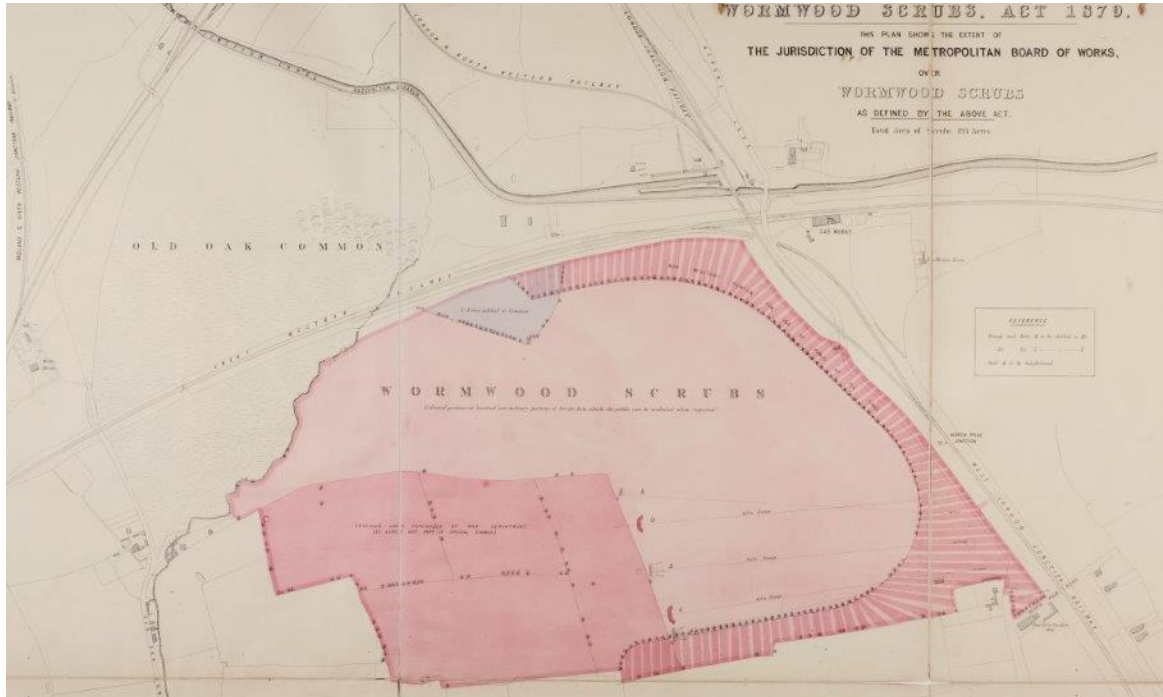


Friends of Wormwood Scrubs

Newsletter No. 6 March 2020



Here is the 2020 spring issue of the Friends of Wormwood Scrubs (FOWWS) newsletter. In these newsletters, the Committee keeps you up to date on the latest developments regarding Wormwood Scrubs Common, its public amenities and rich biodiversity, which as you know are under constant threat from unsuitable development, as well as sometimes suffering from poor maintenance.

The above maps – relatively not to scale of course – remind us of the Scrubs’ past and present appearance. In 1879, when the Wormwood Scrubs Act came into being, the prison had just been built. Later in 1902, Hammersmith Hospital started its life as a workhouse and infirmary. There was as yet no housing in the vicinity and Old Oak Common extended far north of the then Great Western Railway.

Today, 140 years on, Wormwood Scrubs is inevitably surrounded by buildings, and railway and road infrastructure. Plans to increase local housing density and rail connections – and with it much increased climate-changing human activities – means it is all the more important that we preserve and look after every part of this precious (‘more wild than tamed’) green space.

The Editor

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Charitable status

The Committee is pleased to announce that the Friends of Wormwood Scrubs (FOWWS) is now a registered charity: Registered Charity number 1187120. We thank David Jeffreys for all his hard work on this, in particular in preparing a new Constitution that complies with the requirements of the Charity Commission. As a 'Charitable Incorporated Organisation', we will need to file with the Commission our annual accounts and annual return, and a Trustees' report. This will allow us to fund-raise and register with HMRC for Gift Aid.

A new website and improved communications

We are in the process of setting up a new and more responsive website www.friendsofthescrubs.uk, to incorporate much more information including the Constitution, funding opportunities, the newsletters, and details of projects and campaigns – plus photos of course. We are also gathering together a small group of people to improve outreach via, for example, social media – but also to develop non-online strategies to reach local and other interested communities. If any members are interested in participating, or have particular communication/design skills to offer, please let the editor know.

- ***#GoParksLondon***

This is a new initiative set up by CPRE London (CPRE stands for The Campaign to Protect Rural England) and the London Friends of Green Spaces Network to raise awareness and generate support for protecting the

600-odd parks in London for future generations. It forms part of the 'London National Park City' campaign. FOWWS was invited to provide details and pictures for a listing on the website, which we have done. Our park page can be viewed at:

<https://www.goparks.london/park/wormwood-scrubs>

- *Imperial College talk*

Last autumn, two committee members gave a talk to research students and academic staff at the Imperial College campus next to the Hammersmith Hospital. Many of them venture on to the Scrubs during breaks but said they knew little about it. We explained the history and its value as a nature reserve, as well as the current threats being faced (see below). There were suggestions that there needed to be more information sited on the Scrubs, together with suggested routes for walking. This feedback has been passed to the Council and is incorporated in LUC Masterplan below. (I will forward the written version of the talk to members, as it might provide a useful background summary for those new to the Scrubs, *ed.*)

Improving and using the Scrubs

- *The LUC Biodiversity Masterplan*

As mentioned in previous newsletters, HS2 has given LBHF/WSCT £3M for the ecological enhancement of the Scrubs. Richard Gill was appointed as Wormwood Scrubs Development Officer to oversee this. Land Use Consultancy (LUC), a landscape and environmental architectural company, was then appointed by HS2, with support from the OPDC (Old Oak and Park Royal Development Corporation, which is the planning authority for the Scrubs), to develop a Masterplan intended to improve and enhance biodiversity on the Scrubs.

The official LUC message on the LBHF website is:

“We are developing a masterplan that will improve the Scrubs, allowing more people to enjoy the benefits of exercise and relaxation. The sports pitches will be kept with plenty of open space to allow exercise and recreation.

Most of the work we plan is in the west of the Scrubs. We plan to open up some areas of woodland allowing more plants and flowers to grow, plant more trees to give a wider range of tree species, maintain long grass areas so that they are not dominated by bramble and provide more features such as ponds, bird-boxes and hedges. This will increase the opportunity for a wide range of plants and animals to live here. It will increase biodiversity and increase the possibility that we might one day see a lizard, a meadow pipit or even a hedgehog.”

(You can already see lizards regularly on the Scrubs in the summer, ed.)

In February 2020, LUC held two drop-in sessions where the public could examine the draft masterplan and respond. The plans were also put up on the LBHF website (www.lbhf.gov.uk/wormwoodscrubspan) with an opportunity to provide feedback via a questionnaire. You can also reply separately to parks@lbhf.gov.uk. We hope that as many people as possible will have given their views by the deadline of 15 March.

The Committee broadly finds the Masterplan acceptable, but has reservations on a number of issues including the proposal for a pond, the type of signage and information to be supplied and the positioning of any planted trees. We feel strongly that the concept of ‘more wild than tamed’ must be adhered to. One concern is the particular maintenance needed for any features that are rather contrived. The positioning and style of entrances seem satisfactory; however, the proposed bridge on the northern boundary seems pointless since there is likely to be little development, and therefore required access, in that area in the near future (see OPDC below). The Committee has prepared a formal response on behalf of FOWWS but may add further points before the 15 March deadline.

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 10 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 ongoing 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 north-west corner of the Scrubs at the confluence of paths from where you can see views out to east London, including the London Eye and the Shard. It will most likely block the sunset views that currently people can enjoy from the eastern boundary. In general, we do

not favour the 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 the south-east 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 a 'runway' 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 are wet, but much of it is hard surface, and following the recent clearing of undergrowth is an attractive amenity that should not be 'wetted' 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.

- *Scrubs maintenance*

Maintenance is a key issue in the context of the Biodiversity Masterplan. At the recent WSCT meeting, it was proposed that the current grounds maintenance contract (with IdVerde and which covers all parks) should be extended for a further year until April 2022 to allow time to design a better specification and a new procurement process. This will include obtaining a price and specification for Wormwood Scrubs that could be part of, or separate to, the overall contract. It also makes sense to wait until the Biodiversity Masterplan has been fully specified.

It is intended that the HS2 funding for ecological enhancement is split between the actual implementation of the Masterplan and the ensuing required maintenance. However, it is not yet sufficiently clear how expert maintenance would be funded in the more long-term.

- *Schools*

The Biodiversity Masterplan does involve providing features that encourage schools to use the Scrubs in their teaching programmes. Old Oak primary school, which is close to the Scrubs, is already using the Scrubs in its Nature lessons. Ark Burlington Danes Primary Academy on Du Cane Road has begun a programme of outdoor learning for pupils, which is making full use of the Scrubs.

- *Scrubs Lane entrance*

Separately, the OPDC has allocated funds of £180,000 to improve the Scrubs Lane (Mitre Bridge) entrance onto the Scrubs. This will involve widening it, providing better signage and an improved surface.

- *Travellers on the Scrubs*

Unauthorised camping on the Scrubs by travellers and others continues to be a problem. Last October, travellers accessed the car park, and were later removed under the terms of the Criminal Justice and Public Order Act. There was the inevitable clean-up operation afterwards. It is important that improvements to all Scrubs entrances involve making them secure to deter future incursions.

- *Volunteer tree-planting*

Recently it was suggested that some saplings that were going spare could be planted in the woodland areas of the Scrubs by volunteers. While a laudable idea in some respects, it's now been agreed that any tree-planting should be done within the context of the Masterplan to ensure the optimum outcome for the Scrubs ecology and biodiversity (see also 'General plant maintenance' below').

- *Paths and bad weather*

This winter has seen some of highest rainfall in recent times, and this has affected the Scrubs significantly. The Common is subject to water-logging anyway and some of the paths have been impassable, with the result that walkers have been making new paths where they shouldn't. We would ask all Scrubs users to avoid making the situation worse. It is clear that with the prospect of changing weather patterns, there will have to be a new strategy for dealing with flooding (mainly on path areas) on the Scrubs. The nature of paths does not feature as an issue in the current Biodiversity Masterplan. The Committee is thus urging the Council to look at ways to treat paths, for example, with wood chippings and other eco-friendly materials in order to keep them passable.

- *Children's playground off Braybrook Street*

The play area for young children is well-used by local families. Issues about making access easier for pushchairs and toddlers have been raised and also about the suitability of equipment that allows toddlers to play independently. It has been suggested that the additional funds available from HS2 might be made available to improve the children's playground. This is certainly something we can look into in the near future.

- *Recent and general plant maintenance*

Last year, 29 trees along the northern border were identified by the Council as either dead or with poor vitality. Richard Gill reports the following and asks for comments:

Dead wood piles have been left stacked as a valuable resource likely to enrich the fungal and invertebrate fauna in the tree line area. They may eventually offer habitat to smaller mammals or the common lizard as places to breed or hibernate. Some smaller trees have been removed where growing directly into the fence line, where concerns for safety were clear that people could scale the tree and enter the rail land. The canopy tip reductions of dead wood have been carefully carried out to encourage new growth. An anticipated result of the habitat management is an increase light and rain to the herb layer where natural regeneration from younger, understorey saplings will help to diversify the age range and continuity of the canopy cover. We hope to see an improved herb layer and reduction of dead wood falling in this area as a result through the desire line trail along the boundary frequently used by walkers and dog walkers.

As the overall AEM (Alternative Ecological Mitigation) project funded by HS2, one of the proposals is likely to be the creation of this type of small clearing in the woodland to encourage biodiversity improvement. We would therefore value any comments the Friends have on this work.

Chestnuts

We don't have any record of any treatment being carried out on these trees. Although they form a fine feature, their long-term value is currently uncertain. With minimal management, other trees will eventually shade out the chestnuts as they appear to be slower growing and do suffer from diseases such as canker. Positive management of this feature may enable it to be retained but it will remain somewhat of an anomaly in an informal woodland and will offer less biodiversity opportunity than native trees. Again, it would be good to hear the Friends views on this.

Knotweed.

Management of the knotweed continues on the embankment. We are aware that there are still a number of stands of significant growth especially on the upper parts of the bank which have attracted comment. Most of the knotweed area has been controlled and significantly reduced. The contractors' view is that those remaining are to be expected as the plant will remain vigorous especially on the edges. The control of knotweed is a long-term process usually taking 3-5 years. A further treatment will take place later this month and further visits are planned for at least the next two years.

Hogweed

This is a problem mainly in the meadow area. It is spread by birds, so although we can control a clump when it is identified it will then pop up in another area in the following year. Another problem is that it is difficult to distinguish between the common Hogweed and the more troublesome Giant Hogweed. This plant can cause nasty blisters if you make contact with it and it should be avoided. If you suspect you have found Giant Hogweed, please report it to Parks@lbhf.gov.uk

Brambles management

The encroachment of brambles onto the meadow areas is recognised as a problem, although they do provide cover and forage for some species, their overall effect would be a reduction in biodiversity if they are not controlled. Currently control of brambles is not specifically within the GM contract and we need additional resources to tackle this. One of the aims of the new specification which the AEM project is developing is to ensure that they are properly managed in the future, but our contractor and volunteer groups can work with the Friends, as we did last year to clear the northern paths of bramble, if we can identify particular areas that should be cleared.

- *Dog-walking*

While private walkers and their dogs are welcome on the Scrubs, increasingly, commercial dog-walkers, often with many dogs, from outside the area are using the Scrubs, effectively as a free business resource. To better regulate numbers of dogs on the Scrubs and other local parks, and avoid issues of dog control and fouling, LBHF will, from 1 April 2020, require all professional dog-walkers to be licensed. For local professional dog-walkers, the licence will cost £175 a year; for those from outside the Borough, it will be £300 annually. Money from the licensing scheme will be put towards park maintenance and improvements. The FOWWS Committee is thus supporting the scheme.

- *West London Farm proposal*

The Committee recently received an invitation to support a proposal for a 'West London Farm' on the Scrubs covering 3 hectares, with a small entry fee. After careful consideration, the Committee has written to the proposer, explaining that, because of a number of significant legal obstacles that would stand in the way of the proposal, and a general desire to avoid all further encroachments into the 'more wild than tamed' open spaces, it could not support it. It was felt that other west London spaces might be more suitable.

The future of the Linford Christie Stadium

As you know, one particular area of the Scrubs is under threat from development, and that is Linford Christie Stadium (LCS). The Council wishes to convert this amateur athletics and football centre into a massive commercial entertainment and business venue. Last year, LBHF carried out a

rather piecemeal public consultation (see last newsletter for details), in which people were asked to choose between three development options: 1. do nothing; 2. a community stadium; and 3. a full commercial covered stadium (45,000 seats and suitable for events including concerts, trade shows and exhibitions, as well as capacity for football and other sports provision). We think that option 3 would pretty much destroy the Scrubs as we know it, and cause huge disruption to the local neighbourhood – as well as being at odds with the Borough Leader’s recent ‘Climate Emergency’ proclamations about aiming to be the [“greenest borough in Britain”](#).

The results seemed to indicate that the majority of respondees wanted Option 3. However, it was very clear that the results were unbalanced; that there was an overwhelming response instigated by Queens Park Rangers football club because it wanted to acquire the LCS land to build its new football stadium. Furthermore, very-much-affected residents in neighbouring boroughs had not been invited to participate.

- *The Consultants*

The Council then went ahead and appointed consultants (called ‘In Partnership With Ltd’) to study option 3 (and option 2) and develop outline business cases. Two of our Committee met with the consultants. They stressed that option 2 should also be properly assessed, and encouraged them to speak to all the stakeholders who might be involved (Newsletter 5 has the stakeholder details). The consultants indicated that they had taken onboard the biased nature of the public consultation. A report should be forthcoming for the September 2020 meeting of the WSCT at the latest. We will let you know as soon as we hear something.

- *QPR status*

In the current context, the situation for QPR is uncertain. Apparently, QPR will consider the LCS move only if it can secure the freehold (legally not likely to happen), while the Leader of the Council insists that any arrangement must be on a commercial leasehold basis. There has now been some speculation that the heavily loss-making Club might be better off moving further west. Furthermore, the QPR bosses admit that the development of the Club’s new training ground in Southall is the main priority, which is another eye-wateringly expensive investment for them.

- *Kensington Dragons plans*

In the meantime, the youth football club, Kensington Dragons (KDFC), which pays to use the LCS, has drawn 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 some months ago, but with no definitive

response so far, although discussions with Council officers continue. However, the WSCT has said that it was reluctant to bridge the resulting funding gap of around £300,000, until there was sufficient information on the potential increase in revenue, and how the Council and the Trust would split financial responsibility.

One aspect that has come into focus as a result of KDFC looking more closely at the finances of the Trust and the LCS (see last issue), is that the Trust officers have now proposed carrying out a more detailed study of those finances. This can only be a good thing – particularly in connection with Option 2 if it is to be taken seriously, as it should be, and because the Trust accounts have recently been showing a surplus, if only because of the temporary extra rent being paid for the portacabins erected on the parade ground (they were used by Kensington Aldridge Academy pupils following the Grenfell Tower fire).

- *The LCS as a Community Asset*

Last year, the FOWWS Committee applied to LBHF to register the LCS as an ‘Asset of Community Value’. So far, we have had no meaningful response from the Council. *(A local community group can nominate a piece of land whose use furthers the cultural, social or leisure interests of the local community. 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.)*

HS2 Station

HS2 now seems certain to go ahead. The preparation work for construction of the Old Oak Common Station on the northern edge of the Scrubs is almost finished. HS2 has now submitted the planning application for the Station to the OPDC (for design details, see previous newsletter and the HS2 website). A decision on the planning application, which apparently includes a new public park to the west, is expected this summer.

The OPDC troubles

Last December, the OPDC announced that it was giving up on its plans to build thousands of homes just north of the Scrubs. The reason is, says OPDC, that recent increases in land values mean it cannot afford to acquire (by compulsory purchase) the Cargiant site. The Cargiant business will thus remain where it is for the foreseeable future, and will most likely expand its operations a little.

OPDC has therefore had to reduce the number of homes it can deliver. However, it is looking at other potential pieces of public land, particularly around the HS2 station and further west.

This change of direction by OPDC means further delays to the publication of what will be its fourth draft version of an OPDC Draft Local Plan, which now might or might not happen by the summer 2020.

The FOWWS Committee will keep an eye on developments, especially in relation to the Scrubs. One issue will be any new proposals for very tall buildings.

A New Chair for the Trust

Councillor Wesley Harcourt is standing down from his role as Chairman of the WSCT. We understand that Wesley feels that there are conflicts of interest with his other roles as Ward Councillor, Cabinet Member for the Environment and as a member of the OPDC Planning Committee. “I have had to absent myself from any discussions on more than one occasion where the Scrubs or the Linford Christie Stadium have come up,” he said. The Committee thanks Wesley for his skilled chairmanship, and looks forward to working with his replacement, Councillor Helen Rowbottom.

AGM

It’s time to start thinking about the AGM, which will be held on 15 April at 6 for 6.30pm in Brickfields Hall (Wood Lane Studios, 80 Wood Lane, London W12 0BZ). We hope that as many people as possible will come. Richard Gill will be our guest speaker. We will formally let you know the details soon.

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.

The Friends of Wormwood Scrubs is a registered charity, No. 1187120.

Current committee members

Chair: Stephen Waley-Cohen (stephen@swc-office.co.uk)

Secretary: Carmel McLoughlin (carmelmcloughlin@icloud.com)

Treasurer: Smita Davé (eynham@gmail.com)

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Website: Sarah Johnson (sarahcynthiajohnson@gmail.com)

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

Stewart Dalby, as President, also attends meetings (dalbygray@aol.com)

The London Borough of Hammersmith and Fulham (LBHF) are the Trustees of the **Wormwood Scrubs Charitable Trust (WSCT)** which owns and manages the Scrubs. Two committee members from the Friends sit on the Trust Committee as non-voting members, along with three Councillors supported by the relevant Council Officers. The Trust usually meets four times a year, and minutes and agendas can be found on the LBHF website. Meetings are open to members of the public, although some elements of the agenda may be closed to the public.

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! We have a chat-group whereby you can exchange views and information. The Committee attempts to keep you informed of relevant developments.

You can join via the FOWWS website:

www.friendsofthescrubs.uk

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