

Matthew Rees
Planning Officer
London Borough of Hounslow
Civic Centre
Lampton Road
Hounslow
TW3 4DN.

13 July 2018

Dear Mr Rees,

System Reference: P/2018/1927
Planning Reference: 00504/AE/P21:
SEGRO Park Heathrow, Ariel Way, Hounslow TW4 6JW

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

I submit the following comments on the above planning application, on behalf of the Friends of the River Crane Environment (“FORCE”). Our comments are structured as:

- Introduction to FORCE
- Comments on specific aspects of the proposals
- Considerations concerning Section 106.

1 Introduction to FORCE

FORCE is an environmental and community based charity, founded in 2003 and with over 500 members, most of whom are local within the London Boroughs of Richmond upon Thames and Hounslow. 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. More information on our organisation can be found at www.force.org.uk

SEGRO Park Heathrow (‘the Site’ hereafter) is a very important location for FORCE, as it:

- abuts directly onto the River Crane for some 300 metres between the A30 and the A312, via the Causeway Water Meadows
- links via the River Crane upstream with the 58-hectare Cranford Park, which is in the process of major restoration funded by the Heritage Lottery Fund and Big Lottery
- links directly via the River Crane downstream with Donkey Wood and Brazil Mill Wood, which are the focus of local initiatives to improve their environmental and community value for residents
- is adjacent to Heathrow Airport, for which improvements to local air quality, connectivity and green spaces are issues of significant resident concern in both ongoing operations and potential expansion
- is already designated partly Metropolitan Green Belt and partly as a Locally Significant Industrial Site.

The SEGRO scheme represents a major development proposal within and adjacent to the River Crane corridor. The key requirement (in line with our Charitable Objects) in order for

FORCE to support any proposal within or adjacent to the River Crane corridor is for the proposal to provide clear net benefits to the environmental and community value of the river corridor. FORCE met with SEGRO representatives in August 2017, and we have had constructive correspondence with them subsequently. SEGRO are aware of our aspirations and concerns for the Causeway site and its links with adjacent green spaces and initiatives. It is against this background that FORCE submits the following comments.

2 Comments on specific aspects of the proposals

These comments concern:

- Development of Green Belt
- Landscaping
- Site Drainage
- Wildlife
- Public Transport Accessibility
- Landscape and Management Plan for the Site.

2.1 Development of Green Belt

FORCE recognises that this site was previously developed, and that both the London Borough of Hounslow ('LBH') and the Greater London Authority have been satisfied that 'very special circumstances' have been demonstrated through the submission to justify development in the Green Belt in line with national planning policy guidance. Nevertheless, the development of Green Belt and Metropolitan Open Land is a major issue for FORCE, due not least to the issue of precedent with respect to this fundamental protection of open spaces along the entire river corridor. FORCE is opposed to the re-designation of the Green Belt proportion of this Site as Metropolitan Open Land. Whilst 'the supporting text to Policy SV2 (West of Borough Plan) confirms that the western area has a strong logistics and warehousing market creating some of the most valuable industrial land in Europe' (Planning Statement 5.5), FORCE also contends that LBH has a responsibility to protect the needs of residents for quality open spaces to promote their physical and mental health, particularly when faced with the forecast 22%-74% increase in logistics buildings outside of the airport perimeter by 2040.

The current planning application for a single large unit supersedes application Planning Reference 00504/AE/P20 for five industrial units on the same site. In response to concerns raised in that application regarding the loss of Green Belt designated land, SEGRO proposes to step the fence-line of the development back from the river corridor to the top of the newly created bund on which the new building will stand. This stepping-back creates a new area of publicly accessible land, of approximately 0.53 hectares. FORCE supports this stepping back of the fence-line. We understand that the land will remain in SEGRO's ownership and that no public rights of way are anticipated. FORCE would support, and would be pleased to participate in the development of, a detailed landscape and management plan for the new area, within the context of the overall Causeway Water Meadows site, that might provide a pathway linking the new area with the existing riverside pathway, and seating.

FORCE supports the proposal to locate the unit centrally within the Site, away from the planted site boundaries.

FORCE also supports the proposed £40 000 contribution towards improving the existing Green Belt (App 10, Officer's Report for Planning Permission 00504/AE/P20 (7.11)).

However, we believe that this money should not be spent on control of invasive species, but that control of invasive species should be separately funded, and the £40 000 should be spent on other landscaping improvements in the Causeway Water Meadows site.

2.2 Landscaping

At 20 metres in height, the proposed unit will clearly have a visual impact upon the Crane valley. We therefore support the landscaping proposals in (4.13-4.17) of the applicant's Planning Statement, including the creation of a wide buffer zone between the development and the River Crane Corridor, the use of complementary plant species in this buffer zone, the increase in the net gain of trees on the Site from 244 to 288, and the allocation of £40 000 of Section 106 funding for enhancements to River Crane landscaping (not to the control of invasive species). We understand the constraints on planting diversity imposed by the London Heathrow Airport Safeguarding Team, but within these constraints would nevertheless seek the planting of a variety of native species to promote wildlife enhancement.

2.3 Site drainage

FORCE welcomes SEGRO's proposals for a line of scrapes and swales linked to the drainage outfall (drawing 713.10.06 in 2017). We would be happy to engage with SEGRO and LBH to optimise the value of this scheme – potentially also using land in LBH ownership closer to the river – if and when the scheme moves forwards. FORCE also supports the proposal for porous pavements for car parking spaces on the Site.

2.4 Wildlife

FORCE notes that the Ecological Appraisal concludes that 'the site has no significant wildlife interest.' We contend that the appropriate response is not to perpetuate the status quo, but instead to undertake measures that will enable the Site to deliver to its wildlife potential. The entire Crane corridor has value as a wildlife corridor. For example, over recent years the spread of water voles, a protected species, has been recorded in both the Crane and the Duke of Northumberland's Rivers, and FORCE has participated in active measures to encourage their establishment and migration. FORCE believes that such measures should be pursued in the management of both the landscape and the River Crane through the Causeway Water Meadow site. FORCE would be pleased to advise and participate in the implementation of such measures.

FORCE notes the conclusions of the applicant's Bat Survey that there are no features for roosting and no evidence of foraging bats at this Site. FORCE welcomes the configuration of the external lighting scheme to limit light spill into the Green Belt to the standard required by the Environment Agency for a buffer zone adjacent to a riverbank. FORCE also welcomes the use of LED luminaires and backlight shields. We would seek to ensure that noise and emissions from warehouse operations and from the buildings' heating and cooling systems are also minimised, to reduce noise intrusion into the corridor particularly during Airport curfew hours.

2.5 Public Transport Accessibility

The review of the Site's Public Transport Accessibility Level found that the Site is accessible from the surrounding areas by walking and cycling and there are viable options for accessing the Site by public transport. FORCE's experience is that walking and cycling along the extremely busy roads that serve the Site is both unpleasant and dangerous. We believe that

the proposal should include positive measures to facilitate safe and high-quality access to the Site for pedestrians and cyclists. Such measures would include improvement to the pathway through the Causeway, improved cycle lanes on the adjacent roads, and investment in particular in facilitating safe pedestrian and cycle crossings of the A312 and A30, including improving the route under the Causeway bridge and, in conjunction with TfL, providing either a footbridge, a pedestrian light-controlled crossing or increased clearance under the current A30 bridge over the Crane. The A312 and A30 may constitute ‘excellent links’ for the Site, but they form significant severance obstacles for pedestrians and cyclists using the River Crane pathways for greener transport or healthy leisure between the London Boroughs of Hillingdon, Hounslow and Richmond upon Thames. Improved pedestrian and cycle access via the River Crane corridor would make a significant contribution to the improvement of air quality in the vicinity of Heathrow Airport.

2.6 Landscape and Management Plan for the Site

The ongoing management of the landscaping around the site will be critical to its ongoing environmental and aesthetic value for the River Crane corridor. In this context, FORCE is pleased to note that SEGRO proposes to retain land ownership and take responsibility for its management through its landscape management contractor. We have made some proposals below as to how these might be developed into an overall management plan for the larger site area, including the Causeway Site, regardless of the final S106 agreement.

We envisage that a detailed landscape and management plan will be developed if and when the project goes forwards, incorporating pathways, benches and bins as well as new and improved environmental features. We welcome proposals to incorporate a public bench within the new open space. We would also support the provision of interpretation boards to promote better understanding of the environmental value of the Causeway Site, and the provision of way-marking signage to improve awareness of and facilitate pursuit of linkages to other sites along the River Crane corridor. We look forward to liaising with SEGRO regarding management programmes to ensure a co-ordinated approach.

FORCE is concerned that proposals to include bee hives, though welcome in principle, may not be practicable in a public open space, and that the proposed security fencing may be incompatible with the character of the open space.

3 Considerations concerning Section 106

This section considers:

- The context of the Site for Section 106
- FORCE suggestions for Section 106.

3.1 The context of the Site for Section 106

1. The site is immediately adjacent to the Causeway Water Meadows site (a public open space site on both sides of the river between A312 and A30). This site is in a central part of the Crane valley. Although ‘the Site is...assessed as having a low landscape sensitivity due to its low value and low susceptibility to the type of development proposed’ (Planning Statement 7.10), FORCE regards the Site as a potentially high value environmental asset and community open space, if managed appropriately.

2. Directly downstream of the site is the Donkey Woods site and downstream of this are a continuous corridor of open spaces along the river for around 15 km to the River Thames in Isleworth. Upstream, above the A30, is further open space leading directly to the Cranford Park site and a further corridor of open spaces leading to the source of the Crane at Headstone Manor in LB Harrow, around 20km to the north. Cumulatively the Crane valley comprises around 1500 hectares of linear open space, one of the major green corridors of London, known since the 1920's as the "West London Green Chain".

The environmental asset of the Causeway Site is enhanced due to its role as a green corridor in an urban setting. Key animals that use the River Crane corridor include: bats (nine species noted along the lower Crane to date); kingfishers; water voles; eels and some 15 species of coarse fish; water rail and reed buntings; buzzards, tawny owls and sparrow hawks; grass snakes and slow worms etc. The corridor also supports a matrix of wildlife habitats. The Causeway Site itself has potential as a high value river, flood plain, wet woodland, pond, wet meadow and wetland habitat.

The corridor has immense potential as a community and environmental asset, but this value is not currently being fully realised due to a lack of linkages and integrated management, public engagement and awareness. One of the key breakages in the whole chain is the A30 crossing – which currently requires a major detour along an unattractive major road. The A312 crossing to the south is a lesser but still significant obstacle to easy transit along this part of the corridor.

3. There have been considerable improvements in the value and public awareness of the Crane valley asset over the last 10 years – much of it achieved through cumulative works co-ordinated through the Crane Valley Partnership (CVP). This partnership includes some 26 organisations – including all five west London boroughs along the Crane (Hounslow, Richmond, Hillingdon, Ealing and Harrow), GLA, Heathrow and Thames Water, Environment Agency and LWT as well as FORCE. CVP proceeds by practical actions delivering benefits on the ground with a minimal level of bureaucracy and has to date helped to invest over £2m in the Crane valley.

The Crane catchment plan and the All London Green Grid plan (Area 9) are two key documents setting out objectives and practical projects for improving the Crane valley. CVP are currently updating their overall vision for the catchment with a new ten year plan.

4. The middle reaches of the Crane have limited public use and engagement at present. In common with all other parts, it would benefit from further practical conservation work and associated community engagement to create a critical mass of public enthusiasm and interest in the site. In our experience this mix, once achieved, results in an order of magnitude increase in public use of the site with a consequent increase in the value and appreciation of the open space. This would also have clear benefits to the owners and users of adjacent properties – as it would help create and maintain a high value open space adjacent to the site.

One feature of this part of the river corridor is that much of the land has industrial and commercial uses rather than residential – although there are large residential areas within a longer walk or short cycle ride of the area. There are therefore particular opportunities for

engaging with the industrial and commercial sectors through any improvement works on this and adjacent sites.

3.2 S106 Suggestions by FORCE

Given the characteristics set out above, we suggest S106 monies could help support:

- (a) improvements to the Causeway Water Meadows site itself
- (b) linkages to the upstream and downstream sites for wildlife and people; and
- (c) engagement in the Water Meadows and adjacent riverside open spaces by local communities, including the commercial and industrial sectors.

We have set out some suggestions below:

1. **Management and maintenance of the open space.** There is a major opportunity to integrate the management of the spaces within the site, particularly along the western margin of the site, with the public open space along the Causeway site. The first priority would be to develop a management plan for the entire Causeway Water Meadows site (including public and private spaces). Statutory duties (SEGRO and LB Hounslow council as land owners) could then be supplemented by a programme of volunteer events that could over time both maintain and cumulatively improve the environmental and community value of the site.

An extended programme of events – say one or two a month – could make a major cumulative beneficial impact to the Causeway site. There is a particular opportunity at this site to engage with local commercial and industrial organisations as well as the wider community, undertaking corporate (including CSR) as well as community volunteering, to be managed by an experienced organisation such as The Conservation Volunteers (TCV). This could also engage with larger organisations such as Heathrow Airport and associated contractors (through CVP) and be an inspiring model for enhanced land management and engagement in the area. TCV (and comparable organisations such as Thames 21, LWT and Green Corridor) has worked alongside CVP and FORCE over many years in delivering these types of improvement elsewhere in the Crane valley

2. **Improved Public Awareness of the Value of the Causeway Meadows Site and its context within the middle Crane valley.** A suite of options include: updated and improved site information boards; way marking that shows the linkages between this site and the sites downstream and upstream; a leaflet that would extend FORCE's existing hard copy and digital mapping northwards through the site area up to and beyond Cranford Park and downstream through Donkey Woods; walks and talks that encourage public use, awareness and appreciation of the area, considering the wildlife and historical value of the area and how these link with local communities. These are the types of activity FORCE has delivered with our partners elsewhere and seen them deliver major changes to the way open spaces are perceived and used by local communities.

3. **Linkages.** The road crossing of the A30 is currently a major blockage to the easy access along the river corridor and limits its use as a green transport route. Investigation of this linkage, including pelican crossing or pedestrian footbridge options, may be developed in association with other interested parties – including TfL, Heathrow Airport Ltd, LB Hounslow and LB Hillingdon for example - and through the CVP. The A312 road crossing

