

HOUNSLOW WEST OF BOROUGH PLAN REVIEW

RESPONSE BY FORCE

Introduction

This document has been prepared by Friends of the River Crane Environment (FORCE) in response to the Issues Paper produced by LB Hounslow for the west of Hounslow Borough. This document is laid out to reflect the key issues raised by the document that are relevant to FORCE and our Objects; “to protect and enhance the environmental and community value of the River Crane and Duke of Northumberland’s River corridors”.

FORCE is an environmental and community based charity, founded in 2003 and with over 500, mostly local, members. More information on the organisation can be found at www.force.org.uk

Much of the area addressed by the west Area plan 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.

FORCE is very concerned about the nature and implications of the proposals set out in this document. We are particularly concerned by the emphasis on urban growth and utilising green belt and related open spaces to achieve this – and without any evaluation of the value of these spaces and how this value can be improved for the benefit of local communities. FORCE considers this approach is contrary to the best interests of these spaces and the local communities they serve – and also contrary to local, regional and national planning policy.

Issue Three: Green Belt Designation

We consider the terms in which this discussion are couched are not helpful. The document notes that:

- (a) National Planning Policy states that “*the essential characteristics of green belt are openness and permanence*”
- (b) The London Plan “*does not advocate releasing land from the Green Belt for any purposes. (Development should not encroach onto the Green Belt; inappropriate development should be refused, except in very special circumstances) and it expects that land for homes and jobs and other purposes can be found without the need to use Green Belt land*”

Despite this clear guidance from National and Regional policy the document seeks to promote the removal of Green Belt designation from large parts of the west area – and associated maps include proposals to develop these areas.

These proposals are justified by the proposal on the presumptions that (a) there is an over-riding need for growth, increased employment and housing in the west area and (b) these needs cannot be met within the existing designated areas. There is however no strong rationale presented to support these presumptions –which are then the starting point for the arguments set out in the document.

The removal of green belt from large parts of the west area – along with their subsequent development – would be a major concern for FORCE. Not only due to the loss of these open spaces, which have helped to preserve the open character of the area, but because of the precedent this would set and the consequent vulnerability of green belt designations throughout this borough and the rest of London. It is of particular concern that this attempt it being made without any justification in terms of the value of these open spaces in particular, and the over-riding value of green belt as a concept for London. We would note in this respect that Green Belt needs only meet *one or more* of the five purposes for which it can be designated. This fact is not made clear in this Issues document.

FORCE considers that any review of green belt across the western part of the Borough should also consider the actual value of this green belt land *and* (probably more importantly) its potential for enhancement to meet the environmental and community needs of the borough. This approach would be consistent with much of the existing policy and associated documentation put in place by the Borough. To cite just one example; Hounslow Together’s “Vision Strategy and Action Plan” produced on behalf of the Borough and its Local Strategic Partnership sets out a vision for the Borough in 2030 whereby its green spaces are protected and enhanced http://www.hounslow.gov.uk/future_borough.pdf

The actual and potential value of this open space *as* open space is not considered by this Issues document. There is probably much common ground between the council and FORCE regarding the under-utilised and poor state of some of the open space in the west of the Borough. However, in our view this presents an opportunity to review these spaces and consider how they can be better utilised *within their Green Belt designation* so as to provide an enhanced asset for the borough. There is considerable potential for improved utilisation and management of open spaces to provide enhanced community, green transport, social, educational, training and employment uses, whilst both maintaining and enhancing the environmental value of these spaces. There are good examples of where this has been done elsewhere in the Crane valley as well as in other parts of the UK.

This policy review provides an opportunity to do this – at the same time avoiding costly and politically difficult challenges to green belt status - and we would be very supportive of this opportunity being taken.

Issue 4 – Heathrow

The Heathrow site lies partly within the River Crane catchment and the site affects the value of the river corridors in the following ways:

1. Around a third of the airport runoff drains into the River Crane. For most of the year this run-off is benign to beneficial to the overall water quality of the river. However, during cold periods, the use of de-iceant at the airport can result in major outbreaks of sewage fungus in the river downstream of the outfall with consequent negative impacts on the ecology of the river. There is a significant risk of this occurring each winter and it last occurred in February 2014.
2. Aircraft overfly the central part of the river corridor at low level – and this greatly impacts the peacefulness of the corridor for visitors – the impacts being both noise and air quality
3. This central area is also subject to restrictions in the nature of environmental asset that can be created such that it does not increase the risk of bird strike
4. The upper Duke's River and Longford Rivers were both diverted around the south western side of the airport as part of the Terminal Five development. The upper Duke's River feeds good quality water directly into the River Crane at Donkey Wood from the River Colne to the west whilst the Longford is part of the wider Crane catchment. Note that the Third Runway proposals would likely necessitate large lengths of both rivers being put into culvert, thereby greatly impacting their intrinsic value and their value as movement corridors for fish and other wildlife.
5. Heathrow owns a significant amount of land around the airport, including within the River Crane corridor and along the Longford and upper Duke's River corridors

Heathrow Airport Ltd (HAL) is an active member of the Crane Valley Partnership (CVP), an organisation with 21 members including: LB Hounslow and the other four London Boroughs in the catchment (Richmond, Hillingdon, Ealing and Harrow), the GLA, Environment Agency, London Wildlife Trust, FORCE and all other parties interested in the value of the Crane catchment.

HAL has worked to mitigate the impact of its activities – for example:

1. Investing in water treatment and associated technologies to reduce the impact of de-iceant on the river. These technologies are due to be fully implemented in the next year or so
2. Supporting the management costs of the CVP
3. Working with partners to increase the environmental and community value of parts of the Crane corridor within and local to its control

There are a number of other opportunities for HAL to enhance the value of the catchment such as:

1. Reviewing the management of site run-off so as to maximise the flow benefits into the river – particularly during low flow periods
2. Further works to improve the value of the river corridors (Crane and Dukes/Longford) for walking and cycling. FORCE has promoted the concept of an orbital green corridor for the airport. An orbital network of high value environmental corridors that would encircle the airport and also provide good quality walking and cycling access into the airport.

Issue 4b in the document considers surface access around the airport. However it does not mention walking or cycling access to the airport. An orbital green corridor could provide a means of circulating cyclists and walkers to different parts of the airport and allowing local airport workers (as well as airport users) a healthy and pleasant alternative to road or rail access to the airport. The network would need to utilise and improve the environmental value of the Crane (to the east), Duke's and Longford corridors (to the south), Colne (to the west) and Harmondsworth/Grand Union corridors (to the north).

Issue 4c in the document talks about noise and air quality, both from aircraft and surface traffic. These issues can be mitigated in part by improving the environmental value of the local open spaces. Retaining and improving these open green spaces will help absorb some of the air pollution whilst also providing high quality space for people to find respite from urban noise. These spaces thereby have enormous potential value from a physical and mental health perspective. On the other hand, the proposals as set out, to remove many of these open spaces, will further exacerbate the environmental and community issues caused by the presence of the airport.

Issue 7 - Open Space

This issue is titled "Enhancing the natural environment and open space". However, the biodiversity and environmental values of the spaces are not mentioned in the text and the three questions do not address enhancement so much as reduction in open space. Maps that have been produced associated with this report earmark large areas of existing open space for development. However, this is not mentioned in this section and this omission appears disingenuous at best. Nowhere is the amount of open space that would be lost if these plans were to be fully implemented listed or quantified. Without this information it is not possible for the public (or other interested parties) to appreciate the implications of what is being proposed.

The values of open space are not addressed in this report. There is no doubt that some of the open spaces in the west of the Borough are not well used nor well managed or maintained. However, this surely presents a major opportunity to enhance their value and use. These open spaces are a major under-developed asset for the borough – not in their land sale value but in their potential for improving the quality of life for the local population.

At a regional level the potential of open spaces, enhancing their use and value, is starting to be appreciated through documents like the GLA's Green Infrastructure Taskforce review. This review states that, as London's population grows, the need for high value and high functioning open spaces with improved environmental as well as community and social value, will also grow.

It is imperative in our view for LB Hounslow to start to address how it can better manage and link together its open spaces to meet future needs. To build over large parts of this space would be to lose forever this opportunity to create a better environment for future generations.

It is ironic in a way that the Heathrow Vision talks in terms of a “Garden City” and yet the thrust and implications of this document appear to be working against the spirit of a garden city, whereby green spaces would be an intrinsic part of the whole. A further irony is that the Third Runway proposals, which would pave over a large area to the north of the existing airport, and which would need to pass major environmental hurdles to be permitted, are used here to support an argument for paving over large areas to the south of the airport.

In our view there is an urgent need to review the value and nature of the green and open spaces across the western part of the Borough. The purpose of this review would be to assess how they may be enhanced and managed to create better green corridors, links and green assets for the local communities they serve. This review would look at existing corridors and how barriers to permeability can be removed and reduced; it would acknowledge and seek to enhance the potential of green spaces as social, educational, economic and health (as well as environmental) assets; and it would look to work with existing schemes and projects (and create new ones) that are seeking to enhance these values in largely self-funded ways.

Issue 9 – community infrastructure

Community Infrastructure includes the open spaces that the community use (or could use) but this aspect of community infrastructure (the *green infrastructure*) is not addressed in the report. This omission seems particularly stark given the proposed objective of a *garden city* type development. In our view green assets need to be integrated into any assessment of community infrastructure. These open space assets are not just for rest and relaxation. They are also (or can be) used as outdoor classroom and training areas; provide major health benefits; and act as green transport corridors. The management and engagement of local people with their open spaces can also generate good quality sustainable employment through the delivery of education, training, land management and health benefits for example.

Issue 10 – Heritage

The heritage section acknowledges the importance of the Crane corridor and the All London Green Grid – for which we are grateful. It does not however acknowledge the importance and value of the Duke’s River and Longford River corridors. These are of considerable heritage importance, as man-made channels constructed in the 16th and 17th centuries to convey water from the River Colne to the River Crane and Hampton Court respectively. They also have great potential as present day walking and cycling corridors for local people, linking the Crane corridor with the great expanses of the Colne corridor to the west and the Thames to the south.

Issue 11 – Making it Happen

The document focuses on the release of sites for development and the associated transport infrastructure needs. However, the last sentence of this document states that; “*we must also be aware of the environmental impact it could have and seek to ensure that*

development brings with it improvements that will benefit our residents and their quality of life”.

There are though no proposals in the document to investigate how this can be achieved. We believe there is an urgent requirement for LB Hounslow to review how it can best enhance the value of the network of open spaces across the west of the Borough to meet the needs of a growing population and to mitigate the impact of associated development. This review would assess the current value of these spaces and how this value can be enhanced environmentally and also to better support the transport, social, health, education and economic needs of the borough now and in the future.

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