

## **FOWWS RESPONSE TO OPDC RE MASTERPLAN**

### **Planning Application 24/0036/FULOPDC**

This is the formal response from the Friends of Wormwood Scrubs (FOWWS) to the Planning Application from Wormwood Scrubs Charitable Trust (WSCT) by consultants LUC as being for Alternative Ecological Mitigation, but will be referred to as the Masterplan.

We regret that we are writing with objections and opposition to a disappointingly large proportion of its proposals.

FOWWS is a charity representing about 500 regular users and supporters of the area owned and managed by WSCT. Our purpose is the protection and promotion of the Scrubs, and our role is recognised by WSCT both by regular discussions and consultations, and by the co-option of 2 nominees of FOWWS to the WSCT sub-committee of the London Borough of Hammersmith & Fulham (LBHF) tasked by LBHF, as sole Trustee of WSCT, to manage the Scrubs.

The primary purpose of the Masterplan, funded by HS2, is supposed to be the ecological enhancement of the Scrubs, which FOWWS fully supports; unfortunately, the proposed works in the area covered by the planning application footprint will in reality cause the opposite effect.

**The guiding principles of the Masterplan and this application are to retain the wilderness and openness aspects of the Scrubs, and to introduce greater biodiversity, but in reality the proposals contain significant interventions that are the opposite of this principle**, with the introduction of features that will require major and permanent management and maintenance.

FOWWS strongly support the guiding principles, and acknowledge their involvement in consultations over an extended period, but regret certain aspects of the application. We also disagree with some aspects of the Masterplan which are not part of the application, and are writing separately to WSCT to express and explain our reasons for those disagreements.

**OPDC have long recognised the special nature of the Scrubs by their formal adoption of the description 'more wild than tamed' for the Scrubs, but the proposals in the planning application are all designed to reduce the wildness and enhance the tameness.**

The application disregards points made previously by FOWWS and others, in particular the location of the proposed pond, the locations of some of the swales, and the very large increase in hard paths.

In addition, and contrary to the impression given in the submission, there has **been a total lack of consultation** on this plan, which is different from those previously consulted on.

We are concerned at the significant increase in maintenance costs that the proposed works, especially the pond, will require, and question whether there will be sufficient finance available in both the short and long term.

## **The Pond**

The proposed pond location is at one of the higher points of the Scrubs – not one of the lower, which is misleadingly implied in the application - which is also in one of the most biodiverse habitat zones of the Scrubs. The proposed location is inappropriate.

We note from the contractors' documentation in the application that the pond, and perhaps the swales, will require dredging every three years, which will be a major intrusion and highly negative to any biodiversity achieved. This is a further reason for moving its location, if it is retained at all, to one of our suggested positions in either the south west or south east corners of the planning application area north of the prison.

There appears to be no recognition or understanding of the existing biodiverse richness of this part of the Scrubs, with its manifold grasses, lizards, butterflies and other wildlife. Lizards, like all native reptiles, are protected species, and that we understand that their principal breeding ground may be in the area of the gaelic football pitches, where major path and pond work is applied for. If consent is granted for the plans, as proposed, it may be necessary to organise their total relocation, which might take a whole breeding season, before any work should be allowed to start, further delaying the Masterplan implementation

As outlined in the application, this will require a borehole, of unstated depth, and no mention of the necessary power and equipment to operate it. It is stated, with no supporting information, that the ecological impact will be negligible, but to us it appears invasive and intrusive. In the hotter drier climate we are warned to expect, and on a site which is naturally dry (the Scrubs always develops significant cracks in dry summers), there are no convincing or supporting arguments to justify the statement that the impact will be minimal. Unnecessary works in a location that currently manifests a huge level of biodiversity are bound to have a negative impact.

We fully recognise the desirability of wetland features, and support those within Martin Bell's wood to the south east of the planning application area. (We also support those in the north-west corner of the Scrubs, outside the application area)

We believe that the proposed pond, should it be retained at all, should be located in the planning application area in either the south west or south east corners as these have naturally higher water provision, will cause less disturbance during construction and subsequent three-yearly dredging.

We note that all the illustrations misleadingly fail to show the need for the pond to have a surrounding fence, which is included in the proposed site plan. We expect that a fence will be essential to protect the pond from dogs, and to protect children from the risks associated with this pond.

There is substantial evidence (please see Appendix A) that allowing dogs to use ponds in urban areas destroys banking (and then requires concrete entrance points) reduces the biodiversity, damages water edge plants, and deters birds, and poisons the water as a result of pesticide residues.

We note the proposed depth of the pond at about 60-85cm which is quite shallow for a pond to achieve worthwhile biodiversity, although it will require excavation to about 1.5 to 2m to form the base. We do question the validity of the pond but if it is to be retained, strongly suggest one of the other less intrusive locations already identified above.

### **Hard Standing adjacent to the Pond**

We do not think it appropriate to have a substantial area of hard standing adjacent to the pond, as this will be an invitation to antisocial behaviour within earshot of the hospital and the prison. (The propensity to antisocial behaviour was evidenced by the provision of two picnic tables at the terminus of the hard paths onto the Scrubs at the northern end of Braybrook Street, which had to be removed within weeks of their erection, due to their immediate use for mini-raves and drinking events).

Any hard standing should be very minor, and any benches or picnic tables restricted to a minimum. This will still risk antisocial behaviour, to the detriment of all other users. Any hard standing will become a focus for requests for lighting in that area, something to which all voices have been opposed, for many reasons including its negative impact on biodiversity and wildlife.

We question whether the Hospital, the Police or the Prison authorities have been consulted.

### **Paths**

The proposed placement of the pond is driving the placement of paths, and we wish to state our view that there are more proposed than are necessary, and these, identified below, should be eliminated.

The Northern most path is useful to connect the Linford Christie Stadium (LCS) and parking area to the Braybrook Street playground area in terms of benefits for child-buggies and wheelchairs. BUT, it will also attract bicycles, e-cycles and e-scooter traffic, including delivery riders and illicit drug activity.

Cycling is not now permitted on the Scrubs, per bye-laws, and this path will make that impossible to enforce. The Law Enforcement Team are currently unable to control the professional dog walkers who disregard the dog management requirements in the PSPO, and this path will invite totally unenforceable disregard of the rules against bicycles etc.

The eastern-most path is already a grass path along meadow grasses and there is a parallel existing hard (tarmac) route, relatively close, slightly further east. The

southern path also runs parallel, and relatively close to, an existing hard (tarmac) path, and neither of these are necessary.

Appendix B sets out studies showing why broad paths such as those proposed create population fragmentation for ground-dwelling insects and other small animals, of which lizards are of particular concern on the Scrubs. Many walking/crawling insects avoid crossing the exposed path surfaces as the microclimate is not suitable. Putting broad paths across what is currently a broadly contiguous and biodiverse meadow-ish area threatens to fragment populations and potentially reduce genetic diversity of some species.

## **Swales**

FOWWS welcome the principle of swales for biodiversity and water management.

They do bring with them an added problem of litter, and the trial swales already show this, with bicycles and other detritus dumped in them. The proposal to plant attractive wild flowers, while on the face of it desirable, also detracts from their healthy aspect of encouraging children to run up and down slopes, an opportunity that is in very short supply in the Scrubs and in other LBHF open spaces.

Those outside the entrance to LCS– previously agreed to require the provision of sensible pedestrian access from the stadium to the playing field area – now comprise an excessive number of poorly-placed swales.

There is a need to ensure a proper pedestrian access between LCS, which is used for the storage of sports equipment, water and changing room facilities, and the sports field area.

This area is heavily used by hundreds of players and supporters for football, baseball, lacrosse, gaelic football, and running events and tournaments throughout the year. As currently proposed, access to the sports field will be severely restricted not only by the swales but also by the proposed further tree planting in that area, and will significantly hinder the movement of people.

We question whether the principal sports users have been consulted, including gaelic football club, Kensington Dragons, London Sports and others.

## **Summary**

**FOWWS are disappointed to have to write so negatively about this application, and in formal objection to many of its proposals – the location of the pond, the need for a borehole, the excessive number of paths, the provision of a large hard standing area, and the location of some swales, as we so strongly favour biodiversity and the improvements that this might bring to the Scrubs to the benefit of current and future users.**

Finally, we regret that there is no postal address, as opposed to digital, which might enable any of those older users and potential users to comment who may not be digitally comfortable.

Your sincerely,

Sir Stephen Waley-Cohen

Chairman, Friends of Wormwood Scrubs

Prepared by the Trustees of FOWWS with added support from FOWWS planning adviser Henry Peterson, and FOWWS honorary ecologist, Dr T. Collins.

## **Appendix A**

### **Pond parasiticide contamination – dog swimming**

from a manuscript in preparation:

#### **Dog swimming and ectoparasiticide water contamination in urban conservation**

**areas:**

**a case study on Hampstead Heath, London.**

**Lauren Yoder<sup>a</sup>, Melanie Egli<sup>b</sup>, Alexandra K. Richardson<sup>b</sup>, Adrian Brooker, Rosemary<sup>d</sup>**

**Perkins, C.M. Tilly Collins<sup>c</sup>, Leon P. Barron<sup>b</sup> and Jeff Waage<sup>d</sup>**

We found levels of imidacloprid (common dog parasiticide treatment and highly toxic insecticide) in the Hampstead heath dog swimming ponds that were over 100 times the average annual environmental quality standard

Also see

- Duncalf-Youngson, H. et al., Pet treatments could be harming freshwater life, Freshwater Biological Association, (2024).

[Pet treatments could be harming freshwater life — Freshwater Biological Association \(fba.org.uk\)](https://www.fba.org.uk)

- Egli, M. et al., A One-Health environmental risk assessment of contaminants of emerging concern in London's waterways throughout the SARS-CoV-2 pandemic, Environment International, 180 (2023). <https://doi.org/10.1016/j.envint.2023.108210>
- <https://www.imperial.ac.uk/grantham/publications/all-publications/are-urban-areas-hotspots-for-pollution-from-pet-parasitocides.php>

## **Appendix B**

This paper is about roads – but mentions paths in several places, and is also applicable to paths: <https://link.springer.com/article/10.1007/s10531-014-0831-2>

<https://www.natcapresearch.com/resources/what-is-the-fragmentation-of-ecosystems>