

Friends of the River Crane Environment
c/o Habitats & Heritage
E.T.N.A. Community Centre,
13 Rosslyn Road,
Twickenham, TW1 2AR

Grace Edwards,
Planning Officer,
London Borough of Richmond upon Thames,
Civic Centre,
44 York Street,
Twickenham TW1 3BZ.

28 November 2022

Dear Ms Edwards,

**PLANNING APPLICATION NUMBER: 22/3004/FUL
KNELLER HALL ROYAL MILITARY SCHOOL OF MUSIC, KNELLER ROAD, TWICKENHAM TW2 7DU**

RESPONSE TO CONSULTATION BY FRIENDS OF THE RIVER CRANE ENVIRONMENT

This letter constitutes the response of the Friends of the River Crane Environment ("FORCE") to the neighbourhood notifications being undertaken by the London Borough of Richmond upon Thames ("LBRuT") with respect to the above application concerning the redevelopment of the Kneller Hall site.

FORCE OBJECTS to this application.

Our response comprises:

- Introduction to Friends of the River Crane Environment
- FORCE objections to the application:
 - Proposals in the Development Plan
 - Nature conservation
 - Other considerations
- FORCE aspirations for this site
- Conclusion.

Introduction to Friends of the River Crane Environment

Friends of the River Crane Environment (FORCE) was formed in 2003 with the Objects to protect and enhance the community and environmental value of the River Crane catchment. We are a community-based charity with over 750 members, the majority of whom are residents of the London Borough of Richmond upon Thames (LBRuT).

The Kneller Hall site is a large open space within the catchment, near to the Lower Duke of Northumberland's River (DNR) and with Whitton Brook formerly running through the grounds. For these reasons we have been engaged with the plans for the site for several years. We contributed to the development of LBRuT's Supplementary Planning Document (SPD) for the site, and responded to the earlier consultation in June 2022.

The site lies at the northern edge of LBRuT, on its boundary with the London Borough of Hounslow. In particular the 'ecology corridor' of natural vegetation lies along the northern boundary of the site at the very fringe of LBRuT. Its location gives the site particular significance in both environmental and community terms. This part of LBRuT does not have a decent, high quality public open space. The nearest such spaces are at Murray Park in LB Hounslow or, severed by the railway and the A316, Kneller Gardens which is already overloaded and suffering the consequences of successive housing developments in the lower Crane valley already approved by LBRuT.

Its boundary location means that any improvements to public access and ecology made in the ecology corridor will benefit LBH residents as well as LBRuT residents. We trust that the LBRuT Council will be nonetheless motivated to achieve access and ecology improvements, given its duty to cooperate with other London boroughs. The boundary location also means that if improvements to public access and ecology are not made on this site, then compensatory improvements will have to be made to open spaces elsewhere in LBRuT, where open-space provision is already better than it is here, thus exacerbating the Borough's inequalities.

FORCE objections to the current proposals

We have discussed our objections to the current proposals with the developer on two occasions. On page 25 of the "Design and Access Statement Landscape" ("DASL") the developer gives reasons why it is unable to meet or mitigate our objections. We are not persuaded by these reasons. Consequently, FORCE OBJECTS to this application. The 'material planning considerations' which form the basis of our objection include:

- Proposals in the Development Plan
- Nature conservation
- Other considerations.

Proposals in the Development Plan

What this part of the Borough does not have, and what it really needs, is a decent, high quality public open space such as the 'Kneller Park' which LBRuT included in its agreed SPD for the Kneller Hall site. The current proposal will not deliver such a space. Worse, if the current proposal is approved, LBRuT will be unable to deliver such a space in this part of the Borough for the foreseeable future.

The fact that this proposal is at such great variance from the Council's agreed SPD for this site is a key consideration for FORCE. The SPD anticipated the creation of a major new park and wildlife area with unfettered public access. The significant increase in public open space in this SPD was an integral balancing element against increases in residential housing, foreshadowed elsewhere in the Local Plan, at the RFU, Stoop and Gregg's sites and already being delivered on the College site. Failure to achieve this increase in public open space at the Kneller Hall site destroys the balance of the entire Local Plan. It increases the probability that completion of the residential housing developments in the Local Plan will overload the existing open spaces.

In the past, FORCE has objected to a succession of residential housing developments in the lower Crane valley on the grounds that their cumulative population will overload the adjacent public open spaces, which are already heavily used. Our objections have always been overruled on the grounds that each planning application has to be considered on its own merits. Planning applications can only legitimately be considered on their own merits in the overarching context of the Local Plan. The Council cannot unilaterally annul one element of the Local Plan – the provision of new public open space – without undermining the integrity and legitimacy of the remainder of the Local Plan, in particular the Local Plan's housing proposals.

Approval of this proposal would deprive the public of open space accessible by all on an unfettered basis. The application deliberately downplays the significance of this loss by:

- its misleading presentation of existing open space in this area
- its claim of widespread community support for the constrained public access which the proposal offers.

The developer gives away its agenda in rejecting FORCE's proposal to 'Create the wildlife area as a separate public access zone on the northern side of the site': one of the reasons it gives is "There are a number of other green spaces in the area that can be used by the general public" (DASL, p25). This follows from its map on page 8 of the DASL purporting to show that "The existing local population has access to a number of publicly accessible green spaces". However, at least two of the seven sites shown do not have public access except under very restrictive conditions similar to those which will prevail at the proposed school. Site 1 is only available to fully paid-up members of Whitton Park Sports Association, and even then, only for members of sports teams. There are signs banning dogs, so the site is clearly not intended for unfettered public access. Site 5 "Twickenham Playing Fields" appears to be the Cardinal Vaughan School playing fields, which are padlocked against public access. This leaves aside the question of whether Craneford Way Playing Fields and Kneller Gardens really are accessible from Kneller Hall within a 10-minute walk for a parent pushing a buggy; and whether such a parent is comfortable accessing Kneller Gardens via the subway under the A316.

The map on page 10 purports to show "Wider Green Space" but confounds what is and is not publicly accessible. The key defines the copious green-coloured areas as "Ecological Spaces, e.g. allotments, shrub lands, grass verges. *Includes amenity green space*" [my emphasis]. It includes all the routes of South Western Railways, although these are presumably not "amenity green space". Neither are the playing fields of Whitton Park Sports Association or Cardinal Vaughan School, which appear here again. Incidentally, FORCE claims no proprietorship over what is shown as "FORCE Green Link" and we do not recognise the route shown skirting the eastern side of Mogden Sewage Treatment Works.

The developer reports that "Over 50% of respondents Strongly support the proposed community access to Kneller Hall sports facilities" and that "invitations to outdoor events and concerts was most popular, with the swimming pool and tennis courts second and third respectively" (DASL, p23). The developer tacitly acknowledges that these responses were given in advance of any hard information, citing respondents who "can't wait to see the community use aspect." In reality, the school will anyway retain absolute control over the degree of public access allowed: "The school's maintenance team will ensure that the grass pitches are not overused..." (DASL, p59).

The consultation responses cited are by definition the responses of the engaged and active in the community. The voiceless and hard-to-access are unlikely to have given their views. And they are unlikely to afford the participation fees or join the sports clubs which will benefit from the constrained community access. Yet these are the very members of the community who would benefit most, in terms of physical and mental health, from unfettered public access to a high quality open space.

To this extent, the proposal represents a regressive step in terms of equalising access for Borough residents to physical and mental health benefits. In a part of the Borough already poorly served with public open spaces, the current proposal deprives local residents of free, unfettered access to this particular space. Despite the developer being "keen to build a good relationship with our neighbours," this proposal will lock the neighbours out, unless they are able to pay to attend musical events or belong to "local community groups and schools" who can buy access to the facilities. Just as Council approval of the fencing of the College Field in 2015 deprived those most in need of free and unfettered access to that space, so will Council approval of the current, regressive Kneller Hall scheme entrench health inequalities within the Borough.

If the Council were to approve this proposal, with its deprivation of unfettered public access, there are two possible, and not mutually exclusive, mitigations. First, the Council should redress the balance of its SPD by providing at least equivalent high quality, unfettered public access open space elsewhere in this part of the Borough – leaving the former Mereway Day Centre site undeveloped would be a token compensation, although much more would be required to offset the loss at the Kneller Hall site. Second, despite the refutations on p25 of the DASL, we continue to believe that public access to the northern ecology corridor could be provided without compromising safety or safeguarding. All schools have secure fencing, not least the nearby Chase Bridge and Nelson Primary Schools; and hedgerows could be planted for extra reinforcement.

Other refutations on p25 are equally invalid. “[T]he potential for anti-social behaviour, increased litter, hazardous material and fly tipping” is no greater here than at any other of the Borough’s open spaces. “Kneller Hall has always been a restricted site” precisely misses the point that the SPD proposed to open up some of the site as an entirely new space to the public with unrestricted access. “There are currently no formal links between Kneller Hall and the surrounding green spaces thus opening this up will create an arrival point rather than a walk through and could encourage lingering within the site boundary” reveals a very narrow and short-term focus. There are currently no formal links because, exactly as the developer stated previously, Kneller Hall has always been a restricted site. But it does not have to remain this way for perpetuity. The ecology corridor could be opened up at its western side either through the listed entrance off Whitton Dene or from a new entrance at the end of the listed wall at Amberside Close (“Site Analysis” plan, DASL, p14). Its eastern side could be linked with the adjacent, hitherto inaccessible wooded area and a pathway extended through to link with Spray Lane. Opening up these entrances would also ensure that the security fencing would not “impact upon the school’s use of this area for outside learning”. The area would be just around the corner from the school’s listed Whitton Dene entrance. Students at many of the Borough’s schools are obliged to travel much further than this to access outside learning.

Nature conservation

The developer commits that “The proposed landscape strategy is to enhance the ecology and biodiversity in the northern part of the site, including enhancing acid grassland in this area.” The developer then claims that “If unmanaged public access is provided to this area, it risks the proposed ecology enhancements not being secured or habitats being harmed” (DASL, p25). Yet the trade-off between public access and ecology is managed elsewhere in the Borough every day by many other agencies, including LBRuT, Royal Parks and London Wildlife Trust. If the ecology corridor were to be delivered as a publicly accessible site, it could benefit from all this expertise. And instead of excluding the neighbours, this could be a site of genuine community engagement, with public volunteering and ultimately its own Friends’ group to promote access and ecological improvements.

There is no reason why the public have to be excluded from the ecology corridor in order for forest schools to be held there (DASL, p26). Forest schools are held in other public spaces in the Borough, including Ham Lands and Crane Park.

Approval of the current proposal would leave the ecology corridor as very much a secondary interest to the core business of the site, that of the private school. The corridor would be much less likely to benefit from prioritisation of investment and expertise. It could even be a victim of wilful neglect, as depressed ecological value would strengthen the business case for extending the school into the area and increasing the school’s fee income. The current proposal offers no long-term protection from development.

If the Council approves this application, we would like a condition of approval to be prohibition of further construction or development within the ecology corridor.

The proposal includes building an astroturf hockey pitch on Metropolitan Open Land. The astroturf would replace semi-improved acid grassland. Location of the astroturf hockey pitch alongside the artificially surfaced tennis courts will interrupt the continuity of natural surface between the ecology corridor and the rest of the site. Damage to the ecology corridor will be compounded by the proposal to floodlight the tennis courts which sit at its edge. Floodlighting of the tennis courts also increases the probability that an application to floodlight the adjacent astroturf will follow very shortly, couched as being necessary to ensure viable use during the winter period. The proposal already offers “Managed community access to facilities...[on] summer evenings” (DASL, p45).

If the Council approves this application, we would like a condition of approval to be that no further extension of floodlighting from the tennis courts to the astroturf would be approved for perpetuity.

We have repeatedly suggested that the all-weather facilities should be located nearer to the south side of the development, where the break in natural surface, the noise and the floodlighting will be less disruptive to nature. We note that the natural sports pitches have been reduced in size (DASL, p31). We do not accept that the location of the sports pavilion should force the degradation of the ecology corridor throughout the entire year. The positions of the sports pavilion and the basketball courts could be flipped.

The sports pavilion does not have to be directly opposite the wickets. These measures would enable the cricket pitch to be moved further north, and the astroturf to the south.

Finally, it is not clear why the Maintenance Area and Energy Centre have to intrude so deeply into the ecology corridor (DASL, p44). It is difficult to understand why the Grounds Maintenance facilities are located so far away from the natural-surface pitches, and so near to the artificially-surfaced tennis courts and hockey pitch which by design should require much less maintenance than the natural-surface pitches.

Other considerations

We note that there is no proposal for rainwater harvesting and no proposed re-use of grey water on the site. While these factors are apparently not deemed to be 'material planning considerations', we believe that they represent a significant lost opportunity to improve the ecological footprint of the development.

With respect to Whitton Brook, the developer has concluded that "the Whitton Brook has been diverted and therefore there is no culvert remaining on the site to be opened up" (DASL, p25). This again reflects a very narrow and short-term focus. Restoration of the Brook, and ideally of the 19th Century lake in the ecology corridor, would have several advantages, both for the school, for the local environment and for the planet:

- it would provide a natural feature for recreational and educational purposes, for both students and the general public – water features have particular therapeutic value for those in poor mental health (e.g. "Why spending time near water gives us a powerful mental health boost," Catherine de Lange, *New Scientist*, 3395, 16 July 2022)
- it would promote biodiversity
- it would foster flood attenuation, by taking the stream out of its current diversionary channels and slowing its flow between naturalised banks or as a lake.

It would also provide assurance against future development of this part of the site.

If the Council approves this application, we would like the developer to contribute towards a professional survey to establish the actual course of Whitton Brook from its diversion, and its potential for restoration; and to condition the developer's future cooperation should it become feasible to de-culvert the Brook and re-establish the lake within the ecology corridor.

Finally, the "Design and Access Statement" Parts 8 and 9 (pp52-5 inclusive) for this application were not available on this website. These cover "External lighting, Historical links, Green Infrastructure Strategy and Site wide approach."

FORCE aspirations for this site

This site has been in Ministry of Defence ownership, with tightly controlled public access, for well over a century. Its sale therefore represents a once-in-a-century opportunity to create public open space and provide unfettered public access to a part of the site. If this opportunity is not seized now, then it will be much more difficult and costly to retrofit once the current proposals have been implemented.

Our usage surveys demonstrate the latent public demand for access to open space. Twickenham Junction Rough was in private, railway and Post Office ownership for well over a century before a part of the site was released to the public in 2018. From a zero base, some 800 people per day now access the site. Nearer to Kneller Hall, footfall has increased more than eightfold on the DNR footpath at Chase Bridge since improvements began in 2015.

In our view, any scheme for the Kneller Hall site needs to respect the provisions of the SPD, and provide considerable and guaranteed long-term community and environmental benefits for all residents of the local area, regardless of their income. We suggest the following as a possible means of achieving this:

- Create the ecology corridor as a separate public access zone on the northern side of the site, with a fence- or hedge-line to the remaining school site as a means of meeting safeguarding imperatives and controlling access from the school

- Use this opportunity to link this area into the wooded area to the east of the site
- Provide free and unfettered public access at the western and eastern ends of this area to provide a green walking route between Whitton Dene and Spray Lane, either through the listed entrance off Whitton Dene or from a new entrance at the end of the listed wall at Amberside Close
- Operate this space as a shared space for outdoor lessons and community use with associated school, community and council engagement and management
- Re-locate the floodlit tennis courts and astroturf hockey pitch to the southern end of the site to provide an uninterrupted extent of natural surface to the north and minimise noise and light intrusion into the natural corridor.

Conclusion

FORCE has a long history of working with the Council and developers to secure long-term community and environmental benefits which also help to meet development objectives. We would be very happy to meet with the Council and the developer to discuss our response further.

Yours sincerely,

Gary Backler,
Chair, Friends of the River Crane Environment