

THE FRIENDS OF THE SCRUBS
Registered Number 1187120

TRUSTEES' ANNUAL REPORT
15 April 2020

Abbreviations used in this Report

"The Friends"	the Friends of the Scrubs
"LCS"	Linford Christie Stadium
"LBHF"	London Borough of Hammersmith and Fulham, also "the Council"
"OPDC"	Old Oak and Park Royal Development Corporation
"QPR"	Queens Park Rangers Football Club
"WSCT"	Wormwood Scrubs Charitable Trust

President

Stewart Dalby

The Trustees

Elected AGM 9 April 2019

Stephen Waley-Cohen , Chairman (SW-C)

Tony Curzon Price, Treasurer *

Carmel McLoughlin Secretary

Miriam Shea (MS)

Nina Hall

Smita Davé *

David Jeffreys

Co-opted 11 October 2019

Sarah Johnson

Eleanor Botwright

*On 21 January 2020 Smita Davé was appointed Treasurer to replace Tony Curzon Price

Introduction

Our original constitution was adopted in 2005. We were recognised as a charity but we could not register with the Charity Commission because our income was well below their threshold. A few years ago a new structure, the Charitable Incorporated Organisation ("CIO"), was created. We could register as a CIO without any income requirement. With the increase in threats to the Scrubs, not least from the Linford Christie Stadium proposals, we felt our status in meeting these threats would be enhanced if we were a registered charity, and it should make it easier for us to raise funds, should these be needed for professional fees in fighting our case. The

Committee concluded it was in the best interests of our association to become a CIO. The Committee consulted with the Friends in November 2019 on the Name and the Objects to be submitted to the Charity Commission. The response was widely supportive in our pursuing this course of action. Our association was registered as a CIO with the name "The Friends of the Scrubs" on the 23rd December 2019 with registered number 1187120. Our constitution as approved by the trustees and the Charity Commission is on our website.

Objectives and Activities

The objects of the CIO (Friends of the Scrubs) are

(a) To promote for the benefit of the public the conservation, protection and improvement of:

(i) the open space known as Wormwood Scrubs ("the Scrubs") for exercise, recreation and leisure in particular but not exclusively in accordance with the Wormwood Scrubs Act 1879 and other statutes and lawful instruments that apply to the management and use of the Scrubs

(ii) the physical and natural environment of the Scrubs and its biological diversity

(b) to advance the education of the public in the history and natural history of the Scrubs

Meetings

The Trustees (formerly the Committee) have met several times during the year to deal with a variety of issues, mostly summarised in this Report.

WSCT Committee

One or both of our representatives (MS and S W-C) have attended all meetings. Kensington Aldridge Academy left the parade ground on the Scrubs in September 2018 but the temporary school buildings remain in place and their lease has extended for a further year until July 2020, to the benefit of the Trust. The rent from the Academy has provided a considerable boost to the Trust's finances. The unaudited 2018/19 accounts state that the Trust's closing unrestricted funds total £742,189. Historically WSCT has operated with an annual deficit, given normal operations. At the next WSCT meeting a decision will be considered if a further lease extension to KAA will be granted from July 2020 to July 2021.

Quadron/Idverde maintenance contract

Grounds Maintenance (GM) is undertaken by Idverde under a LBHF borough wide contract for all its green spaces which was originally let in 2008. The GM Contract expires in April 2021. LBHF have started the procurement process to agree a new GM contract. The first stage was to approach the market to explore what options are available.

The current proposal being drafted to LBHF cabinet is to:

- Extend the existing contract until 1st February 2022 in order to design a new specification and carry out the procurement process.
- Obtain a price and specification for Wormwood Scrubs that can be part of, or separate from the overall contract, depending on the advantages offered by the Contractor in terms of economies of scale.
- The AEM Works being undertaken with HS2 funding will be developing a Biodiversity management plan for the Scrubs which will form part of the specification. This is different from traditional grounds maintenance, but many contractors offer an appropriate countryside type service (see below HS2 Funding).

LCS and QPR

At the time of our meeting last year LBHF supported by WSCT had recently published its report on options for the stadium, overview and Consultation survey. The survey closed on 12 June 2019. We remind everyone that the options (shortened) were

1. Do nothing
2. Improve current facilities through partnership with a sponsor directly by the Council or by a community-led redevelopment
3. Major re-development involving a performance venue or stadium of up to 45,000 seats accommodating sports and entertainment while retaining an athletics track and other facilities

Option 2 would raise additional revenue for necessary work and future management and maintenance. Option 3 might well be the most financially attractive to LBHF but it is hoped, in the light of the assurances given to us in March 2018, the financial attraction is not their only consideration. Naturally QPR favoured Option 3 and lobbied their fanbase to support that option. However they seem to want the freehold of the site, something LBHF is most unlikely to agree, for both commercial and legal reasons. The Friends encouraged members and users of the Scrubs to respond to the survey and distributed leaflets locally and launched a social and other media campaign pointing out the huge disadvantages to local residents and users of the Scrubs of Option 3 and the advantages of Option 2.

The results of the Survey were published in June 2019 and were heavily in favour of Option 3. We have sought further information on analysis of the responses to the Survey. This has not been forthcoming.

This survey is not the end of the consultation process. There is further consultation being undertaken on Options 2 and 3 currently by consultants engaged by LBHF called In Partnership With Ltd who are looking at the specific development proposals. The Friends have encouraged [these consultants] to engage fully with all stakeholders of the LCSs and Scrubs including Hammersmith Hospital, Imperial College and all the current users of the Sports facilities at the Scrubs including LCS.

Once the findings are analysed, as mentioned in last year's report, approval of any proposal will have to be obtained from the WSCT and very likely the Charity Commission and Mayor of London (and the Ministry of Defence who still have a say in any alterations to the Scrubs under the Wormwood Scrubs Act).

If something along the lines of Option 3 finds favour with LBHF, again as reported last year we foresee substantial problems for them in overcoming the planning constraints of Metropolitan Open Land ("MOL") and restrictions on the use of the Scrubs under the Wormwood Scrubs Act and other legislation. We shall if necessary obtain proper professional advice, with a view to a political, legal, and public relations campaign against it.

As reported to the AGM last year, Kensington Dragons have produced an excellent short-term proposal for the regeneration of the existing sports pitches within LCS, which they are discussing with the Council but slow progress is being made.

HS2 Act 2017

Ecological Enhancement of the Scrubs and Scrubs

An Agreement between HS2 and LBHF dated 20th October 2016 secured £3.9m for alternative ecological mitigation (AEM) works for the Scrubs. Currently a consultation is underway by Land Use Consultants on a Masterplan for Biodiversity and Environmental Matters on the Scrubs, funded by HS2 monies. The interim Parks Manager for LBHF (previously the Scrubs Development Manager) Richard Gill, has been co-ordinating plans with a number of specialist consultants. He reports to the WSCT committee. The Friends have responded to the Consultation as a body, but also individual members and supporters have been encouraged to respond to the Consultation. Our response is:

1. Overall we are concerned that there appears to be an element of 'there's money available, let's spend it'; the most important single factor for the Scrubs is sufficient financial and

human resources for maintenance; the suggestion that a sum might be set aside for ten years' maintenance of the proposed improvements is not at all enough. Much of the present Scrubs, if more properly maintained, would achieve much greater ecological benefit and enable many species to prosper. Proper control of brambles, proper management of the 'wilderness' area, proper management and maintenance of paths – thereby encouraging people to avoid walking elsewhere other than on open land; all these would have much greater benefit than most of the proposed 'improvements'.

2. **The official designation of Wormwood Scrubs is that it is 'more wild than tamed'. This should be the unchangeable basis for all proposals, and many of those in this masterplan absolutely do not meet this test.**
3. We are also concerned that the expansion of formal sports pitches on the open space in the eastern part of the Scrubs will restrict the spring and summer use by very large numbers supporting London Sports weekend baseball activities. It will also potentially eliminate the possible use for commercially attractive open space short-term events, required to enable the charity's finances to remain stable and sustainable. Some expenditure on drainage of this entire area might be beneficial in improving the sports pitches. Proper management of the users of sports pitches is also required (an on-going cost, not an up-front one-off) to prevent the users, whether authorised or unauthorised, from leaving behind quantities of plastic bottles and other litter.
4. Planting of trees both to the left and right of the central copse will block views from the NW corner of scrubs at the confluence of paths from where you can see views out to East London, including the London Eye and the Shard. Will most likely block the sunset views that currently people can enjoy from the eastern boundary. In general we do not favour planting of trees on any currently open areas. It is well recognised that open grassland areas provide better carbon absorption than trees.
5. We do not favour the pond. It represents an unacceptable 'parkification' of the Scrubs and the bridge is wholly inappropriate to a 'more wild than tamed' area. The pond will attract rubbish and debris, and therefore rats. It will also represent a potential hazard for children, accompanied or unaccompanied. We oppose the pond.
6. The avenue of trees - the view from SE entrance into the Scrubs would be significantly adversely affected once the trees have grown. The open skies are to be enjoyed, and, again, the focus should be on 'more wild than tamed'. We also worry about the potential muddying of the track between such trees, or the use of some hard surface again greatly detracting. This carving up of the Scrubs is not a good idea.
7. Signage should be simpler and maybe more discreet. It should be about the provision of information. The proposed totem poles are a wholly inappropriate Disneyfication of the Scrubs.

8. Currently the model aircraft people use the area to the north of the central copse for 'runaway' and are permitted to fly their aircraft over the 'wilderness' scrub to its west. We are not sure if the proposals will carve out another space for them, but strongly feel that the present provision is sufficient and appropriate.
9. The proposed creation of more wetland in the south east copse (known as Martin Bell's Wood) is not supported. We recognise that parts of this copse is wet, but much of it is hard surface, and following the recent clearing of undergrowth is an attractive amenity which should not be 'wettered' and therefore removed from walkability.
10. Paths - whilst they do need to be better maintained, the proposed paths will be much too prominent in the self-binding gravel or 'hoggin'. There are other materials which can help maintain the grassy path, such as the generous use of wood chippings ahead of anticipated wet seasons.
11. As for **Proposals 23. Possible bridge link** we would observe that this has been the subject of much debate in consultations on the OPDC's Draft Local Plan, yet to be adopted, and as we see it any link would have to be part of that Plan. Whether any link north of the Scrubs will now be needed depends largely on the outcome of further proposals by the OPDC, in the light of the loss of the Car Giant site for development.
12. Apart from the mention of a secure location for ground nesting birds (see below) there is limited reference in the Masterplan to the protection of the rich variety of birdlife supported by the Scrubs. While appreciating the need for proper control of bramble over much of the Scrubs (see 1. above), it provides valuable cover for birds and any reduction should be undertaken with care to take this into account. Blackthorn and hawthorn are also important as a source of food and we would similarly seek sympathetic management of these shrubs. The embankment and Chat's Paddock are valuable breeding sites for several species (and the central grassland is for meadow pipits, see below), the embankment particularly so for warblers which have had a good success rate in recent years; it would be tragic to see this reduced by human intervention

The central grassland (scrub) was until three or four years ago home to a colony of nesting meadow pipits, said to be the closest to Central London; sadly only visitors of this species now appear on the Scrubs. A likely major cause of this is the disturbance by dogs and their walkers hence we support the inclusion under **Proposals: Meadow management to include: ... Selected secure location maintained for ground nesting birds.** We would hope to see this achieved without causing resentment on the part of those users of the Scrubs who enjoy their dogs' ability to roam without restriction.

We also take note in **Proposals** under **Legend of Long grass/meadow: Most areas to be managed for improved biodiversity.** We take this to apply to the central grassland/scrub which includes the area selected as a secure location under **Meadow management** (see above) as would **Enhancing ecology and biodiversity: The scrub habitat on site needs to be managed carefully to prevent the dominance of certain species.** We repeat our remarks about the need for care in reduction of certain shrubs and are concerned in case short mowing should be considered for this area: this would simply deprive the pipits of cover for nesting sites. Such cutting as is necessary should be rotational. We have been given some

specialist advice on this issue which we would be happy to share with LUC should this be of value.

We have referred in 8. above to the sufficiency of the existing model aircraft flying zone. Any carving out of more space for this activity over the central grassland/scrub (if that is what is intended) would seem to be inconsistent with the Masterplan's proposals for improved biodiversity to which we have referred in this paragraph.

13. We have the following additional points:

- **Proposals 3 Small stream.** We are unaware of this "stream" but oppose creation of wetland. The NW corner is a rich habitat which should be left undisturbed
- **Proposals 9 Varied wildflower meadows.** Wildflower meadows are generally welcome but we consider the area proposed is too extensive and inconsistent with "more wild than tamed"
- **Proposals 12 and 13 Orchard, wildflower and Flowering shrubs.** These too are in the NW corner which we consider should remain undisturbed, particularly in light of proposed HS2 works along Old Oak Common Lane.
- **Proposal 15 Spring bulb planting to Braybrook Street boundary.** If this means replacing the existing wildflower mound along the verge, we oppose it.

Richard has been invited to give an update to the meeting on the 15th April.

HS2 Station on Old Oak

HS2 has recently published a summary of its planning application to the OPDC for Old Oak Common Station. It can be found on:

<https://www.gov.uk/government/news/hs2-reveals-old-oak-common-station-designs-as-work-ramps-up-on-west-london-super-hub>.

Work at Old Oak Common to prepare for construction of the station has been ongoing since 2017 led by enabling works contractor Costain Skanska JV. The site is near ready to be handed over to HS2's station construction partner, Balfour Beatty Vinci Systra JV (BBVS), which was awarded the contract last September.

The submission also includes an application to lower and widen Old Oak Common Lane in order to improve access to the station for buses and pedestrians. We shall have to scrutinise the application to see how it might affect access to the west of the Scrubs.

Scrubs Maintenance

The most pressing concern, highlighted by heavy rain over a sustained period, is the maintenance of paths so that they are not reduced to a quagmire as has been the case with much of the path below the embankment. Contrary to hopes we expressed in last year's Report, this is not within the EAM with HS2 (now "Masterplan", see above). We have raised the subject more than once with Richard Gill (and made

practical suggestions) as it seems to us it should come within routine maintenance, concerning which there has been some uncertainty. There also seems to be lack of agreement as to an acceptable surface that could cope with heavy rainfall without the appearance of a metalled road through the Scrubs.

We hope to obtain clarification from Richard when he speaks at our AGM.

Overground Stations on Old Oak

With the loss of the Car Giant site for development (see below), Hythe Road Overground Station now seems to be off TFL's agenda. The Old Oak Common Lane Overground Station on which there was consultation in 2018 seems still to be proposed and indeed would seem to be indispensable to Old Oak Common (HS2 and Elizabeth Line) Station travellers who wish to connect to other London destinations.

The OPDC

OPDC Chairman and Chief Executive

Liz Peace remains Chair of the OPDC. David Lunts who was appointed interim CEO last year has been confirmed as CEO.

OPDC and the Scrubs

We have nothing to add to last year's report concerning the status of the Scrubs within the OPDC boundary, i.e that there seems little appetite for change on the part of the OPDC or LBHF, but the London Assembly is growing increasingly restive concerning the OPDC's performance in general and in particular with regard to its handling of planning proposals for the Car Giant site (see below).

OPDC Draft Local Plan Consultation

The first OPDC Draft Local Plan was published four years ago in February 2016. We were told it would be adopted (i.e brought into effect) in the Spring of 2017 but this has not yet happened. There have been three consultations and there were several sessions of the Examination in Public by a planning inspector of the supposed final version(s) last year but there is still uncertainty as to whether it will be adopted this summer (the last anticipated date for adoption that we can discover). The principal obstacle in the way of adoption is the loss of the Car Giant site north of the Canal (part of Old Oak North as described in the Draft Plan) for development which has meant drastic revision of the OPDC's figures for homes and jobs. For the Scrubs this means a substantial reduction in the numbers of potential users of the Scrubs who might seek access from the north but there is still scope for development as originally proposed around the HS2/Elizabeth Line station and possibly along the northern perimeter of the Scrubs to the east of the station. The OPDC is now concentrating on what they call the "Western Lands" and Park Royal which includes

the area south-west of the station across the road from Wells House Road where there could well be a proposal for high rise building.

How far these developments reduce the need for access to the Scrubs from the north we can only tell as and when more detailed proposals become available. We summarised our detailed responses to the consultations when David Jeffreys and MS appeared before the inspector at the Examination in Public on 8 April 2019, the day before our last AGM. We opposed direct access from the station to the Scrubs but accepted a point to the east of the station (proposed by the OPDC as “additional”) as the sole access from the north. Whether we maintain such acceptance will depend on the nature of the revised proposals.

We also opposed proposed cycle and pedestrian paths in particular east-west across the Scrubs (supported by among others the Wells House Road Residents Association). In addition we sought a firm commitment to the retention of the embankment, supported by several others including WSCT. It cannot in any event be removed during the anticipated life of the Local Plan (20 years) because of the existence of the IEP Depot (formerly the Eurostar stabling sheds), nor could direct access from the station take place during the same period, for the same reason.

Grand Union Alliance (“GUA”)

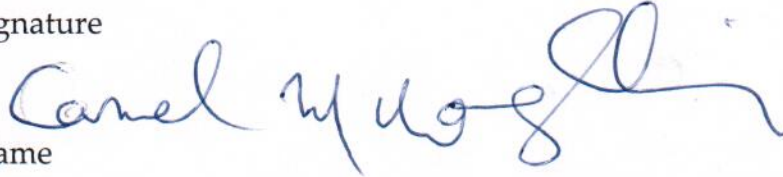
We continue to exchange views and information with the GUA, St Quintin and Woodlands Neighbourhood Forum and the Old Oak Neighbourhood Forum.

<u>Friends Accounts</u>	<u>2019-20</u>	<u>2018-19</u>
Income	590.00	125.00
Interest on deposit a/c	2.53	2.53
Expenditure	504	0
	_____	_____
Cash at Bank		
Barclays current a/c	1271.16	230.83
Paypal a/c	331.50	331.50
Scottish Widows	1271.16	1268.63
Total	£1698.68	£1600.13

The trustees declare that they have approved the trustees' report above.

Signed on behalf of the charity's trustees

Signature

A handwritten signature in blue ink, appearing to read 'Carmel McLaughlin', written in a cursive style.

Name

Carmel Mc LAUGHLIN

Secretary/~~Chair~~

Date 14 March 2020