



*Above is a photo of the Jersey Tiger moth, one of several species of Lepidoptera (some rare) found on the Scrubs. Members of our group have raised the importance of ensuring that the habitats of insects and other animals are protected when public works are being carried out in the Scrubs area. (Photo kindly supplied by Stuart Wise)*

## *Friends of Wormwood Scrubs*

### **Newsletter No. 5 August 2019**

Here at last is this year's Friends of Wormwood Scrubs Newsletter. Again, I apologise for the delay. The current threat to the Linford Christie Stadium (the LCS is an inherent part of the Scrubs) and its environs has made it a frenetic year for the Committee (and many members) in terms of organising and attending meetings, analysing documents, and preparing leaflets and other communications designed to raise awareness of the need to protect the whole Scrubs. This newsletter will bring you up to date on the latest LCS news (page 6).

Before listing developments since 2018, I should mention that the Friends is holding a **social gathering on 11 September at 6.00pm at the Pavilion**. The

Committee hopes everyone will come along. It will be an important meeting. Not only will it give us a chance to celebrate FOWWS' 21st birthday, but also to discuss future activities to protect the Scrubs – everyone needs to participate. See you then – we'll send you a reminder nearer the time.

*The Editor*

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## AGM

The FOWWS Annual General Meeting was held on 9 April 2019. Miriam Shea decided to step down as Secretary and Carmel McLoughlin has taken over. We thank Miriam for all her hard work She remains a member of the FOWWS Committee and still sits on the Board of the Wormwood Scrubs Charitable Trust as a non-voting WSCT member. The AGM minutes are available on the FOWWS website.

## HS2

- *Station plan*

In February this year, HS2 presented its draft design for Old Oak Common Station (to be built on the northern border of the Scrubs). It will have six underground platforms that will eventually link with the Elizabeth Line. FOWWS was re-assured that there is to be no high-rise building directly above the station, and that no direct access onto the Scrubs is included in their plans. (This does not necessarily exclude such access as part of some future OPDC Local Plan, see below). The only concern is the fate of a triangular green space next to Scrubs, which is currently being used for construction materials. It is likely to be developed by the OPDC (see below).

- *Preparation works*

Ground works on the Scrubs to carry out geological surveys of the area around the station have now been completed. Surveys have been carried out for the re-routing of the Stamford Brook Sewer on the north side, but work proper will not begin until the Spring of 2020.

- *Ecological enhancement*

HS2 has given the Trust/LBHF £3M for the ecological enhancement of the Scrubs, and Richard Gill was appointed as Wormwood Scrubs Development Officer to coordinate an ecological strategy for the Scrubs. He has commissioned a topographical survey of the Scrubs, which has just finished. We hope that he will come to the September meeting to explain more about the masterplan for the Scrubs.

- *Further available funds*

HS2 is also offering further funding for community projects of up to a £1M. The Community and Environment Fund is targeted at the voluntary/ community sector, and is for projects such as nature conservation or enhancement/replacement of sports and recreational facilities. This is something that FOWWS could apply for.

## **OPDC developments**

- *The Local Plan*

The Old Oak and Park Royal Development Corporation (OPDC) is now the planning authority for Wormwood Scrubs Common (but not the Linford Christie Stadium, which remains within the LBHF planning area), as well as the development land to the north. The Committee continues to scrutinise the activities of the OPDC, in particular the formulation of its Local Plan. Following three consultations, to which FOWWS made submissions, the draft Plan underwent an independent examination including public hearing sessions which finished in July. Committee members David Jeffreys and Miriam Shea made submissions at the hearing relevant to the Scrubs and were supported by other FOWWS members.

FOWWS' main concerns have been control over the level of access to the Scrubs, retention of the ecologically important embankment, limiting or avoiding cycle and pedestrian routes across the Scrubs, and the nature of any development along its borders. The OPDC maintains its support for direct access from the new HS2 station to the Scrubs, but this cannot realistically be achieved during the lifetime of the proposed Plan (20 years) because of the existence of the IEP Depot along the northern edge. The Plan is already more than two years' late in its adoption (when it comes into force) and is unlikely to be adopted this year (see *OPDC planning issues* below).

- *Cycle route on the Scrubs*

There is also some concern that, as part of the Plan, a cycle superhighway going east to west across the Scrubs is being investigated by Transport for London. Such plans would go out for consultation, so we will be keeping an eye out for this unsuitable proposal.

- *OPDC planning issues*

Other developments that we are watching with interest include the 'challenging' issues regarding OPDC's well-publicised fractious relationship with the car dealer Cargiant, which owns a large swathe of the potential development land just north of the canal. This, together with political uncertainties about HS2, the unanticipated unavailability of 'prime' land just north of the Scrubs (see Newsletter no. 1) has rubbed away some of the gloss from the OPDC vision.

## **Wormwood Scrubs Charitable Trust News**

The Trust meets four or five times a year, and is responsible for the maintenance and servicing of the Scrubs and also its finances.

- *Kensington Aldridge Academy (KAA)*

KAA has now moved from its temporary accommodation on the MOD Parade Ground on the east side of the Scrubs back to its home next to Grenfell Tower. The DfE is nevertheless retaining the use of the site for another year, as a contingency regarding the dismantling of the Tower.

- *LPN site*

The Trust has also signed a lease with London Power Networks (LPN), which uses a site that provides access off Scrubs Lane to a service tunnel just south of its substation near Mitre Bridge.

- *Improved Scrubs finances*

The above and other sources of income have greatly improved the finances of the Trust, creating a budget surplus, and thus, in principle, making more money available for the maintenance of the Scrubs, including the LCS (more on this later).

- *Schools use of the Scrubs*

The Trust is keen to encourage use of the Scrubs by schools, for example, through the Forest Schools Programme. Old Oak primary school, which is close to the Scrubs, is already using the Scrubs in its Nature lessons.

## **Protecting and enhancing the Scrubs**

FOWWS members continue to keep a look out for activities that disturb wildlife and spoil enjoyment of the Scrubs. We also encourage members to suggest improvements that could be made. Over the year, the Committee has discussed the following, and where appropriate, alerted the Trust:

- (i) Damage was done earlier this year to an important butterfly habitat by LPN. A management plan has now been put in motion by LPN.
- (ii) Coaches have been trundling across the Scrubs to the LCS on grassy paths not meant for motor vehicles. This is being looked at.
- (iii) There have been issues with some professional dog-walkers, resulting in fines for those flouting the rules.
- (iv) Litter is becoming less of a problem, with volunteers tackling areas such as the south border of the Scrubs. More bins have been installed, but there is still a dearth of them along the southern walk in the wilderness area.
- (v) Drones (and some model planes) remain a considerable problem, with some of them flying right over houses in the Old Oak Estate and at unsocial hours (eg, 8.00am on a Sunday morning, when permitted hours do not start until 10.00am). If you know someone who does this, can you ask them to fly their devices only within the designated area and time period.
- (vi) Some Scrubs users with young children have complained about difficult access to the play areas, and also about overgrown edges with stinging-nettles and brambles spreading over the south-side hard footpath. The

question of (soft-core) pathways in appropriate areas is for future discussion. The path overgrowth has now been cut back, but users need to be aware that a supply of nettles is an important resource for some insects, so it's question of finding the right balance.

(vii) Signage – the signs on Wormwood Scrubs are becoming rather dilapidated, and give the impression to outsiders that no one cares about the future of the Scrubs. The current signs are unreadable and in the wrong places. This is something that FOWWS and the Trust need to look at, as they offer an important tool for promoting the ecological wealth of the Scrubs.

### **News about the Linford Christie Stadium**

This year has been a tumultuous period for Wormwood Scrubs lovers and concerned local residents, with the fear that the Linford Christie Stadium may be converted into a massive entertainment and business venue. So that everyone catch up and usefully contribute, we record the recent sequence of events, what we've done so far, and consider what we should do in the future.

- *History briefing*

Following the proposal by Queens Park Rangers Football Club to bid to move to the LCS on the Scrubs, in 2018 the London Borough of Hammersmith and Fulham commissioned a viability study on the future of the LCS from a company that advises on development schemes, Earth Regeneration Ltd.

In parallel, on behalf of FOWWS, Kensington Dragons Football Club, which pays to use the LCS and supports local community football, funded an independent review of options for the LCS by Campbell Tickell, a consultancy specialising in community projects. This is available on the FOWWS website.

LBHF commissioned a further expensive report from the stadium architecture company, Populous, regarding options. Neither Council report has been made public. However, by January 2019, it became clear that the Council Leader, while unimpressed by the QPR bid, was particularly enthused by the notion of a grand scheme for the LCS whereby it would become 35,000-45,000-seater entertainment venue (music and sport). The plan was that the Council would sell a lease on the LCS.

Populous came up with four options (kept secret by LBHF but leaked via a Web blog), which revealed the relative profits.

- Option A, costing £425.7M: 45,000 seats (including a field that could be raised and become the roof), an indoor hall and extensive conference/banqueting facilities. Annual balance: profit of £41.4M.

- Option B, at £351.2M: 42,000 seats without the raised roof. Annual balance: profit of £16.2M.
- Option C, at £316M: 35,000 seats plus commercial/event use. Annual balance: profit of £8M.
- Option D, at £70M, 35,000-seater stadium funded by its occupier, (for example, QPR). Annual balance: loss of £12 million.

As a more suitable alternative, FOWWS has been promoting the idea of a community sports centre that could be used by local amateur sports groups, schools and all local residents. The Populous report said that this could cost about £30M and make a small profit.

- *Public consultation*

The Council then – with the Charitable Trust – launched a public consultation on LCS development (finished 12 June) based on three options: 1. do nothing; 2. a community stadium; and 3. a full commercial stadium. (Option 2 was strengthened at the insistence of the FOWWS nominees on the Charitable Trust.) The Council sent out letters about filling in the consultation form (buried in the LBHF website) to its constituents in its four northern wards – but, strangely, omitted to send the letters to the residents living nearest the LCS who would be most adversely affected by its preferred Option 3 – that is, residents in the Old Oak and College Park ward – and also adjacent wards in the Royal Borough of Kensington and Chelsea, and Ealing (these two boroughs effectively border the Scrubs east and west, so they should have been consulted). Having learnt of the consultation only via FOWWS, Old Oak residents demanded to receive the letter, which they eventually did.

As a result, the FOWWS committee agreed to produce and circulate a leaflet regarding the options to all areas likely to be affected by Option 3. (Thank you to all those who helped with the funding of it.) We also sent out press releases to the media and statements to opinion-formers giving our objections to a large-scale stadium and supporting Option 2. I'm sure you are all familiar with these objections.

- *Kensington Dragons plans*

In the meantime, Kensington Dragons Football Club (KDFC), which pays to use the LCS, drew up plans for refurbishing and making interim improvements to the sports pitch areas, which it is prepared to fund. The plans were presented to the Council and the KDFC is now awaiting confirmation of approval of those plans.

- *Stakeholders meeting – investing in a community-led stadium*

In order to move forward the idea of a community-led stadium/sports centre, the FOWWS Committee hosted a meeting of stakeholders at the end of March. Attendees included: the FOWWS committee, Thames Valley Harriers (which has a lease on the LCS), the Imperial College Development Director (Imperial College is extremely keen to invest in a sports centre for its students and staff, of which many now live locally, and are part of the community), KDFC, London Sports (which uses the baseball pitch), and local resident representatives from the Old Oak Estate, Brickfields, the St Quentin area and Wells House Road. Imperial College had already presented some ideas to the Council. One Old Oak resident had drawn up her own imaginative plans that could be incorporated into a community-based centre.

The Development Director of Imperial College Healthcare also attended, and gave her views on the effects of a large development on the adjacent Hammersmith Hospital. The Hospital would be against a major development, and is concerned about access and loss of parking. Imperial College is also extending its advanced biomedical research campus, which is right next to the LCS.

The meeting was very successful and there was a second, constructive meeting was held a few weeks later to take the idea further forward. We will keep you informed on progress.

- *The LCS as a Community Asset*

The FOWWS Committee has also applied to LBHF to register the LCS as an ‘Asset of Community Value’. A local community group can nominate a piece of land whose use furthers the cultural, social or leisure interests of the local community (under the 2011 Localism Act). If accepted, and the Council decides to sell the asset, then the community group must be notified and can delay the sale, giving time to raise funds to buy the asset. Once approved, an asset remains on the list for five years. While this process would not in itself stop development, it could delay it to allow better decisions to be made.

- *Scrubs finances and the cost of maintaining the LCS*

The main reason the Council has put forward for building a large stadium on the Scrubs is the claim that the LCS operation is running at a loss, and it cannot afford to improve and maintain the increasingly dilapidated stadium. This argument is now in doubt, however.

Earlier this year, KDFC undertook a detailed independent analysis of the Scrubs accounts including the LCS. (One of the contentious issues is that the



considerable income generated – ca. £600,000 – is simply added to a pot of money used to maintain all LBHF green spaces). This has been known for some years, and at least informally acknowledged by Councillors and Officers. The maintenance contract is scheduled for renegotiation from 2021, which is when FOWWS hopes there will be a properly independent contract for the Scrubs alone.) The analysis indicates that, if finances were managed correctly, and the LCS fully exploited, the Scrubs could generate enough income to maintain the LCS.

Furthermore, thanks to income from KAA and UKPN, an annual surplus of about £350,000 has been generated in the past two years, and reserves are now at a more comfortable level.

- *Results of the LCS consultation*

The results of the consultation have now been released and we have circulated them to the membership. They are disappointing but in some ways not surprising. Eighty per cent of respondees from the four northern wards favour Option 3 apparently. Most of these constituents do not live anywhere near the LCS and it is likely that a very large number are QPR supporters urged to respond by their Club, or are residents living in the Loftus Road area and are more than happy to see the Club move away. There has been no meaningful breakdown of the responses or weighting in terms of respondees living closest to the LCS. Indeed, those living in affected bordering boroughs were not consulted at all.

The Council – well, technically the Charitable Trust, but paid for by the Council – is now hiring a fresh team of consultants (at a cost of up to £400,000) to look further at both Option 3 and Option 2.

- *Major obstacles to development*

The Council acknowledges that there are very significant obstacles to Option 3, in addition to the financial ones. There are huge problems of access, transport and parking. The Hospital is particularly worried about the impact on its parking facilities. And perhaps the most important obstacle is the fact that the LCS is situated on Metropolitan Open Land and is subject to the Wormwoods Scrubs Act; it is hard to see how an enormous event and business venue would comply with the terms of the Act.

In addition, LBHF has one of the lowest areas of green space per resident in London, and is set to become even more densely populated. There is no major public sports centre within the Borough. The Council has recently claimed that it has committed itself to improving the health of its residents, combating climate change, improving air quality and creating more green

areas – all of which is hardly compatible with a massive commercial stadium complex built on its largest green space.

- *Future policies and actions*

We must now decide what we are going to do next, which is why we are asking you to come to the gathering in September. We want members to participate and contribute to a range of activities.

While the present Committee employs its voluntary time dealing with administrative aspects, attending Trust meetings, making influential contacts, and collecting and analysing relevant documents, we need to expand our activities into other areas, in particular in the communications and social media areas. However, everyone has only a limited amount of time.

We therefore hope to harness expertise and energy across the membership by setting up working groups for particular tasks, eg web and print design, social media, fund-raising, building up contacts with other relevant interest groups and the press, and expanding the membership. Plus, members need to feel they can put forward their own ideas.

For example, many people have asked if the LCS could be updated and improved with decent changing rooms, public toilets, a café and Nature Centre. At a recent talk that FOWWS Committee members gave to Imperial College students and staff (Hammersmith Hospital campus), the attendees asked if there could be more information available about the Scrubs ecology and whether there could be organised walks around the Scrubs. Better signage has already been mentioned. Certainly, we need to promote the Scrubs much more as a nature reserve, and as a place of calm and exercise. I hope you will come forward with practical ideas, as well as offers of time to help implement them.

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### **About the Friends of Wormwood Scrubs**

All of you receiving this newsletter have signed up to be Friends of Wormwood Scrubs – an active lobbying and pressure group that aims to protect the unique nature of Wormwood Scrubs Common. You have appointed a Committee, which – as volunteers – does its best not only to track and influence any changes, activities or decisions concerning the Common and its environs, but also to monitor its maintenance.

### **Current committee members**

Chair: Stephen Waley-Cohen ([stephen@swc-office.co.uk](mailto:stephen@swc-office.co.uk))  
Secretary: Carmel McLoughlin ([carmelmcloughlin@icloud.com](mailto:carmelmcloughlin@icloud.com))  
Treasurer: Tony Curzon Price ([tony@curzon.com](mailto:tony@curzon.com))  
David Jeffreys ([david\\_jeffreys2@hotmail.com](mailto:david_jeffreys2@hotmail.com))  
Smita Davé ([eynham@gmail.com](mailto:eynham@gmail.com))  
Miriam Shea ([miriamshea@btinternet.com](mailto:miriamshea@btinternet.com))

Newsletter editor: Nina Hall ([nina@ninahall.org](mailto:nina@ninahall.org))

Stewart Dalby, as President, also attends meetings ([dalbygray@aol.com](mailto:dalbygray@aol.com))

The London Borough of Hammersmith and Fulham are the Trustees of the Charitable Trust which owns the Scrubs, and the two committee members from the Friends sit on the Trust Committee, along with three Councillors supported by the relevant Council Officers.

Wormwood Scrubs Common includes a large wilderness area – home to many animal species – and also sports and activity areas including the Linford Christie Stadium. It is under more threat than ever from development, so please encourage your friends and neighbours, who care about the environment and open access to London's green spaces, to join us and have a say in its future. Membership is free!

You can join via the FOWS website:  
<https://www.friendsofwormwoodscrubs.org.uk>

*In the light of the new data protection regulations, we remind you that everyone receiving FOWWS emails has asked to do so. You can unsubscribe at any time by clicking on 'unsubscribe from this list' at the end of the email.*