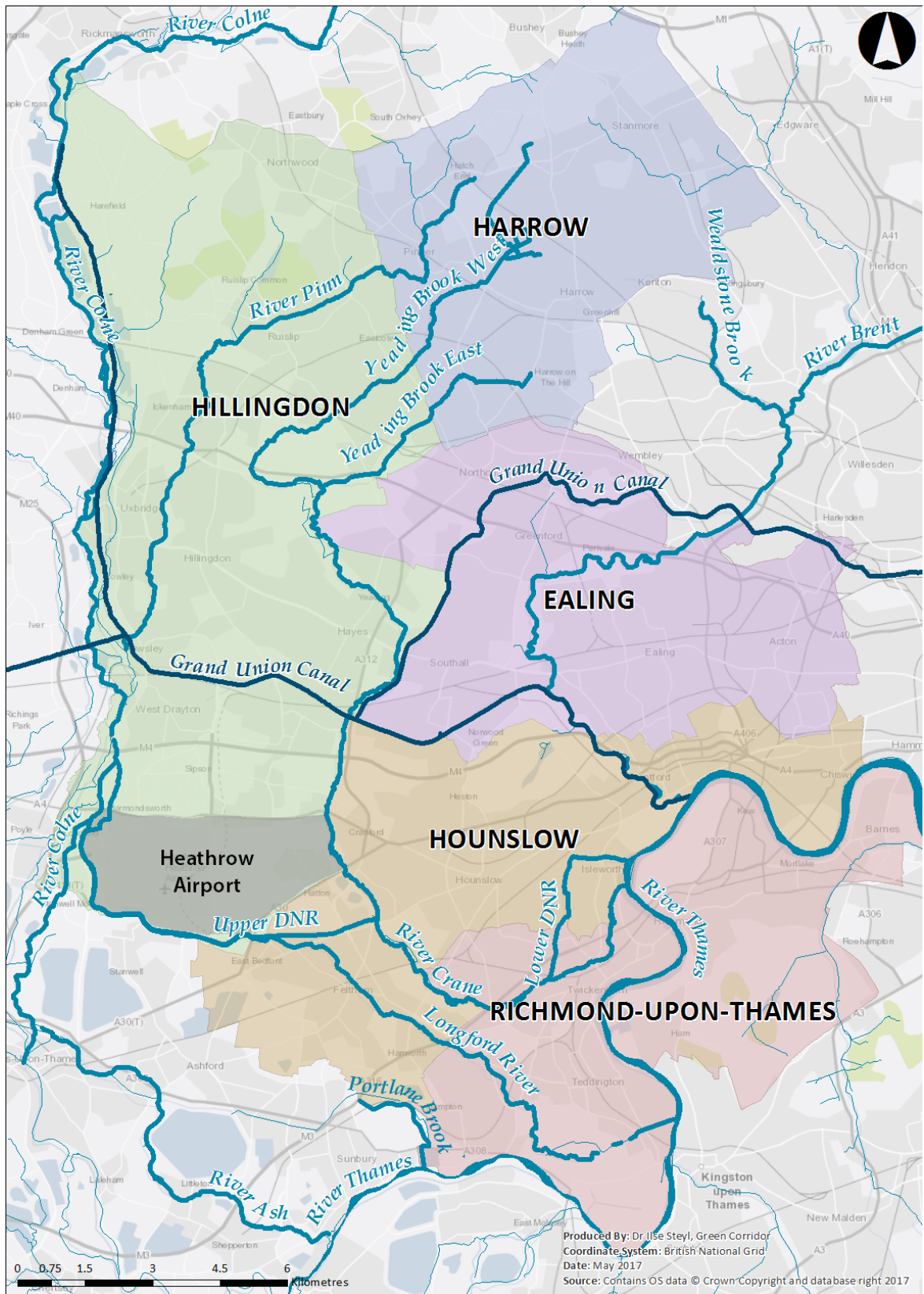


Figure 1: The River Crane catchment, incorporating River Crane, upper and lower Duke’s Rivers and Longford River – and their relationship to the River Colne, River Brent and River Thames

Friends of the River Crane Environment (FORCE)

www.force.org.uk / email: info@force.org.uk

Registered Charity No. 1155971

Registered Company No. 8383410

The Crane Valley Partnership (CVP) represents the interests of the open spaces within the Crane valley catchment. It has around 30 members including all five representative boroughs, the Environment Agency, Heathrow Airport Ltd (HAL), Thames Water, GLA, London Wildlife Trust and FORCE. More information on CVP can be found at www.cranevalley.org.uk

There has been a major growth in interest and investment in the open spaces and corridors of the Crane valley over the last ten years, in large part due to projects and initiatives led by CVP and its partners to improve the environmental and community value of the open spaces and their connectivity. These projects are being delivered by partnerships of local authorities, regulators, private operators (including HAL) and the third sector, many of them engaging large numbers of volunteers.

As a result many more local people use and appreciate these local spaces, and their environmental condition has largely improved. Nevertheless there remain many problems to be resolved and the pressures of development and urbanisation, of which the third runway proposals are a significant part, are relentless.

CVP has embraced the catchment based approach (CaBA) as promoted by DEFRA and the Environment Agency. A Crane Valley catchment plan, produced in 2013 as part of the CaBA, sets out the main objectives for the water environment. Around the same time CVP worked together with the Crane Valley Partnership and the GLA to produce Area 10 of the All London Green Grid. This document set out priorities for developing the green infrastructure networks along the green corridors of the two valleys. These two documents have between them acted as a template for much of the activity over the last few years, with a cumulative investment of several £million in environmental and green transport improvements, either implemented or proposed, and in line with these plans.

The focus for CVP and FORCE has been to develop environmental improvements to these linked green spaces by the engagement of the communities local to them. Projects are designed to improve social cohesion, education, training, employment and health outcomes through the better use of local green spaces by all sectors of the community – with volunteers helping to deliver all aspects of these programmes.

4. The Existing Relationship between the Crane Valley and Heathrow

The existing airport and its associated infrastructure sit entirely or very largely within the Crane catchment. The airport owns and operates a considerable amount of open space within the catchment, including land on either side of the Upper Duke's River and Longford River and a large

area of open space on the west bank of the middle reaches of the River Crane in Hounslow. HAL is a member of CVP and also contributes to its annual operating costs.

One third of the run-off from Heathrow flows into the River Crane at Donkey Wood via the Eastern Balancing Reservoir. There is a beneficial impact for the most part from this run-off, although there are significant negative impacts during cold weather periods caused by excessive glycol de-iceant entering the river and causing high BOD and algal blooms. A category 2 pollution event in January 2017 swathed around 5km of the river in sewage fungus for several weeks with the impact continuing in the Donkey Wood area (immediately downstream of the balancing reservoir) until May 2017. This is believed to have been (though not yet confirmed by the EA) largely a result of outflows of glycol rich water from Heathrow. There is also an ongoing risk of major negative impact related to any pollution incident at the airport.

HAL is developing improved storage and treatment systems at the eastern balancing reservoir to better protect the river (with an investment of £17m). This may also allow improved opportunities to enhance occasional low flow problems in the river in co-ordination with the EA and CVP.

The river corridor provides some of the few places of tranquillity in this urban part of west London. Aircraft overfly the corridor at low altitude and cause considerable noise and air quality impacts to these tranquil areas. A further indirect impact of the overflying is the restrictions imposed on the development of open water habitat due to concerns about bird strike.

Historic development at Heathrow Airport had caused the culverting of the Longford and upper Duke's rivers beneath the site. The Terminal Five scheme brought these two rivers out of culvert and put them around the airport perimeter, albeit netted off to deter birds and in a concrete trapezoidal channel.

5. Impacts of The 3rd Runway Proposals

This section only considers those potential impacts of the third runway that effect the value of the Crane corridor and associated river corridors of interest to FORCE. Other impacts on the communities of the area around Heathrow are outside the remit of FORCE.

There are three aspects to the impacts:

- Direct impacts of the third runway on the catchment
- Indirect impacts of developments associated with the Third Runway
- Impacts upon the neighbouring Colne catchment

Assessments – as per Question 3 of the consultation - are needed to consider each of the impacts highlighted under each category below.

The proposed culverting of the Longford and Upper Duke of Northumberland's Rivers as they cross beneath the runway is a major direct impact of the proposals. These two rivers are both high value environmental corridors for the migration of birds, fish, mammals and flora within an otherwise largely urban and impermeable environment. The culverting of a river has a fundamental detrimental impact upon its value over the reach being culverted and, dependent upon the length of the culverted section, upon its value as a conduit for wildlife movement. It is for this reason that river culverting, of the length proposed under this scheme, is almost unheard of in the last 50 years in the UK and that many rivers that had been culverted in previous eras are now being taken out of culvert. This proposal is therefore a major detrimental environmental impact of the scheme.

The value of the Longford River corridor as a conduit for wildlife is not well known to FORCE. However, there is strong circumstantial evidence of the value of the Upper Duke's River derived from the 2011 Crane pollution event. This event wiped out all the fish life in the middle and lower Crane following the release of a large amount of raw sewage. In the year following the event a number of large fish were spotted in the lower Crane – including pike and large perch. The upper Crane is too small to harbour large fish and a series of weirs stops any recruitment of fish from the Thames – therefore the most likely explanation is that these fish were entering the Crane from the Colne and via the upper Duke's River. Further evidence from the Citizen Crane project shows the high quality water, and relatively healthy invertebrate counts from the Upper Duke's River, supporting the idea that this conduit acts to replenish the Crane with aquatic life.

The culverting of the Upper Duke's River would have a major detrimental impact upon the recruitment of fish and other aquatic life into the River Crane, as the culverts would act as a barrier to migration. Given the barriers to movement at the base of the Longford then there are likely to be similar impacts on the lower reaches of this river, including upon Bushy Park and Hampton Court, caused by a culvert acting as a barrier to migration.

The new runway would also act as a physical barrier to the movement of people along these corridors. The corridors are not well used for walking and cycling at present due to their unfriendly design and management. However, there is great potential to enhance their use – as explained below – and this potential would be lost with the imposition of culverts.

Both rivers are features of considerable historical importance, the Upper Duke's being constructed in the 1500's and the Longford on the 1600's, and culverting may well lose features of historical importance and interest.

One such feature is the bridge over the Upper Duke's River in Harmondsworth, believed to be of considerable age and shown in Figure 2 below.



Figure 2: bridge over the Upper Duke's River in Harmondsworth

The overflying of an increased part of the Crane corridor is a further direct impact of the third runway proposal. As noted above the corridor is recognised by many local people as a place of relative tranquillity, of particular importance in an urban setting for physical and mental well

being. The proposal will result in a larger part of the corridor being overflowed for longer, as an inevitable result of greatly increased aircraft movements and the location of the corridor, close by and orthogonal to the direction of the new runway.

There may be further negative impacts on the opportunities for environmental improvement over a larger part of the river corridor as result of bird strike concerns following from the widening of the flight corridor. Given that the improvement of the river corridor by the provision of improved marginal wetland and open water habitat is a major opportunity for the Crane then this impact could also be considerable.

The provision of a third runway will result in further inevitable development pressures upon the remaining open spaces in the surrounding area. This impact could be very severe on the integrity of the open spaces along the Crane, Longford and upper Duke's Corridors. The projections coming from HAL indicate major infrastructure developments with new industries to create large numbers of new jobs, hotels, new transport infrastructure and housing all projected to increase considerably. When combined with proposals to relax green belt and Metropolitan Open Land (MOL) protections being put forward by local authorities, then the consequences could be even more severe.

The potential of this has been witnessed to some degree already with the proposals emerging from the Feltham Masterplan and the Hounslow West Area Plan. Both areas are well to the south of the proposed runway but are being developed to some degree in line with the future growth projections resulting from third runway development. In both cases large areas of open space are being identified for development, notwithstanding long sacrosanct protections of green belt and MOL status. Such development would reduce considerably the integrity of the green corridor network and the value of the open spaces available to the communities of west London.

It is also noted that the area around Heathrow has been earmarked as an area of opportunity for development growth by the GLA – and this will inevitably lead to much increased pressure on the green infrastructure of the area.

The Third Runway will directly overprint the Colne valley, putting around 300 to 400 hectares of the Colne Valley Regional Park directly beneath the runway along with the high quality chalk fed Rivers Colne and Wraysbury. Other parts of the Colne Valley will be greatly affected by increased noise as well as associated development pressures. These impacts are not within the direct remit of FORCE. However, the Colne is our neighbouring catchment to the west and the two catchments have been twinned as part of the GLA's All London Green Grid process.

These impacts are a fundamental concern for the Colne River, severing the lower catchment and the River Thames from the upper catchment and the Chiltern Hills. FORCE is concerned for the fate of this neighbouring catchment and objects in solidarity to these existential impacts. FORCE is in regular liaison with the Colne Valley Regional Park and supports their objections to the scheme and their proposals for mitigation, including a green infrastructure masterplan for the entire area being affected (see also the proposal set out below).

FORCE has tried to engage with HAL over the last couple of years regarding the concerns set out above. However, to date there has been no substantial response and there is nothing seen to date in the development proposals that addresses these fundamental issues.

For these reasons FORCE is opposed to the Third Runway development as it is currently proposed

6. Mitigation Opportunities related to 3rd Runway

The direct and indirect impacts of the Third Runway development upon the environmental and community value of the River Crane, Upper Duke's and Longford rivers and their associated green corridors are potentially major. It is important that mitigation opportunities are identified and implemented at an early stage in this process to allow them to be factored into the wider planning for HAL and other interested parties. This section of the response identifies options that meet FORCE's requirement to provide both environmental AND community benefits as part of any development. These options address questions 4 and 5 of the response paper

The mitigation options identified below are considered in three categories:

- Environmental benefits to the river corridors and associated open spaces
- Green access routes - better utilising the green corridor network to link communities with each other and Heathrow
- Sustainable long term management of the open space network with consequent benefits to the environment; social cohesion and community value; health; education and training; and employment

Environmental concerns are fundamental to the viability of the third runway proposals. As well as the impacts identified above there are the broader impacts on human health and community value caused by noise and air quality from both increased flight numbers and associated infrastructure growth. There are though also opportunities to enhance the local environment that are in the gift of the Heathrow authorities as part of any development and these include:

- **Widening the open corridor along the Heathrow boundary for public access.** The available corridor along the eastern boundary of the Heathrow site is very narrow and difficult to navigate, particularly

during high river flows. Moving the boundary back to the west would help to open up this part of the corridor to the benefit of local people and (with appropriate management) wildlife

- **Better use of the Heathrow run-off to benefit river flows in the middle and lower Crane.** At present around one third of the run-off from the airport goes into the Crane and for the most part this benefits the river. The Crane is subject to very low flows in the lower reaches through Twickenham and St Margarets and would benefit greatly from increased inputs, particularly during these low flow periods. Options include – increasing the proportion of the run-off from the existing airport; transferring run-off from new hard standing areas created as part of a third runway; and better using the storage within the system to support low flow periods. This would need to be combined with improved treatment systems as proposed for the eastern balancing reservoir.
- **Mitigate the impact of culverting the Longford and Duke's River through appropriate design.** Options may include the design profile of the culvert, incorporation of light portals and minimising the length in culvert
- **Engaging with river and open space improvement schemes in the surrounding river corridors.** For example, there is scope to remove the Longford River from its culvert through Hanworth Park in Feltham

Transport issues are also a key aspect of the project viability and the provision of green transport options need to be a key aspect of the scheme. At present it is both difficult and dangerous to try and access the airport by foot or by bicycle. The routes are poorly signposted, are not continuous and have major interactions with fast moving traffic.

There is though a major green network local to Heathrow provided by the river network and its associated open spaces. This network has improved considerably in quality and permeability over the last five to ten years. However it remains incomplete and unsatisfactory as a viable walking and cycling network.

There is scope for major investment in this network to:

- **Provide a green transport alternative for workers and some passengers wishing to access Heathrow**
- **Provide a major enhanced asset for all the communities in the vicinity of Heathrow** to access their local open spaces and use these to go further afield, linking communities and open spaces together across the region
- For this to be designed in such a way that **the environmental value of these corridors is also protected and enhanced**, allowing local communities to move around through a high quality environment, benefiting their physical and mental well being

The network is illustrated in Figure 1 and includes the corridors of the River Crane, Longford, Upper Duke's and Lower Duke's Rivers; and providing green and off road linkages to the River Colne, River Thames, River Brent and Grand Union Canal corridors. Between them these corridors link most of the communities adversely impacted by Heathrow – and linking these communities to their own spaces as well as iconic open spaces such as the River Thames; Bushy Park and Hampton Court; Black Park and Colne Valley Regional Park; Hounslow Heath; Kew Gardens and the Chiltern Hills.

There are a number of breaks in the network at present caused by road crossings and areas where the green space is poorly managed and pathways in poor condition or inadequately designed. It would therefore require a level of investment to overcome these issues – but a level of investment of small order compared to the overall transport budget for the project and with major new benefits for all the local communities surrounding the scheme.

The management of the green corridors and open spaces of the Crane Valley has been developing over the last five years. There is a greatly enhanced emphasis on partnership working through the CVP – both to access new funding streams and to implement collaborative projects. There is also a new enthusiasm for engaging the third sector with the delivery of projects. These include both the use of volunteers to implement improvement works as well as the engagement of a wide range of third sector organisations to enhance community access and appreciation of the open spaces through sport and leisure activities, walks and talks, community education and citizen science programmes for example.

This approach is greatly enhancing public engagement with these open spaces, with public use going up by orders of magnitude in those areas improved; reduced anti-social behaviour and increased pro-social behaviour. The approach is deemed to be more sustainable and, through engaging the local community, provides associated benefits to health and well-being, community cohesion, education and training, and local employment.

FORCE strongly supports this approach and considers that delivering mitigation programmes by this means would greatly enhance the public engagement with these open spaces and the overall development process.

Further benefits of developing enhanced green corridors through the areas directly impacted by Heathrow are:

- Carbon offsetting of development – through enhanced green travel and carbon sequestration in improved green spaces

- Provision of specifically designated quiet areas for each community through the protection and improvement of the green infrastructure network
- Improved green spaces will benefit air quality throughout the region – through absorption of pollution
- Buffering the impacts of climate change – through countering the urban heat island effect; enhancing flood protection through improved marginal river storage and buffering; etc

These and other benefits need to be properly evaluated and optimised through an initial masterplan (as discussed below).

7. Delivery mechanisms

The focus of the Third Runway scheme to date has been on the impacts on noise, air quality, carbon emissions and other aspects where there is very little scope for local community engagement other than outright protest. By contrast the impact upon the open space and river environments, whilst also profound, has been relatively little considered, and this is strongly reflected in the NPS.

In contrast to the air quality and noise impacts these river and open space impacts can potentially be mitigated, with early engagement and investment, along with longer term care and consideration. More especially these mitigations may also support the green travel agenda and provide a substantial positive legacy for the local communities throughout the impacted area via a new and enhanced network of green corridors and linked open spaces.

The first requirement is a wide ranging masterplan for the whole area covered by Figure 1. This plan would identify all the key impacts of the scheme proposals in broad terms and then focus on potential improvements to the environmental and community value of this green infrastructure network, building on the works already completed by the catchment partnerships in the catchment plans and All London Green Grid.

All the key interested parties need to be engaged in developing and critiquing this plan through some form of environmental forum that is not engaged on the noise and air quality issues.

These responses speak to Question 6 of the consultation response document.

These proposals require further development and discussion with key interested parties. FORCE is interested and willing to be fully engaged in these discussions as a community representative organisation and on behalf of the local environment. FORCE would welcome discussion and engagement from all other parties with an interest in enhancing the community and environmental value of these vital green corridors.

APPENDIX B

FELTHAM MASTERPLAN CONSULTATION - MARCH 2017 RESPONSE BY FRIENDS OF THE RIVER CRANE ENVIRONMENT (FORCE)

Friends of the River Crane Environment (FORCE)

FORCE was set up in 2003 and is a west London charity, entirely operated by volunteers, with around 500 members and a remit to protect and enhance the environmental and community value of the River Crane corridor.

The main focus of our work is on the lower Crane between Donkey Wood and the River Thames and therefore we have a particular interest in the proposals in the “Upper Crane Park” area of the plan. The Longford River corridor is also part of the River Crane catchment and we see there is a unique opportunity for improving this corridor through the Masterplan and we are therefore also commenting upon this aspect of the plan.

More information on our work and values can be found at www.force.org.uk

The River Crane Catchment

The River Crane rises in Harrow and runs for around 35 km through five west London boroughs (Harrow, Hillingdon, Ealing, Hounslow and Richmond), re-joining Hounslow before it enters the Thames in Isleworth. The catchment covers approximately 125 sq km and includes the Longford River, and the Upper and Lower Duke of Northumberland’s Rivers, as well as the Crane.

The Crane Valley Partnership (CVP) was set up in 2005 and includes the GLA, EA, the five boroughs (including Hounslow), Royal Parks, Thames Water and Heathrow, as well as FORCE and London Wildlife Trust, among its 26 members. CVP raises and invests funds to improve the quality and value of the river corridors for the benefit of wildlife and the local communities, and has seen investments of several £million over the last five years.

The River Crane corridor was named in the Middlesex County Plan as “the west London Green Chain” back in 1924, and remains as one of London’s most important green corridors, alongside the Thames, Wandle and Lea Valley. Detailed proposals for protecting and enhancing the value of this corridor are set out in the GLA’s All London Green Grid, part of the London Plan, and reflected in council planning policy and the Crane catchment plan, produced by CVP.

Feltham Masterplan - Overview

FORCE welcomes the Masterplan as a means of developing a coherent overall plan for the development of the Feltham area. The masterplan includes three large open areas of green space – the Feltham Parks area to the north, Hanworth Park to the south and the “upper Crane Park” area to the east. FORCE considers that the value and complementary interest features of these three areas to be a key aspect of the overall masterplan.

The Longford River runs through the centre of the Feltham Masterplan area and has considerable existing value and great potential as an enhanced green link between the urban centre and the two park areas to the north and south.

The River Crane runs through the eastern part of the area and FORCE welcomes this opportunity for Feltham to be better linked into the Crane corridor.

The two river corridors provide valuable green spaces assets and linkages for wildlife and people. They already provide wildlife and walking links between Feltham and Heathrow, Twickenham, Hounslow, Isleworth, and the green space and heritage assets of the River Thames and River Colne corridors for example.

The accessibility and public awareness of these assets and linkages could be greatly improved, at least in part through this plan. We have found that the availability of good quality leaflets, maps and signage, both as physical assets and on-line resources, all aid the public awareness of local open spaces, allowing them to see how they fit together. It gives confidence in how to access and use the open spaces as well as information about their historical and wildlife value.

Support systems can be produced in traditional paper form and on site notices and directional signage as well as in digital and downloadable form, downloadable when visiting the sites, and linked to existing on line information networks such as local web-sites, Facebook and Twitter pages, with well-established followings.

The development and improvement of open space value, and the linkages between them, is recognised as being of considerable importance to the sense of place for local people, enhancing how they value and link into their community, and supporting the physical and emotional wellbeing of the local community. The linkages also provide important green corridors for travel, both within the community and linked to the public transport network, easing congestion on local roads and enhancing public health.

Development on Green Belt and/or Metropolitan Open Land

FORCE is opposed to the principle of development of housing on Green Belt and/or Metropolitan Open Land. FORCE does not accept the arguments that:

- (a) housing development is necessary to generate income to manage green spaces or
- (b) housing development and associated overlooking is a benefit to the remaining green space

We note that the Masterplan includes proposals for around 5000 housing units and that most of these are not within Green Belt. The units outside of Green Belt will (a) generate a considerable amount of revenue and (b) require and/or benefit from the existing green spaces as their open space public assets.

Our experience over the last 15 years has shown that neglected open spaces can be greatly improved with relatively little investment, along with the long term engagement of the local community. These improvements lead to greatly increased public use which in turn greatly enhance their public value, which then improves the way in which they are used and

respected, in a sustainable virtuous cycle. This model of improvement has been shown to work in Crane Park (from 2011) and is currently also being applied successfully in Pevensey Road Nature Reserve.

The Impact of Overlooking by Housing

The outline masterplan puts forward the argument that overlooking by housing will improve the open spaces by providing a sense of safety and animation to them. In our experience this does not hold true. We are aware of local open spaces that are overlooked by one or more of housing, shops and/or main roads, but remain in a poor condition.

We do not believe that overlooking leads to automatic improvement – what overlooking will do though is remove or reduce the quietness and peacefulness of the open space. This sense of being “with nature” and “away from urban noise and bustle” is a key characteristic of some of the larger open spaces in this area. This characteristic is of great actual and potential value to the quality of life of local people, providing enhanced mental and physical well-being. This value is not being maximised at present as the spaces are under-used, but that is a reason to enhance their use and appreciation rather than to build on them.

Longford River

This river is a valuable wildlife and access corridor running through the centre of the masterplan area and a key heritage asset for Feltham. We welcome proposals to enhance the wildlife and green transport aspects of this corridor, and would support seeing this as a key component of the Feltham plan.

We understand that early efforts to engage with Royal Parks, as the owners of this asset, have not been successful. FORCE has good contacts with Royal Parks and we believe they would have a high level of interest in this opportunity as it would be of benefit to Longford River and its environmental value – also as an enhanced link between Feltham, Bushy Park and Hampton Court. Recent contacts with Royal Parks have revealed that they too have early plans for a masterplan focussed on the Longford River and there is therefore a great opportunity to link these two plans into a coherent overall scheme.

FORCE is very supportive of the proposals to remove the river from culvert through Hanworth Park and considers this could be a major benefit in re-vitalising this park and turning it into a “destination” open space. It has been suggested that this culverting is an important legacy of the use of the park as an airfield. In our view this is not a strong argument and, particularly given the amount of runway existing and projected within the local area (RAF Northolt as well as Heathrow) then to return an old airfield into a more natural open space (whilst also celebrating its aviation history) is a much more valuable and appropriate use of the Park.

Feltham Marshalling Yards

This is a major site within the lower Crane Valley and is also a Metropolitan Site of Importance for Nature Conservation in its own right. The site is recognised for its matrix of different habitats, resulting in large part by the process by which it was constructed from various types of inert infill materials in the early part of the 20th century, leading to the

development of a patchwork of different soil types suitable to a wide range of flora and fauna.

In recent years it has become more overgrown with silver birch and, ironically, its matrix habitat value has been maintained in part by the scramble bikes that visit there on a regular basis. These bikes fall into two main categories – serious bike people who travel from significant distances, often bringing bikes in the backs of their vans; and local kids who take advantage of the facility. It is the serious bikers who have been using the site for over 50 years, and resist any attempt to close it down, deploying angle grinders to cut through fencing for example.

Bikes have been a long term issue for this site. However, our experience in Crane Park downstream shows that by creating a space that more of the general public want to use then the bike problem does greatly diminish, because it is essentially not legal and they don't wish to be caught and have their bikes impounded.

There is another major legacy issue for this site, linked to the development of the post office sorting office on its eastern part in the 1990's. An agreement was reached between Network Rail and LB Hounslow, as part of the post office scheme, to transfer all the remaining 25 hectares of the marshalling yards site into public use as a park for a period of 25 years, and with around £250,000 placed in an Escrow account to support its long term improvement and maintenance. This scheme was drawn up but was not enacted, due to a dispute between the two parties as to who would take on the long term maintenance of the tunnels that pass beneath the site.

As it stands, the failure of this deal to be delivered has resulted in there being a major disconnect between the lower Crane valley and the high quality open spaces upstream in Brazil Mill, Donkey Wood and Hounslow Heath, continuing upstream for many kilometres to the source of the Crane in Harrow.

One legacy of this failure is an ongoing mistrust of major scheme proposals that promise public space improvements in exchange for development. This example is an illustration that despite best intentions, development can proceed without the delivery of the promised benefits. FORCE considers that the resolution of this historic agreement, and the provision of the public benefits due from the post office scheme, is an essential pre-requisite to re-building trust ahead of any further plans for this area.

FORCE welcomes the opportunity, afforded by the masterplan, to resolve this historical planning issue and potentially bring the site into public use as a high quality public open space, which would also link again Hounslow's two major areas of public open space along the River Crane.

FORCE is concerned about the potential of building houses on this site due to its status and value as a SMINC and as part of the overall Crane valley green corridor. However, FORCE would be very interested in seeing the open space transferred into the public domain, used and improved as a high value wildlife area and public asset, also providing improved links between Feltham and the Crane valley.

We can see the value in providing an additional bridge across the railway and into the site, but are concerned as to whether it represents good value for money relative to other improvement options, given the potential high cost.

De Brome Fields

These fields consist of meadow and acid grassland and are valuable habitats for the area. The space is much more used over the last couple of years following the creation of a new cycle path across it. FORCE has data from several public use surveys before and after the construction of this pathway showing the increase in use as a result.

FORCE is concerned about the potential of building houses on this site due to its status and value as green belt and as part of the overall Crane valley green corridor. FORCE would have particular concerns with these proposals due to the pressure which would result in further loss of high value acid grassland habitat related to public play space provision following on from any development.

Pevensey Nature Reserve

This is the third of the sites within the upper Crane Park area and is another high value matrix of different wildlife habitats including; River Crane and Mill Stream, backwater and pond habitats, all used by water vole and kingfishers; meadow with stunted oaks; flood plain and wet woodland; veteran fruit trees; rare black poplars; etc.

The value and public use of this site has increased considerably in the last few years due to the provision of a new cycling path, and the commitment of Hounslow Green Gym – a team of volunteers co-ordinated through TCV which has been meeting on site every week for over two years and slowly improving its environmental and community value. FORCE has survey data recording public use of the site over recent years.

This site links with Little Park on the other side of the river and managed by LB Richmond. The Little Park site has also been neglected in the past, although it is currently undergoing some improvement works. A new footbridge, linking the two sites and financed by LBR, is proposed in the next year, which would further enhance the public use of both sites.

Upper Crane Park

FORCE welcomes the proposals to group all these eastern sites together as an extension to Crane Park. We consider there may be value in considering these sites formally as an extension of Crane Park which already has Green Flag status in both LB Richmond and LB Hounslow. We also note that the local public have an attachment to the existing site names that recognise their historic interest and value. We would recommend retaining the existing names whilst also designating them as part of an extended Crane Park.

The community value and environmental interest of these sites could be developed by a cumulative series of small scale interventions designed to engage the local community, open up the sites to more public use and through flow, plus preserve and enhance their existing

environmental value. This approach would follow on from similar deliveries by FORCE with LB Hounslow, LB Richmond and other community partners elsewhere along the lower Crane valley. FORCE does not consider that the sites require or would benefit from any major public entertainment installations – although small scale and cumulative improvements to the amenity value of the sites would be welcome.

FORCE notes that the sites contain a matrix of different habitats with a large number of protected and high value species of flora and fauna residing there. We are not aware of recent mapping and survey work to catalogue the uses and value of these sites and consider this to be an important pre-requisite of any further plan developments on the sites.

Context of Heathrow

Heathrow provides an important context for the Feltham Masterplan and the three clusters of open space in particular. The Heathrow site lies within the Crane valley catchment and a third of the run-off from the Heathrow site currently enters the River Crane. Heathrow is an important member of the Crane Valley Partnership and makes a positive contribution to the activities of the partnership.

The Third Runway proposals represent one of the largest development proposals in the UK and a major challenge and opportunity for the environmental assets of the Crane and Colne valleys. The largest (and potentially devastating) direct impact of the proposals would be upon the Colne valley, but there would also be a major impact of culverting part of the Longford River (and Upper Duke of Northumberland's River) as well as further noise and air pollution issues along the Crane Valley. It is also likely that further housing and associated infrastructure development in the surrounding area would follow any third runway at Heathrow.

Any development at Heathrow is likely to require major environmental mitigations to counter a range of major environmental impacts. The development is also likely to look with interest at any proposals to improve the green transport corridors by bicycle and foot that would link with the Heathrow site.

FORCE considers that the green spaces within the Feltham Masterplan area are likely to increase considerably in their importance and value as green infrastructure assets for the borough in the wake of any development green light at Heathrow. Working together with the Crane Valley Partnership, there is considerable scope for procuring investment for large scale improvements of these assets, to enhance their environmental and community value, and as green links for Heathrow and the towns and communities affected by it.

Next Steps

We have put forward suggestions for helpful next steps to aid the development of the proposals set out in the masterplan. FORCE would be happy to discuss the development of these steps with the council and planners.

1. Engage with key interested parties such as Crane Valley Partnership, Heathrow Airport Ltd, Royal Parks and LB Richmond for example – to assess how the masterplan will best link with their own aspirations for these and adjacent open spaces.

2. Re-visit the Feltham Marshalling Yards POSO scheme and associated agreements with a view to resolving this as part of the Feltham Masterplan scheme
3. Collate existing environmental habitat and species surveys and commission new ones to fill in the gaps. Map the areas in terms of their environmental value and matrix of habitats and species
4. Identify the destination locations within and outside of the masterplan area and compare these with (a) the open space network and the actual and potential walking and cycling routes and (b) the public transport network so as to develop useful linkages using these open spaces
5. Assess the current public usage of these areas – and look at other comparable areas to assess the potential level of usage and the infrastructure and associated investment requirements to achieve this
6. Trial some early interventions to test and develop public interest in these open spaces. Ideas for these are provided below

Small Scale Early Interventions

FORCE supports the proposal for small scale initial interventions to engage local communities with the potential benefits and opportunities associated with the Feltham Masterplan. Key opportunities would include:

1. Volunteer days – engaging local people with the value of the sites whilst helping to improve them. Note that FORCE is running a volunteer day in Pevensey in April 2017. Volunteer days on local open spaces can also be set up working with conservation groups such as TCV, LWT and Green Corridor, as well as local groups such as Friends of Bridge House Pond (FBHP)
2. Green Gym – publicise and support the existing green gyms in Pevensey and Hounslow Heath managed by TCV. Support the creation of new green gyms for other open spaces in the area
3. Support the development of new Friends groups. Open spaces need Friends groups. SW London Environment Network (SWLEN) is already engaged supporting LB Hounslow's Friends groups. There would be great value in supporting new or extended friends groups in this area – particularly for sites such as Hanworth Park and the north Feltham sites
4. Walks and Talks – these are run to engage local people in the value of their local open spaces. Events can focus on environmental or heritage value for

example – or just introduce people to the areas through walks or cycle rides etc. There are existing groups including FORCE, Hounslow Cycling Campaign and FBHP, interested in running and supporting such events

5. Engagement through local schools – outdoor learning events such as those run by FORCE and others with local Hounslow schools. This has been shown to be a great way to engage young people, and through the children their families, in the value of local open spaces
6. Support to a “Park Run”. The Crane Park park run routes through the Hounslow and Richmond sides of Crane Park between A316 and Hanworth Road. It was set up around five years ago and has proved a wonderful means of engaging young people and families in the value of the park and is now used by 100 to 200 people each Saturday morning. Creating a new Park Run location further upstream would engage people in these other sites and build upon the success of the Crane Park event
7. The development of leaflets and signage. Whilst the main efforts regarding signage may follow on from the delivery of key parts of the plan, an initial map and leaflet focussed on these spaces and how they link to Feltham, available to local communities, could be of great value in engaging local people about the proximity and value of these key assets. It would also provide an opportunity to actively engage with local people about their potential and how this might be realised

FORCE would welcome the opportunity to discuss these and other opportunities with the project team.