
CHAPTER 4**OPEN ENVIRONMENT****Policy/Para** **ENV 01**
Modification ref: **D/ENV01/03****Metropolitan Open Land****Issues**

- (i) The Policy should not allow the release of MOL for inappropriate development.
- (ii) MOL should not be lost; brownfield land should be used before the release of MOL.
- (iii) The Policy should provide for additional protection of MOL particularly regarding MOL in recreational use.

Inspector's appraisal and conclusions

The Policy should not allow the release of MOL for inappropriate development.

4.1. Both Strategic Planning Guidance for London (RPG3) and the Draft London Plan afford the same protection to MOL as land within the Green Belt where there is a presumption against inappropriate development. Policy ENV1 as modified by D/ENV01/03 reflects this guidance. However, PPG2 and RPG3 allow the review of MOL boundaries by Local Authorities in exceptional circumstances, notwithstanding their intended permanence. Nevertheless, if the release of land from MOL were justified it would not be reasonable to continue to subject this land to a similar level of protection as MOL as the land would no longer be serving the same purpose. To insert the clause suggested by the objector would therefore not be logical or reasonable.

MOL should not be lost; brownfield land should be used before the release of MOL.

4.2. I deal in other parts of my Report with the merits of the suitability for release of various sites currently listed as MOL. In broad terms there is nothing in Policy ENV1 that weakens the level of protection for MOL set out in RPG3. Given the permanent nature of MOL, PPG2 and RPG3 allow for the review of MOL boundaries by Local Authorities only in exceptional circumstances and I accept that the availability or otherwise of brownfield land may be a significant consideration in assessing the suitability of MOL land for release. I also recognise the importance that the utilisation of brownfield land is given in national and regional planning guidance. However, given the specific purposes that MOL serves, other issues may also nevertheless justify reviewing its designation and possible release. The proposed further modification of the Policy is therefore overly restrictive and inappropriate.

The Policy should provide for additional protection of MOL particularly regarding MOL in recreational use.

4.3. I consider that both Policy ENV 1 and other policies in the UDP provide sufficient protection for recreational facilities located in MOL in the Borough. Therefore specific amendment of the Policy to protect recreational facilities in MOL would be unnecessarily repetitive. It would also imply a grading of protection that is not in the regional and national policies.

RECOMMENDATION

4.4. I recommend that the UDP be modified by D/ENV01/03.

Modification ref: D/PMP/03**Russell School, Ham****Issues**

- (i) Removal of land from MOL would have a detrimental effect on the view of Ham House.
- (ii) Removal of land from MOL at Russell School is not justified.
- (iii) The removal of 12 sites from MOL is not justified.

Inspector's appraisal and conclusion

De-designation of land from MOL would have a detrimental effect on the view of Ham House.

4.5. Ham Amenities Group considers that the removal of two small areas of MOL at Russell School would have a detrimental effect on the view from the avenue that links the lodge adjoining the German School with Ham House. I observe that no development of the 2 small areas of land contiguous with the Russell School building would interfere with any vista towards Ham House. Indeed, the Proposals Map clearly protects the vista along the avenue. However, Ham House is not in that line of sight. The western part of the Russell School school site proposed to be deleted from MOL is the terminal point of a view line from Twickenham Riverside defined on the Proposals Map. I do not consider the school itself a significant component of that view. In summary I agree with the LPA that the removal of these two small parcels of land at Russell School would have no significant impact on views of Ham.

De-designation of MOL land at Russell School is not justified.

4.6. Objectors express concern about the loss of MOL at Russell School, which they consider has not been fully justified. The Council considers that the removal of these parcels of land would have minimal environmental impact. The LPA justifies the release of MOL to meet the educational needs of the Borough as set out in *Core Proof 3: Education*, which I principally deal with in connection with objections to Policy CCE2 and specific Local Proposals in Chapter 12 of the Plan, including Twickenham local sites in the Crane Valley under the additional Policy proposed in modification D/ENV/X. So far as concerns the 2 small parcels of land adjacent to the Russell school building I accept that their very modest significance as MOL is clearly outweighed by educational needs.

The removal of 12 sites from MOL is not justified.

4.7. Policy ENV 1 reflects the firm statement in both PPG2 and RPG3 that Green Belt boundaries and hence MOL boundaries should only be changed in exceptional circumstances. Objectors are concerned that these exceptional circumstances have not been set out by the Council in the UDP or any other document; open space is a valuable resource; and there is no need to release MOL land for housing or other purposes.

4.8. I consider that the LPA has expressed in clear broad terms in *Core Proof 3: Education* an overriding need for the removal of various areas of land from MOL in order to accommodate the expansion of educational facilities, in most cases for post-16 pupils. In my view this necessity for expansion can be considered an exceptional circumstance and accords with the observation of the Panel Report on the London Plan. While I consider that in the case of individual sites the justification for the removal of this designation needs to be balanced against any environmental impact it may cause, the general principle of removal of sites from MOL to accommodate necessary school expansion is acceptable. In coming to that view I have also borne in mind that MOL boundaries were tightly drawn around various school buildings on the 1996 UDP Proposals Map, seemingly without regard for any future educational need.

RECOMMENDATION

4.9. I recommend that the UDP be modified by D/PMP/03.

Modification ref: D/PMA/04

Teddington School

Inspector's note

I deal with this site as the site-specific Teddington Proposal D14 in Chapter 11 of this Report.

Modification ref: D/PMA/05

Grey Court School

Inspector's note

I deal with this site as the site-specific Ham and Petersham Proposal P5 in Chapter 11 of this Report.

Modification ref: D/PMA/06

Mereway Allotments

Inspector's note

I deal with this site as the site-specific Twickenham Proposal T34 in Chapter 11 of this Report.

Modification ref: D/PMA/07

Terrace Yard, Petersham Road, Richmond

Inspector's note

I deal with this site, the subject of Proposal T17 in the Local Areas – Richmond section of the UDP, in Chapter 11 of this Report.

Modification ref: D/PMA/08

Twickenham Rifle Club

Inspector's note

I deal with this site, the subject of Proposal T36 in the Local Areas – Twickenham section of the UDP, in Chapter 11 of this Report.

Modification ref: D/PMA/09

Harlequins

Inspector's note

I deal with this site, the subject of Proposal T36 in the Local Areas – Twickenham section of the UDP, in Chapter 11 of this Report

Modification ref: D/PMA/10

Craneford Dépôt, Twickenham

Inspector's note

I deal with this site as the site-specific Twickenham Proposal T18 in Chapter 11 of this Report.

Modification ref: D/P MAP/11 **Craneford Playing Fields,**
Twickenham
Further modification ref; D/P MAP/37

Inspector's note

In the Modifications agreed by the Council on 17 December 2002 the contiguous Craneford East and West Playing Fields were shown on separate maps which were both labelled D/P MAP/11. That proposed modification deleting their MOL designation was withdrawn in the further modification D/P MAP/37 in August 2003 which restored their MOL status. The objections are therefore met.

RECOMMENDATION

4.10. I recommend that the UDP be modified by D/P MAP/37.

Modification ref: D/P MAP/12 **Heathfield School,**
Whitton
Further modification ref: D/P MAP/21

Inspector's note

I deal with this site as the site-specific Whitton Proposal W15 in Chapter 11 of this Report.

Modification ref: D/P MAP/29 **Marsh Farm Allotments**

Inspector's note

As the removal of this site's MOL status by the Modification is withdrawn the objections are met.

Modification ref: D/P MAP20 **Gothic Site, Petersham Road**
D/P MAP/31
D/P MAP/32

Inspector's note

I deal with this site as the site-specific Richmond proposal R18 in Chapter 11 of this Report.

Policy/Para ENV 02 **Green Belt**
Modification ref: D/ENV02/03

Issue

The designation of Hampton Waterworks as a Major Developed Site will probably result in gross over-development to the detriment of the riverside and concomitant traffic congestion.

Inspector's appraisal and conclusion

4.12. The arguments advanced by various objectors against the definition of this site as a Major Developed Site were fully examined in the previous UDP Review but are rehearsed again. The designation was endorsed by the previous Inspector and comprises only the core operational area on the Lower Sunbury Road, the rest of the site being subject to Policy H1. As I am not aware of any more recent change of circumstances I concur with the modification.

RECOMMENDATION

4.13. I recommend that the UDP be modified by D/ENV02/03.

Policy/Para **ENV 02A**
Modification ref: **D/ENV02/03**

Issues

- (i) Designation of the Major Development Site belies the Green Belt designation and the whole waterworks site should be dealt with.
- (ii) Major development should be within the existing buildings.
- (iii) The site is not surplus to water industry requirements.
- (iv) The proposal pays insufficient regard to nature conservation.
- (v) The track alignment of the Hampton Waterworks narrow gauge railway should be safeguarded against development.

Inspector's appraisal and conclusions

Designation of the Major Development Site belies the Green Belt designation and the whole waterworks site should be dealt with.

4.14 Any extension of the footprint of the currently existing buildings or any building on the Green Belt itself would be precluded by the proposal and policies agreed at the previous inquiry. MDS status does not allocate a site but states the criteria with which development should comply. The proposed modification follows the previous Inspector's Report (para 5.93) in this respect and I find no justification for change.

Major development should be within the existing buildings.

4.15. I note that this matter, including the boundary of the MDS, was fully canvassed at the previous UDP Review Inquiry. I find no evidence of any more recent material change in circumstances to justify a further change in the UDP.

The site is not surplus to water industry requirements.

4.16. Paragraph C1 of PPG2 makes clear that there is no such requirement for the identification of an MDS. However, the status of the buildings in the H1 area was established in the previous inquiry and there is no evidence to support the objectors' contrary assertion.

The proposal pays insufficient regard to nature conservation.

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4.17. The site has been identified as having nature conservation significance. I consider regard for this consideration should be a requirement of the forthcoming development brief for the site.

The track alignment of the former Hampton Waterworks narrow gauge railway should be safeguarded against development.

4.18. The former 3.5 mile long narrow gauge coal-carrying railway ran through what are now Spelthorne District and the London Borough of Hounslow and terminated in Hampton Waterworks. In order to facilitate its reinstatement between Kempton and Hampton riverside as an educational and recreational feature the objectors advocate the safeguarding of the track bed. Their concern is that development in the H1 area could preclude that.

4.19. The LPA have never considered the railway before the inquiry but would broadly support any scheme brought forward. They raise no objection to the protection of the route but they point out, however, that the whole scheme would depend on the consent of two other planning authorities. I consider it appropriate to refer to the railway track in the policy and the reasoned justification.

RECOMMENDATIONS

4.20. I recommend that the UDP be modified by D/ENV02/03, further modified as follows:

(i) The addition of:

(d) It will not obstruct the reinstatement to working order of of the former light railway serving the works.

(ii) The addition at the end of the reasoned justification of:

In order to facilitate the possible reinstatement of the light railway from Hampton Water Works to Kempton it is necessary that the former track bed and loading gauge remain unobstructed.

Policy/Para	ENV 03	Other Open Land of Townscape
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Importance:

Modification ref: D/PMAP/13

Heathfield School, Whitton

Inspector's note

This site is the subject of Whitton and Heathfield Proposal W15 and I deal with it in Chapter 11 of this Report.

Modification ref:	D/PMAP/14	Collis School,
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Teddington

Inspector's note

This site is the subject of Teddington Proposal T10 and I deal with it in Chapter 11 of this Report.

Modification ref:	D/PMAP/22	Waldegrave School
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Inspector's note

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This site is the subject of Twickenham Proposal T9 and I deal with it in Chapter 11 of this Report.

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Policy/Para	ENV 11	Retention and improvement of Public Open Space
Modification ref:	D/PMP/20	Gothic Site, Petersham Road
	D/PMP/31	
	D/PMP/32	

Inspector's note

I deal with this site as the site-specific Richmond Proposal R18 in Chapter 11 of this Report.

Policy/Para	ENV 18	SSSIs and Other Sites of Nature
Conservation		
Modification ref:	D/PMP/30	Brunel University, Twickenham Site

Issue

Whether the definition of the site as an Other Site of Nature Importance should be restored.

Inspector's appraisal and conclusions

4.21. This objection site was transferred from the London Borough of Hounslow to the London Borough of Richmond upon Thames in 1994. Before that it was shown as 'other educational establishment' on the County of Middlesex Town Map. It was mistakenly designated an OSNI in the 1996 Richmond Proposals Map. In 1999 It was not identified as meriting designation as a site of nature conservation importance in a borough-wide survey made by the London Ecology Unit, the LPA's then customary professional reference body on such matters. No objection to the deletion of the OSNI identification from the UDP Review Proposals Map on nature conservation grounds was made by the Greater London Authority, the successor body to the LEU.

4.22. The site is being vacated by Brunel University which is concentrating its activities elsewhere. A planning brief for the development of the site for housing has been drawn up and an application for planning permission remains to be determined. No objection on the ground of nature conservation has been received from the GLA but English Nature has drawn attention to the need to protect the bat, bird, badger, and stag beetle populations of the site. Mr Edwards (obj 1465) sets much store on the historic function of the site as a Thames-side open space where there is a distinctive succession of large riverside open spaces of historic significance. However, the issue regarding an OSNI purely concerns ecology.

4.23. The site is in a conservation area; it is in a line of important views; part of it is within the Thames Policy Area; and important buildings and trees can be protected by UDP policies. In my view that formal array of controls, together with the fact that the appropriate reference bodies have been consulted by the LPA on the proposed modification, the planning brief, and the fact that the current planning application remains to be determined is sufficient to ensure the protection of the features of the site which are important to nature conservation. I therefore support the proposed modification.

RECOMMENDATION

4.24. I recommend that that the Brunel University site be not identified as an Other Site of Nature Importance, and the UDP be modified by D/PMP/30.

Policy/Para	ENV 31	Permanent Mooring of Houseboats and
Other Craft		
Modification ref:	D/ENV31/02	

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The modified Policy represents a major change in tone regarding residential moorings.

Inspector's appraisal and conclusion

4.25. The modification of the Policy concerning the status of houseboats has already been endorsed by the Inspector at the previous inquiry and is therefore not a matter for my report. The modification to the supporting text merely removes a duplicate sentence and should be made.

RECOMMENDATION

4.26. I recommend that the UDP be modified by D/ENV31/02.

Modification ref: X/ENV31/01**Issue**

Houseboats should be given equal wording status to pleasure craft in the UDP text.

Inspector's appraisal and conclusion

4.27. The modifications to the supporting text concerning the status of houseboats (X/ENV31/01) have already been endorsed by the Inspector at the previous Inquiry and are therefore not a matter for my report. The modification to the supporting text (D/ENV31/02) merely removes a duplicate sentence and should be made.

RECOMMENDATION

4.28. I recommend that the UDP be modified by D/ENV31/02.

Policy/Para	ENV 33	Protection of the Floodplain and Urban Washlands
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Modification ref: D/ENV33/02**Issue**

The Policy should contain more detail regarding the 1:1000 year floodplain.

Inspector's appraisal and conclusion

4.29 PPG 25 recognises that in the longer term there may be possible implications for locating development and infrastructure in the 1:1000 year floodplain but these can be identified by floodplain assessments. Whilst the supporting text does not set out in detail the implications of this floodline for the location of development and civil infrastructure, the text clearly refers to PPG 25 and the 1:1000 year floodline, as well as the use of SPG to give detailed guidance on floodplain assessments. To provide further information on this matter would involve the UDP in unnecessary detail and I find there that there is no necessity to provide further guidance in the text.

RECOMMENDATION

4.30. I recommend that the UDP be modified by D/ENV33/02.

Policy/Para	ENV 34
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Surface Water Run-off

Modification Ref: D/ENV34/02

Issue

The Policy wording should be more clear.

Inspector's appraisal and conclusion

4.31. In this instance I do not consider that the removal of the word sustainable from the text is justified. PPG 25 clearly refers to the use of sustainable urban drainage and the term has a particular meaning, referring to the use of methods similar to those listed in the paragraph. Therefore I consider that this modification should not be made and the original text reinstated.

RECOMMENDATION

4.32. I recommend that modification D/ENV34/02 be not made.

Modification Ref: D/ENV X

River Crane Area of Opportunity

Inspector's note

Following public consultation in January and February 2003 on the concentration of site-specific Proposals in the Crane Valley in the deposit version of the UDP Modifications agreed by the Council in December 2002 consultants were engaged to produce a Master Plan for the area as a whole. Its objective was to secure the best disposition of land uses, taking account of such area-wide issues as urban design, traffic, nature conservation, and flood risk.

This general Policy D/ENV X was agreed by the Council in March 2003 and was subsequently open to statutory consultation as a further modification of the UDP. The completed Master Plan, produced after further discussion with residents and various interested bodies, includes 4 options.

The Master Plan seeks to provide a comprehensive approach which achieves synergistically an overall degree of benefit to the area greater than that accruing from the individual Proposals in isolation. It aims to outweigh the loss of some MOL land with urban structural and ecological benefits in a better knit locality as a whole, citing the following advantages:

- a radically upgraded extension and realignment of the Crane Valley Walk
- ecological improvements to the Green Corridor along the valley
- re-naturalisation of the banks of the River Crane
- improvement of the path alongside the Duke of Northumberland's River
- creation of a quality setting for the Craneford Way playing fields
- the introduction of new urban squares and gardens and mitigation of the effect of the bulk of The Stoop (Harlequins) Rugby stadium
- redevelopment of the country's largest tertiary College to effect a wide range of public benefits
- redevelopment of the Royal Mail sorting office site with a form and use more compatible with and complementary to its location at the edge of the town centre and proximity to a public transport hub
- new housing to contribute to the demonstrated shortage in South East England including London
- the promotion of better quality of life through ecological, architectural, and urban design measures.

In response to the Council's expressed preferences the consultants produced 2 options in more detail.

Option 1 depends on the relocation of Richmond College to the Royal Mail sorting office site. Craneford Way Central Dépôt and a smaller Royal Mail facility would be relocated in new premises on the present College playing field adjoining the A316 Chertsey Road. Residential development would take place on the existing Central Dépôt and College sites.

Option 2 proposes the redevelopment of Richmond College on its playing fields adjoining the A316 with some reinstated open space and new residential development to the rear. The dépôt would remain with its area reduced by about a third which would be allocated for residential development.

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The Royal Mail site would be developed with a mixed-use scheme appropriate to its location in relation to the town centre and public transport hub.

In either option the application of resources derived from the disposal of land in Council ownership is fundamental to the feasibility of implementing the Master Plan. As the argument on that financial procedure is common to all the Proposals involving Council-owned land in the Crane Valley Master Plan area I deal with it here rather than in respect of each Proposal site separately in Chapter 11 of this Report.

Though I do not comment in this Report on representations supporting the Modifications to the UDP Review I make an exception in the case of Mr Malik (obj 3035.001) who owns a tract of former railway land bounded by the up Teddington loop railway line, the River Crane, Heatham Park, and Marsh Farm allotments. It is designated MOL and OSNI on the Proposals Map. As it would afford him access he supports the Policy. In his oral evidence he states that he intends to donate the land for a place of worship. I have not treated that intention as a formal objection to modify the UDP and it will be for the LPA to determine any application for planning permission for such development in the light of the relevant policies.

Issues

- (i) Financial rationale for the Master Plan.
- (ii) Loss of MOL.
- (iii) Loss of playing fields or open land in the absence of a needs assessment.
- (iv) The number of dwellings proposed.
- (v) The impact of traffic generated by the Master Plan proposals.
- (vi) Impact on nature conservation, the Green Chain, and the River Crane Walk.
- (vii) Flood risk.
- (viii) Alternative proposal by FORCE.
- (ix) Lack of reference to the Clifden site.

Inspector's appraisal and conclusions

Financial rationale for the Master Plan.

4.33. Numerous objectors refute the necessity to develop various Proposal sites to achieve improvements and enhancements, claiming it is not justified and that alternative sources of funding are available. The Council reports in its Open Space Strategy a backlog of infrastructural repair in public open spaces throughout the Borough to a value of £4.6 million, requiring an annual expenditure of £575,000. Having considered various courses of action the Council deemed the limited disposal of land, among other measures, to be justifiable by using the receipts to reduce the deficit in open space funding.

4.34. The Council's Open Space Strategy sees the treatment of Kneller Gardens with Crane Park as a key park with a playground, park keeper and improved pavilion and other improvements as a priority in the Twickenham area. In the Crane Valley Master Plan area the Proposals include

a radically upgraded extension and realignment of the Crane Valley Walk, including the securing of access over private land to bring the path closer to the river

ecological improvements to the Green Corridor

re-naturalisation of the river embankments

widening and improvement of the Duke of Northumberland River path

improvement to the Craneford Way playing fields and their setting.

4.35. I accept that the burden of FORCE's objection, that housing development is not necessary to enable the Master Plan's menu of improvements, is unrealistic in the light of the resources otherwise available, given the Council's previous efforts to raise external resources of the extent required. Nor does it seem to me likely that such funding would support the Borough's backlog of infrastructure repairs. In the context of my conclusions in Chapter 11 on individual sites I am inclined to the view that an appropriate and realistic solution can only rest on a more modest range of Master Plan proposals somewhere between the views of the Council and objectors on this issue. I consider continued consultation with and cooperation between the parties essential and would afford FORCE the opportunity to attempt to give effect to its confident views on the feasibility of obtaining external funds.

Loss of MOL.

4.36. Representations object to the loss of MOL on the grounds that it is contrary to planning policies through the hierarchy of levels from national to local; the designated sites have not changed their character; and that their loss would weaken the Green Chain in the West London area. Both Strategic Planning Guidance for London (RPG3) and of the Draft London Plan afford the same protection to MOL as land within the Green Belt where there is a presumption against inappropriate development. That is reflected in Policy ENV1 as modified by D/ENV01/03. However, PPG2, RPG3, and para 3D.48 of the Draft London Plan allow the review of MOL boundaries by Local Authorities in exceptional circumstances, notwithstanding their intended permanence, specifically as changes to the UDP.

4.37. The LPA's examination of the Proposal sites in the Crane Valley which are MOL and in respect of the Master Plan proposals was made with reference to the functions of MOL elucidated in Policy ENV1 and also to their current use and degree of public access. I agree with the LPA that certain of the sites, that I consider individually in Chapter 11, only fulfill MOL functions in a limited way at most. Of the Proposal sites those which in my view most clearly fulfill the MOL criteria in Policy ENV1 are the former Mereway allotments and Twickenham Rifle Club. As I explain in Chapter 11, the outstanding characteristic of both of these sites is their openness which I consider would be irrevocably lost to an unacceptable extent by the respective Proposals. I shall recommend modification of the text supporting Policy ENV/X accordingly.

Loss of playing fields or open land in the absence of a needs assessment.

4.38. General objection arises from the LPA's failure to carry out a formal needs assessment as required by PPG17. However, the Council's published Open Space Strategy states that 100% of the Twickenham area is within 3.2 km of a metropolitan or regional park; 61% within 1.2 km of a district open space; 94% within 400m of a local open space; 59% within 400m of an equipped playground; and 77% within 400m of an area of nature conservation interest. A deficiency in terms of district open space is proposed to be remedied by treating Kneller Gardens and the Crane Park as a key park.

4.39. The Open Space Strategy commits the Council to fully review playing field provision in the Borough as a step to devising its implementation. Under the Master Plan proposals the College playing field is principally used by students, together with a local rugby team and by Harlequins when their training pitch is being rested. I agree with its interpretation as an essentially private facility. To compensate for its loss the College proposes to upgrade its field at Craneford Way East and also extend its use of facilities elsewhere. Mereway allotments have only ever been used as allotments, and then not since their closure in 1990, and Twickenham Rifle Club is effectively private open space accessible only to members.

4.40. On the assumption that a formal needs assessment would require significant resources and take

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about 6 months the Council carried out an analysis of playing field use that showed that

there is significant playing field capacity in the area overall

council-managed pitches have varying degrees of unused capacity, notably for association football on weekdays and Saturdays and for Rugby football on Sundays

on Sunday mornings there is only 14% unused capacity for association football but 56% for rugby football.

the unused capacity of private facilities is unknown

there is potential for formal pitches at Craneford Way West playing field which could accommodate a rugby pitch.

4.41. I accept that the level of playing field analysis was adequate for its purpose and with the loss to the College of its pitch adjoining the A316 and its replacement by facilities elsewhere there would be no shortfall either of public provision or of provision for the College.

4.42. FORCE draws attention to the identification of St Margarets and North Twickenham Wards as areas of environmental deprivation. While that is so, the GLA's London Index of Deprivation, from which the information originates, relies on air quality data, traffic accident data, and the 1993 derelict land survey data. As there is no reference to recreational green space I do not attach significance to these designations in that respect.

The number of dwellings proposed.

4.43. Contrary to estimates made by FORCE the number of dwellings proposed in the 2 preferred indicative Master Plan layouts and of which I take account is

Mereway	24
Twickenham Rifle Club	47
Council Depôt	142 (Option 1) or 60 (Option 2).

For the reasons I adduce in relation to the individual sites elsewhere in this Report I support only the 60 dwellings allocation to the Depôt in Option 2 plus whatever number of new dwellings would accrue from redevelopment of any of the existing Richmond upon Thames College site.

The impact of traffic generated by the Master Plan proposals.

4.44. Since I recommend that no residential development take place on the the former Mereway allotments there would be no additional traffic joining the road network at Mereway Road. So far as concerns peak hour movements generated by new housing at the Central Depôt and College sites the Council's traffic consultants assert that this would be assimilable either on the existing road network and thence to Whitton Road or by a new road having a junction with the A316 Chertsey Road. Although local residents express apprehension about these possibilities no technical evidence was adduced to demonstrate their unacceptability. On the other hand the feasibility of a new junction on the A316, a major London radial route, would be subject to consideration by the appropriate metropolitan authority, Transport for London, in the event of planning applications coming forward. As no objection was raised by TfL in the inquiry I support the residential proposals of the Master Plan net of my recommended excisions.

Impact on nature conservation, the Green Chain, and the River Crane Walk.

4.45. None of the individual Proposal sites were identified by the London Ecology Unit nature conservation survey in 2000 as of sufficient value to justify designation as OSNIs. The River Crane

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Corridor is designated as a Metropolitan Site of Nature Importance only as far downstream as the divergence of the Duke of Northumberland River, which is itself a Site of Borough Importance. Below that divergence the River Crane runs in a canalised concrete channel generally inhibitive of marginal vegetation. The Master Plan proposals include the widening of part of the Duke of Northumberland River corridor and the naturalising of the River Crane banks to enable extension of the River Crane Site of Metropolitan Importance. Housing on Mereway would have green roofs of natural material and the woodland and riparian vegetation would be enhanced. At the Rifle Club a riverside strip of appropriate planting would be left open together with naturalising of the opposite river bank.

4.46. The River Crane Walk was developed jointly by the London Boroughs of Richmond and Hounslow as part of the London Waterways Walk. In the Area of Opportunity it follows roads rather than the river. The Master Plan would realign it to follow the river as closely as possible and improve the waterside path along the Duke of Northumberland River which, as I observed, is of poor quality.

4.47. By contrast, FORCE claims that the Master Plan would result in urbanisation of the River Crane Walk. However, in the eastern part of the Master Plan area the Walk would be resited away from existing urban streets. In the light of the housing proposals for the former Mereway allotments and the Rifle Club site on the other hand I am inclined to agree with FORCE's interpretation, notwithstanding the suggested notion of building houses with roofs of natural green material at Mereway. However, I consider the degree of obstruction to the openness of those sites is the overriding criterion which should determine their future.

4.48. With regard to nature conservation it appears to me that in recognition of the value of objectors' oral evidence on this subject there would be considerable merit in the LPA harnessing that expertise in devising, as agreed in the inquiry, schemes for the enhancement of the nature conservation interest in sites in the Green corridor. As that is an operational matter, however, I do not propose to make any formal recommendation on the subject.

Flood risk.

4.49. Plans prepared by the Environment Agency show that of the areas proposed for residential development in Options 1 and 2 of the Crane Valley Master Plan parts of the the former Mereway allotments and Twickenham Rifle Club sites would be inside the 100 year return flood zone. A re-assessment produced by consultants for the Council immediately before the inquiry calculated the areas liable to such flooding at those sites to be of lesser extent than those shown on the EA's plan. Discussion on this matter was still in train between the EA and the consultants at the end of the inquiry. However, since I recommend that neither site be developed I consider this issue does not arise in respect of them.

The alternative Option 5 proposed by FORCE.

4.50. The components of the alternative option proposed by FORCE comprise

The former Mereway allotments as a nature park

Craneford Playing Fields West as a community park

The retention and enhancement, with more public access, of Twickenham Rifle Club and Marsh Farm allotments

The enhancement of links through the area

The exploration of opportunities to re-naturalise the River Crane.

4.51. For reasons expressed elsewhere in this Report I support FORCE's advocacy of the retention as MOL of the former Mereway allotments and Twickenham Rifle Club site, though in the interest of security I have reservations about encouraging more public access to the latter. I also consider a similar though less serious security consideration attaches to Marsh Farm allotments which would be retained in their present use. The crucial issue, however, is whether even the more limited aspirations of

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FORCE, which exclude housing development, could be supported by the Council's resource base. While I unreservedly support the maintenance of the Council's linkage with FORCE in deriving a viable scheme for the area I share the LPA's apprehensions regarding the provenance of adequate resources. There may be need for long and difficult negotiation in deciding the relative importance and feasibility of the components of an ultimately less ambitious scheme than the Master Plan. However, I do not think that should affect the high-minded but non site-specific aspirations of the proposed Policy, which I support.

Lack of reference to the Clifden site.

4.52. Richmond Adult and Community College is no longer included in the 2 Options, the College having withdrawn its own representations. In addition, references to a proposal for a school site in the Crane Valley have been deleted from the UDP. I therefore recommend the deletion of reference to a new secondary school in the text supporting Policy ENV/X.

Summary.

4.53. The diverse land uses in the tract of the Crane Valley from the bifurcation of the waterway where the Duke of Northumberland River diverges to the Royal Mail site have only their valley location in common and do not form a coherent valley environment. An objector rightly compares it unfavourably with the strong genius loci of the Thames-side Arcadian environment, asserting that that should be the standard for which to aim. I consider that in principle the policy of so developing this area as to knit its various elements in a consistently pleasurable locale merits support. However, because both Options 1 and 2 would include development of Mereway and the Twickenham Rifle Club sites I consider they are flawed since to develop those sites would be contrary to the wholly worthwhile objective of creating a coherent chain of open green land along the valley. I shall recommend modification of the proposed justification for the Policy accordingly.

RECOMMENDATIONS

4.54. I recommend that the UDP be modified by D/ENV X, subject to the following modifications of the proposed justification:

- (i) The deletion of the last 2 sentences of the first paragraph.**
 - (ii) The deletion of reference to 'the Rifle Club site' in the second paragraph.**
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