

Fountains Close Development, Butts Farm, Feltham
Ref. P/2014/3836
Response from Friends of the River Crane Environment

Friends of the River Crane Environment (FORCE) is a locally based registered charity with over 500 members. The overall objective of FORCE is to improve the value of the River Crane corridor for wildlife and for local people. FORCE is responding to this planning application for Butts Farm estate at Fountains Close as the site lies near to the River Crane Corridor and the proposals include those for the adjacent open space.

FORCE would like to see any development of this site provide (a) improved public access to the Crane corridor and (b) improvements to the overall environmental quality of the river corridor. Our charitable Objects limit us to commenting on the impact of developments on public open space adjacent to the Crane corridor and we will not comment on the built development or its impact on residents.

1. In principle FORCE is supportive of the proposals to link the green spaces of Butts Farm estate with the neighbouring River Crane corridor through improvements to the local open spaces. This would be a valuable extension of a major project to improve Crane Park undertaken in 2011, funded by the GLA and undertaken by Hounslow and Richmond councils with our support. We were pleased that Richmond Housing Partnership included us in the consultation that was carried out primarily with residents, and very pleased that they appear to have listened to the comments made in this forum. This includes the comments that we made about making a clear link between Crane Park and the open spaces on the estate elements by including elements from Crane Park that can be identified - carved benches, the use of informal curved paths made of Bredon Gravel etc.
2. The grassed area currently at the centre of the estate has limited value in terms of biodiversity. Again we agree that there is merit in enhancing the environmental value of the open space on the estate and we would encourage the use of native species of trees, shrubs and plants that add to the environmental value of the river corridor for wildlife. The significant tree and hedge planting programme that is shown in the proposals drawings is to be welcomed. These will need regular maintenance, recognising that newly planted saplings everywhere are a target for vandalism.
3. The proposed scheme seems to acknowledge the need for a recreational focal point for residents living on the estate, as a large space for informal leisure to socialise and to play informal sports at the centre is proposed. However, as a member of the Butts Farm Working Together Group, we note that the design does not acknowledge the aspirations of this group for a community garden, and in many ways seems to be working at odds to the wishes of the group, even though RHP are members. In our view it would make sense to link this project with the Butts Farm Working Together project by including these aspirations into the larger development scheme for the estate. This would help to maximise resources including the energy of the residents and a feeling of ownership for the scheme from residents.
4. The successful long term sustainability of the proposals will require a commitment to regular management in order to adequately maintain the separate landscape elements and themes of the scheme. Planting plans, and especially wild flower meadows, will require regular management, and facilities such as play equipment will also require regular maintenance, replacement and management. In our view there needs to be an explicit and quantified financial commitment to the long term management of the scheme, as a part of this proposal, which would otherwise become unsightly or, in the case of play equipment, unsafe.
5. Whilst we consider that the proposed elements of the open space scheme might be welcomed by many residents, as they offer enhanced opportunities for play and leisure, and we welcome the proposals to improve the biodiversity of the estate, we remain concerned about the principle of building on land that is currently designated as Metropolitan Open Land.

6. The role that this open space plays within the estate and its importance as Metropolitan Open Land is reflected in Hounslow's UDP which states in ENV N1.5, in the section on Butts Farm, that *the "main features of this area is its contribution to the public open space for the residential area, its value for wildlife and nature conservation, recreational open space and its location as a gateway to the Crane."* The policy states that the Council will *"safeguard the permanence and integrity of the Metropolitan Open Land within the Borough, with special regard to conserving and enhancing its particular character, appearance, historic and cultural value and its ecological value, whilst increasing access to and enjoyment of these large open spaces"*.
7. POLICY ENV-N.1.6 Metropolitan Open Land: Acceptable uses states that planning permission will not be granted for any development within Metropolitan Open Land which is not compatible with its open character and the defined acceptable uses. It also states that *"Within the Metropolitan Open Land permission will not be granted, except in very special circumstances, for other than the following uses with ancillary buildings and structures, where necessary, provided that they do not detract from the open nature and special character of the area:*
 - (i) public and private open space and playing fields;*
 - (ii) agriculture, woodland and orchards;*
 - (iii) open air recreational facilities;*
 - (iv) nature conservation;*
 - (v) allotments and nursery gardens;*
 - (vi) cemeteries;*
 - (vii) rivers, canals, reservoirs, lakes, docks and other open water."*
8. The proposal for developing Fountains Close will significantly encroach upon the Butts Farm Metropolitan Open Land. None of the exceptions identified in borough policy can be said to have been fulfilled in the development of the proposed housing which will be built on this land. Furthermore the development of high rise buildings at the centre of the estate, and in a currently open space, will not enhance the appearance of the Metropolitan Open Land. They will be a visually dominant feature on the Metropolitan Open Land.
9. FORCE believes that the exceptional circumstances outlined in the borough planning document are not fulfilled and that the provision of environmental enhancements, additional play and leisure facilities does not warrant the proposed intrusion on the open space. We are concerned that, if this proposal were successful, it might create a precedent for other proposals to build on or adjacent to the open space in response to the local need for housing. [Our concerns relate both to the specific risks of further loss on this site and the generality of losses of publically accessible open space more widely in the Crane Valley.](#) As a result of this FORCE is objecting to the proposals as set out in this planning application.