LOCAL GOVERNMENT
BOUNDARY COMMISSION
FOR ENGLAND

REVIEW OF
GREATER LONDON, THE LONDON BOROUGHS
AND THE CITY OF LONDON

LONDON BOROUGH OF HOUNSLOW

Boundaries with: RICHMOND UPON THAMES LB
BOROUGH OF SPELTHORNE in SURREY
and the BOUNDARIES BETWEEN THE LONDON BOROUGHS
OF HOUNSLOW and RICHMOND UPON THAMES and the
BOROUGH OF SPELTHORNE IN THE VICINITY OF KEMPTON PARK

REPORT NO. 652
INTRODUCTION

1. This report contains our final proposals for the London Borough of Hounslow's boundaries with the London Borough of Richmond upon Thames and the Borough of Spelthorne in Surrey, and the boundaries of all three authorities where they meet in the vicinity of Kempton Park Racecourse. In the main, we have proposed only limited change to these boundaries, with the intention of removing anomalies, for example, where properties are divided by a boundary. However, we have also sought to unite communities and areas of continuous development where this has appeared to us to be in the interests of effective and convenient local government. Our report explains how we arrived at our proposals.

2. On 1 April 1987 we announced the start of a review of Greater London, the London boroughs and the City of London, as part of the programme of reviews we are required to undertake by virtue of section 48(1) of the Local Government Act 1972. We wrote to each of the local authorities concerned.

3. Copies of our letter were sent to the adjoining London boroughs; the appropriate county, district and parish councils bordering Greater London; the local authority associations; Members of Parliament with constituency interests; and the headquarters of the main political parties. In addition, copies
were sent to the Metropolitan Police and to those government departments, regional health authorities, electricity, gas and water undertakings which might have an interest, as well as to local television and radio stations serving the Greater London area, and to a number of other interested persons and organisations.

4. The London boroughs and the City of London were requested to assist us in publicising the start of the review by inserting a notice for two successive weeks in local newspapers so as to give a wide coverage in the areas concerned.

5. A period of seven months from the date of our letter was allowed for all local authorities and any body or person interested in the review to send us their views on whether changes to the boundaries of Greater London authorities were desirable and, if so, what those changes should be and how they would serve the interests of effective and convenient local government, the criterion laid down in the 1972 Act.

OUR APPROACH TO THE REVIEW OF GREATER LONDON

6. We took the opportunity in our Report No 550, "People and Places" (April 1988), to explain in some detail the approach we take to our work and the factors which we take into consideration when conducting reviews, including the guidelines given to us by the Secretary of State (set out in Department of the Environment Circular 20/86 in the case of the reviews of London).

7. Subsequently, in July 1988, we issued a press notice, copies of which were sent to London boroughs, explaining the manner in which we proposed to conduct the review of London boundaries. In the notice we said that, from the evidence seen so far, this was unlikely to be the right time to advocate comprehensive change in the pattern of London government - although the notice listed a number of submissions for major changes to particular boundaries which had been made to the Commission, some of which the Commission had itself foreseen in "People and Places". These and other major changes to particular boundaries are being
considered by the Commission as it makes proposals for changes to the boundaries of London boroughs.

8. More recently, we have felt it appropriate to explain our approach to this, the first major review of London since London government reorganisation in 1965 and to offer our thoughts on the issues which have been raised by the representations made to us, and by our consideration of them. We have therefore published a general report, entitled "The Boundaries of Greater London and the London Boroughs" (Report No 627), which discusses a number of the wider London issues which have arisen during the course of our review of London.

THE BOUNDARIES COVERED BY THIS REPORT

9. This report concerns Hounslow's boundaries with Richmond and with Spelthorne in Surrey, and the boundaries of all three authorities where they meet in the vicinity of Kempton Park Racecourse. Our final proposals for changes to the boundaries between Hillingdon, Hounslow and Spelthorne in the vicinity of Heathrow Airport have been published separately (Report No 665). The remainder of Hounslow's boundary with Hillingdon, and its boundary with Ealing and Hammersmith and Fulham, will also be the subject of separate reports.

THE INITIAL SUBMISSIONS MADE TO US

10. In response to our letter of 1 April 1987, we received submissions from the London Boroughs of Hounslow and Richmond upon Thames, the Borough of Spelthorne and Surrey County Council. Richmond commented further on its boundary with Hounslow in its document entitled "The Strategic Importance of Richmond upon Thames", which it submitted to us in response to our review of the Royal Borough of Kingston upon Thames. We also received representations from two Members of Parliament, five interested organisations and 77 members of the public, as well as a petition containing 20 signatures and two sets of proforma letters, comprising 529 and 509 letters respectively.
11. We were also informed by the Gloucester Court Residents' Association that it would oppose any proposal to transfer Kew from Richmond to Hounslow. In the event, we received no suggestions for such a change and did not ourselves make any proposals for this area.

OUR DRAFT PROPOSALS LETTER AND THE RESPONSES RECEIVED

12. In addition to our letter of 1 April 1987, we published a further consultation letter, announcing our draft proposals and interim decision. This was published on 10 February 1992, and copies were sent to all the local authorities concerned and to all those who had made representations to us. We arranged for a notice to be published announcing our draft proposals and interim decision. In addition, Hounslow, Richmond, Spelthorne and Surrey County Council were asked to post copies of the notice at places where public notices are customarily displayed. They were also asked to place copies of our letter on deposit for inspection at their main offices for a period of eight weeks. Comments were invited by 6 April 1992.

13. In response to our draft proposals letter, we received responses from Hounslow, Richmond, Spelthorne and Surrey County Council. We also received comments from 117 members of the public, including one forwarded by Mr Toby Jessel MP, ten organisations, and three local councillors, and a petition bearing 50 signatures. The Metropolitan Police indicated that it had no comments on our draft proposals letter.

SUGGESTIONS FOR CHANGE AND OUR CONCLUSIONS

HOUNSLOW'S BOUNDARY WITH RICHMOND UPON THAMES

14. We received submissions from Mr Toby Jessel MP, the Twickenham Constituency Labour Party and 41 members of the public, opposing any suggestion of a transfer from Richmond to Hounslow of all, or any part of, the Whitton area which falls to the north of the A316 Chertsey Road. Many of these respondents were under the impression that Hounslow would be making such a recommendation to us but, in the event, it did not.
15. We considered that the existing boundary between Hounslow and Richmond appeared to contain a number of significant anomalies, and concluded that the use of the A316 in places should not be ruled out. However, neither Hounslow nor Richmond had suggested adopting the entire length of the Chertsey Road as a new boundary and, from their representations, we were aware of residents’ strong opposition to such a suggestion. We therefore decided against adopting the entire length of the road as the new boundary, and to consider individually each anomaly along the existing boundary.

INTERIM DECISION TO MAKE NO PROPOSALS

(a) Brentford Aits

16. The River Thames Society suggested that the Brentford Aits should be transferred to Hounslow, to facilitate planned development on the Brentford bank of the Thames.

17. We noted that Richmond had declared Brentford Aits to be areas of scientific interest and conservation, and recalled that it is not our practice to propose boundary changes which would have the effect of either stimulating or frustrating development. In the circumstances, we could see little justification for the Society’s suggestion. We therefore took an interim decision to make no proposals for change in the area of the Brentford Aits.

18. Richmond, the London Wildlife Trust and the Crane Park Project all supported our interim decision. Hounslow indicated that it did not oppose it. However, our interim decision was opposed by the River Thames Society, which reiterated its suggestion that Brentford Aits should be united in Hounslow with Lots Ait and Isleworth Ait, on the grounds that all these islands should be in a single Parliamentary constituency.

19. Richmond commented that confirmation of our interim decision would ensure the continuation of its Unitary Development Plan policies for the islands, which are designated as sites of nature interest, metropolitan open land, and land within a conservation area.
20. We reaffirmed our view that it would not be appropriate to propose a boundary change which might have the effect of either stimulating or frustrating development. Accordingly, in the absence of any further justification from the River Thames Society in support of its suggestion, we have decided to confirm our interim decision as final.

(b) Isleworth Ait

Draft Proposal

21. Hounslow, Richmond and the River Thames Society all suggested that Isleworth Ait, which is split by the existing boundary, should be united in Hounslow. Hounslow suggested realigning the boundary to the centre of the River Thames. However, Richmond suggested that the boundary should follow the River Crane inland, to the south of Isleworth Ait, to facilitate its suggestion for the transfer of the St Margaret's Estate to its authority (discussed in paragraphs 25-48 below).

22. We observed that the greater proportion of the Isleworth Ait is in Hounslow. We therefore agreed that the Ait should be united in that authority, and decided to adopt Richmond's suggestion as our draft proposal, to link with our draft proposal for St Margaret's.

Final Proposal

23. Hounslow, Richmond, the London Wildlife Trust, the Crane Park Project and the River Thames Society all supported our draft proposal. Richmond commented that the island is accessible only from Hounslow, at low tide, and is separated from Richmond by the main navigable channel of the river.

24. We received no other comments, and have decided to confirm our draft proposal as final.
25. Hounslow suggested a minor realignment to unite Boundary House, currently divided by the boundary, in Richmond. Richmond endorsed and recommended to us a suggestion submitted by the St Margaret's Estate Residents' Association, to transfer the St Margaret's Estate from Hounslow to Richmond by realigning the boundary to the River Crane. Both Richmond and the St Margaret's Estate Residents' Association expressed the view that the River Crane formed an obvious natural boundary in this area, delimiting a community linked by strong ties to Richmond, rather than to Hounslow.

26. The St Margaret's Estate Residents' Association informed us that it had carried out two surveys to canvass local residents' views on whether the estate should be transferred to Richmond. The first survey, of 879 residences, was conducted under the assumption that Hounslow intended to suggest realigning the boundary to the Chertsey Road, to unite the estate in Hounslow. The Association reported that, of 559 proforma letters returned, 511 had supported the estate's transfer to Richmond, while 18 had opposed it.

27. The second survey, of 742 residences, which excluded those properties in the estate already situated within Richmond, was conducted following the publication of Hounslow's suggestions to us for minor change to the boundary. The Association informed us that, of 509 proforma letters returned, 481 had supported the transfer of the estate to Richmond. 28 had opposed it.

28. In support of the suggestion that the St Margaret's Estate should be transferred to Richmond, we also received representations from Mr Jeremy Hanley MP and from 15 members of the public, together with a petition containing 20 signatures.

29. Hounslow opposed the suggestion submitted by Richmond and the St Margaret's Estate Residents' Association, on the grounds that it would sever existing community ties between the St
Margaret’s Estate and Isleworth. It also commented that the estate’s transfer to Richmond would sever existing links between its authority and the Maria Grey College of the West London Institute of Education, which would also be transferred to Richmond.

30. The Isleworth South Branch of the Brentford and Isleworth Labour Party and the Isleworth Civic Trust also opposed the estate’s transfer to Richmond. Two members of the public suggested that only part of the estate should be transferred, by aligning the boundary to Northcote Road, St Margaret’s Drive and Ranelagh Drive.

31. We took the view that Hounslow, Richmond and the St Margaret’s Estate Residents’ Association had all failed to advance particularly strong evidence for their respective cases. In particular, little information had been provided on local authority and associated service provision to the St Margaret’s area. However, it was clear that there was considerable support from residents for the suggestion that their community ties and affinities were more with the southern part of St Margaret’s, in Richmond, than with Hounslow. In view of this, we decided to adopt the suggestion submitted by Richmond and the St Margaret’s Estate Residents’ Association as our draft proposal.

Final Proposal

32. Our draft proposal was supported by Richmond, on the grounds that local residents were in favour, that the River Crane provides a natural boundary and that residents of the area have a clear community of interest with Richmond, looking to Richmond town centre for services. However, it was opposed by Hounslow, the Governors of the West London Institute, the Trustees of the Lancaster Grey Foundation and the Isleworth Civic Trust.

33. Hounslow said that our draft proposal would result in the loss to the authority of River Thames frontage, and that it would have a significant impact on the authority’s education service. It also pointed out that the West London Institute’s Maria Grey College would be transferred to Richmond, with the result that
the institute, which has another site elsewhere in Hounslow, would be forced to liaise with two education authorities and two planning authorities. It stated that the land and property of the site is vested in trustees, half of whom are Council representatives. Hounslow also listed the sites in the area proposed for transfer for which its Leisure Services Department has maintenance responsibility. As an alternative to our draft proposal, Hounslow suggested realigning the boundary along the River Thames and the A316 Chertsey Road.

34. The Governors of the West London Institute said that our draft proposal would transfer Gordon House Campus (referred to by Hounslow and Richmond as Maria Grey College) to Richmond, while Lancaster House campus would remain in Hounslow. This, the Governors commented, would mean that they could no longer deal with a single local authority over such matters as planning, further education funding, rates and taxes. They emphasised the constructive relationship which the Institute has with Hounslow, and stated that three Hounslow Council Trustees serve on the Lancaster Grey Foundation Trust, upon which the Institute is now based. The Governors supported Hounslow's alternative suggestion to realign the boundary along the Chertsey Road.

35. The Trustees of the Lancaster Grey Foundation explained that the Foundation Trust had been established to facilitate the operation of the West London Institute, a corporate body which had been created in 1976 to promote further and higher education. They informed us that three of the six trustees are appointed by Hounslow and the remainder by the British Foreign School Society. All six trustees were said to be equally opposed to our draft proposal.

36. Richmond took the view that as West London Institute is not local authority administered, the location of Maria Grey College is of less relevance. Indeed, it considered that the College's transfer would strengthen the existing relationship between its Department of Creative and Performing Arts and Richmond's Arts Development Strategy, and would involve the Institute more closely in the local education libraries scheme.
37. Isleworth Civic Trust commented that Hounslow retains reversionary rights to the land at Maria Grey College and, as part of the arrangement between the Council and the Institute, owns and maintains the Kilmorey Mausoleum on St Margaret's Road. The Trust argued that our draft proposal was indefensible, conflicting with the area's history and existing service provision. It commented that only a small part of the area proposed for transfer forms the St Margaret's Estate (the area around St Peter's Road, St Margaret's Drive, Ailsa Road and St George's), and that the greater number of houses to the north of the Chertsey Road are actually in the Gordon Estate.

38. The Trust also said that the grounds of Gordon House and St Margaret's House have always been part of the historic riverside settlement of Old Isleworth, and pre-date the development of Twickenham. It explained that the river frontage in this area forms part of Hounslow's Isleworth Conservation Area, which would be split by our draft proposal.

39. The Trust disputed the view that the River Crane forms a natural boundary in this area. It believed that the river unites rather than divides riparian residents, and pointed out that the Tidal Crane Association has members on both banks. The Trust was also concerned that, in future, it would have to negotiate and consult with two planning authorities, as would the National Rivers Authority, whose planned five year works programme for the tidal section of the River Crane would be similarly inconvenienced. Isleworth Civic Trust supported Hounslow's suggestion to realign the boundary along the A316 Chertsey Road.

40. The River Thames Society suggested realigning the boundary along Richmond Lock, St Margaret's Drive and St Margaret's Road, thereby transferring to Richmond only the area delineated by the Isleworth Civic Trust as the St Margaret's Estate.

41. 67 letters were received from members of the public supporting our draft proposal, and 42 letters and a petition bearing 50 signatures from residents who opposed Hounslow's suggestion for a realignment to the A316 Chertsey Road.
42. Our draft proposal was opposed by only two residents. One commented that she was content with the services provided by Hounslow, and supported the use of the A316 Chertsey Road as the boundary, which she considered to be a more obvious physical feature than the River Crane. The other commented that the natural boundary in this area should be the River Thames and suggested the formation of two new boroughs: one comprising Richmond, Mortlake, Sheen, Barnes and Putney; and another comprising Twickenham, Whitton and Isleworth.

43. The St Margaret’s Estate Residents’ Association supported our draft proposal and referred to the surveys it had conducted earlier, (referred to in paragraph 26 above), one of which had found that nearly two-thirds of residents surveyed supported a transfer to Richmond. It commented that, on the basis of the survey findings, Hounslow’s suggestion did not appear to reflect the views of the residents concerned.

44. Other respondents commented that their links were with Richmond, whose facilities were within walking distance, in contrast to Hounslow’s, which were some distance away. They said that they used shopping, entertainment and leisure facilities in Richmond and that their children attended Richmond schools. They considered their natural affinities to be with Richmond and Twickenham, and did not see the Chertsey Road as a barrier to these ties. One resident complained about the lack of any control in Kilmorey Gardens and Kilmorey Road of traffic generated by Maria Grey College.

45. We had received no evidence to suggest that the existing boundary in this area adversely affected the operation of local government services. Nevertheless, from the widespread support for our draft proposal, it was clear to us that it did not reflect either the wishes or the affinities of a large number of people in the St Margaret’s area, and divided what many respondents considered to be a single community. Residents had demonstrated strong affinities with Richmond, stating that they use facilities provided in Twickenham and Richmond town centre, which are nearer and more readily accessible than those provided in Hounslow.
46. We observed that our draft proposal would transfer the West London Institute’s Gordon House Campus to Richmond, but leave the rest of the institute in Hounslow. However, the Institute is no longer funded by Hounslow, and it is far from uncommon for such educational establishments to have facilities in two, or even more, authorities. We therefore concluded that the division of the West London Institute between the two authorities should not cause insurmountable difficulties in its administration or management. While Hounslow has reversion rights over the land at Gordon House Campus, and owns Kilmorey Mausoleum, it is far from unusual for a local authority to own or have interests in property outside its administrative area.

47. It had been drawn to our attention that our draft proposal would split a Hounslow conservation area. However, we saw no reason to suppose that Richmond would be unable properly to maintain any part of the conservation area transferred to its authority.

48. In the circumstances, and especially given the strong support from local residents for our draft proposal, we have decided to confirm it as final.

(d) The St Margaret’s Estate - Electoral Consequences

49. We are required to give consideration to the electoral consequences of our draft proposals, and were aware that our draft proposal for the St Margaret’s Estate would, if implemented, necessitate a number of significant changes in electoral arrangements.

50. Our draft proposal to unite the St Margaret’s Estate in Richmond would transfer 1,696 electors from Hounslow to Richmond’s East Twickenham Ward, which would result in a poor level of representation in that ward. Mindful of the convention established in our Report No. 6 that borough wards should have a maximum of three councillors, there appeared to us to be no scope for redistributing local councillors to correct this imbalance, given that East Twickenham Ward already has three councillors. There also appeared to be no scope for transferring
electors out of East Twickenham Ward, or for merging it with another ward in Richmond.

51. We therefore decided to publish our draft proposal to unite the St Margaret’s Estate in Richmond’s East Twickenham Ward, but to make no proposal for the redistribution of local councillors between Hounslow and Richmond.

52. Richmond expressed concern that all electors in the St Margaret’s area would be transferred to its East Twickenham Ward, creating an electorate of 8,303 (based on the 1992/93 electoral register). With the convention that wards should have a maximum of three councillors, Richmond believed that, compared with other wards in the Borough, the enlarged East Twickenham Ward electorate would be disadvantaged in its level of councillor representation.

53. The Council therefore suggested reverting to the pre-1978 ward boundary between its Central Twickenham and East Twickenham wards, thereby transferring 780 electors to Central Twickenham. It also suggested that the number of councillors representing Central Twickenham should be increased from two to three.

54. A local resident, in supporting our draft proposal to unite St Margaret’s in Richmond, pointed out that fluctuations in numbers of electors of this magnitude are not an unusual occurrence with new residential developments.

55. We accepted that Richmond’s suggestion would improve the standard of representation in East Twickenham ward. However, we felt that the effect of our draft proposal was acceptable in the short term and concluded that the need for any changes between the two wards would be more satisfactorily addressed in the context of a future mandatory electoral review. We have therefore decided to confirm as final our decision not to propose any changes to Richmond’s electoral arrangements as a consequence of our draft proposal for the St Margaret’s Estate.
Draft Proposal

56. We received three separate suggestions from Hounslow for changes to the boundary in this area:

   a. that the boundary currently following the rear fence lines of properties fronting the south side of Argyle Avenue, Park Avenue and Whitton Dene should be realigned to the south side of these roads;

   b. that Old Manor Drive and Whitton Manor Road should be united in Richmond; and

   c. that an area of open land, used as a car park for Twickenham Rugby Football Ground, should be united with the Rugby Ground in Richmond, by aligning the boundary to the Duke of Northumberland's River, and the south side of Whitton Dene and the east side of Rugby Road.

57. Richmond suggested a more extensive realignment of the boundary to follow the south side of Argyle Avenue, Park Avenue and Whitton Dene for its whole length, and the west side of Rugby Road. This would transfer some 360 properties from Hounslow to Richmond, including those between Whitton Dene and the Kneller Hall Royal Military School of Music. The Council commented that such a realignment would produce a clearer and more durable boundary. However, Hounslow opposed Richmond's suggestion, on the grounds that it would have significant implications for its authority.

58. We considered Richmond's suggested realignment in this area, but took the view that, south of Whitton Dene, the Kneller Hall Royal Military School of Music and its environs created a significant natural break in the pattern of development. In view of this, we did not consider that a case had been made for the transfer to Richmond of the properties to the north of Kneller Hall.
59. We considered that Hounslow's suggested realignments adequately addressed the relatively minor boundary anomalies in this area, and decided to adopt them as our draft proposals. However, we also noted that the existing boundary made poor use of ground detail to the north of Kneller Hall, and divided a number of properties on the Twickenham Trading Estate. We therefore decided to adopt realignments to improve the boundary to the north of Kneller Hall, and to unite the Trading Estate in Hounslow.

Final Proposal

60. Our draft proposal was supported by Hounslow and by a local resident. Richmond supported most of it, but expressed the view that its original suggestion, to realign the boundary to the south side of Whitton Dene in the vicinity of Kneller Hall, would more adequately resolve the anomalies in the existing boundary. However, Richmond pointed out that our draft proposal had failed to rectify an irregularity in the existing boundary to the rear of Nos 67-77 Kneller Gardens, and suggested that, should we be minded to confirm it, our draft proposal should be modified to follow the rear fences of Nos 67-77 Kneller Gardens. The Council also suggested that the existing boundary be realigned where it crosses a track to the east of No 81 Kneller Gardens.

61. We reaffirmed our view that the Kneller Hall Royal School of Music and its environs create a natural break in the pattern of development between Whitton Dene and Richmond to the south, and considered that Richmond had provided no additional justification in support of its suggestion for Whitton Dene. However, we agreed with the Council that our draft proposal for the rear of properties in Kneller Gardens could be improved. We therefore decided to confirm our draft proposal as final, subject to the minor modifications suggested by Richmond.
62. Hounslow suggested that the Mill Farm Works industrial site should be united in Hounslow, in order to facilitate its redevelopment. Richmond opposed Hounslow's suggestion, commenting that the site was inaccessible from the Hounslow side of the boundary.

63. We agreed with Richmond that the industrial site appeared to be inaccessible from Hounslow. Nevertheless, we concluded that its division by the existing boundary was not in the interests of effective and convenient local government. We therefore decided to adopt as our draft proposal an alignment to transfer the Mill Farm Works industrial site to Richmond. In order to be consistent with our draft proposal for Crane Park and the River Crane, detailed below, we also concluded that our draft proposal for the industrial site should follow the River Crane for part of its length.

Final Proposal

64. Richmond supported our draft proposal, on the grounds that access to the site is through Richmond and that planning functions would be facilitated by uniting the site in its authority. It was also supported by the Crane Park Project of the London Wildlife Trust.

65. Our draft proposal was opposed by Hounslow. The Council accepted that there is no access to the site from its authority. However, it commented that it did not wish to lose potential industrial development land, and said that if our draft proposal were confirmed, its strategy for the former Feltham Marshalling Yard area, which is designated as a site of metropolitan importance for nature conservation, could be undermined by the change in the proportion of land available for Green Belt and industrial uses. The Council suggested realigning the boundary along Hanworth Road to unite the site in Hounslow and to provide access to it.
66. We considered that Hounslow's suggestion would transfer a larger area than was justified to unite the industrial site in its area. Accordingly, as the only access to the site is from Richmond, and it is separated from Hounslow by open land, we have decided to confirm our draft proposal as final.

(g) Crane Park and the River Crane

Draft Proposal

67. Hounslow suggested that the boundary should be realigned to the present course of the River Crane. Richmond commented that the local administration of Crane Park would benefit if the Park were to be united in its authority. This was opposed by Hounslow, on the grounds that Crane Park comprises two discrete areas of open land, divided by the River Crane.

68. We agreed with Hounslow that the current division of the park did not appear to cause any difficulties in its administration or management, and considered that, on the grounds of effective and convenient local government, there appeared to be no need for Crane Park to be united in one authority. We therefore decided to adopt Hounslow's suggestion as our draft proposal, to realign the boundary to follow the new course of the River Crane.

Final Proposal

69. Hounslow supported our draft proposal. However, it was opposed by Richmond, by three local councillors, the Crane Park Project, the London Wildlife Trust, and by Heathfield Infant and Junior Schools.

70. Richmond resubmitted its original suggestion to unite the whole of Crane Park in its area. It suggested that if we did not adopt this suggestion, and were minded to confirm our draft proposal, then it should be modified in the following order of preference:
(i) to retain all the islands in Richmond; or 
(ii) to retain the largest island, a nature reserve, in Richmond; or 
(iii) to unite the sluice and the Shot Tower in one authority.

71. Richmond commented that the River Crane Valley is designated in the Richmond Unitary Development Plan as metropolitan open space, a site of local interest, public open space and an area of recreational opportunity. The Council believed that it should be united in one authority to ensure a consistent approach to its management.

72. The Council also informed us that Crane Park has historic and physical links with its borough. The largest island is now a nature reserve, leased to the London Wildlife Trust’s Crane Park Project for 20 years. The shot tower on the north bank forms part of the project’s centre, and the main access to the island for visiting schools and other parties is from Richmond. The Council did not believe that it would be in the interests of effective and convenient local government to separate the nature reserve from Richmond, which would be the effect of our draft proposal.

73. Three Richmond councillors emphasised the links that the project has with Richmond schools. They mentioned facilities provided for visitors, such as a new footbridge to the island, and facilities for disabled visitors. They pointed out that there are no facilities on the Hounslow bank, and no footbridge. The councillors suggested realigning the boundary to skirt the Hounslow side of the river, thereby uniting the nature reserve in Richmond and transferring two smaller islands to that borough.

74. The London Wildlife Trust explained that the area has been declared a Local Nature Reserve by both Richmond and Hounslow, but that the full-time Warden’s post is funded by Richmond. The Wildlife Trust was concerned about possible legal, administrative and financial difficulties which could ensue if the island were transferred to Hounslow, as the reserve itself would be in Hounslow and possibly in Hounslow’s ownership, while the Trust’s
office, classroom and exhibition centre would remain in Richmond.

75. The London Wildlife Trust's Crane Park Project generally supported our draft proposal for Crane Park. However, it commented that the mapping we had used to illustrate our draft proposal had failed to show the new course of the River Crane in the area of Crane Park island and the small islands to its north west. The Project suggested that our draft proposal be modified by realigning the boundary to the south of the small islands and to the southern channel around the nature reserve, thereby uniting it in Richmond. It said that the channel to the north of the islands dries out when the river is low.

76. The Headteachers of Heathfield Junior and Infant Schools emphasised the close links between the Crane Park Project and local Richmond schools. The Headteacher of Heathfield Infants School was concerned that the shot tower and the island should both be retained in Richmond, and commented that the Wildlife Centre uses the school as a base, and is supported by Richmond.

77. We reaffirmed our view that there was no justification for uniting the whole of Crane Park in Richmond. However, in the light of the representations received, we concluded that, as the nature reserve's links are entirely with Richmond, both in terms of access and funding, it would be in the interests of effective and convenient local government for it to remain in that authority's area. In the light of the Crane Park Project's comment that part of our draft proposal follows a channel which is said to dry up, we considered that a realignment to the main channel to the south of these islands, as suggested by the Crane Park Project, would be more satisfactory.

78. We have therefore decided to adopt as our final proposal that part of our draft proposal to the north-west of Crane Park islands and, between the northern extent of the islands and the existing boundary, part of the alignment suggested by the Crane Park Project. We recognise that our final proposal leaves a short stretch of defaced boundary in this area. However, we are satisfied that this will have no significant effect in terms of effective and convenient local government.
79. Richmond suggested an extensive realignment which would have the effect of transferring an area largely comprising the Butts Farm Estate to its authority. The Council expressed the view that the existing boundary in this area is anomalous in that considerable numbers of Richmond-owned housing units, situated on the Butts Farm Estate, were in Hounslow. The Council expressed the view that the location of this out-of-borough housing militated against the effective and efficient provision of local services to its tenants.

80. Hounslow opposed Richmond’s suggestion, on the grounds that the Butts Farm Estate is isolated from Richmond by the A316 Great Chertsey Road and by Fulwell Park. It also commented that many of the residents in the area claimed by Richmond were not Richmond council tenants, but other local residents, linked by community ties to Hanworth, in Hounslow. Hounslow expressed the view that the transfer to Richmond of the Butts Farm Estate, together with the Crane Junior and Infant Schools, could disrupt the provision of primary school education in the Hanworth area of Hounslow. It also commented that any difficulties concerning the estate, resulting from Richmond tenants being located in Hounslow, could be addressed by the introduction of a tenant participation system in the area.

81. Richmond’s suggestion was also opposed by Mr Toby Jessel MP and Mr Patrick Ground QC, formerly Member of Parliament for Feltham and Heston.

82. The greater part of the Butts Farm Estate is separated from Richmond by the Great Chertsey Road and Crane Park, both of which we considered created obstacles to movement. We therefore agreed with Hounslow that Richmond had provided insufficient justification for the transfer of the estate in its entirety. However, we observed that, just as the Great Chertsey Road and Crane Park separated Richmond from the larger, north western part of the estate, the former created a similar obstacle to access
from Hounslow to the south eastern part of the estate. We therefore decided to adopt as our draft proposal for this area a realignment along the south eastern side of the Great Chertsey Road and along the northern side of Uxbridge Road, thereby transferring the southern part of the Butts Farm Estate to Richmond.

Final Proposal

83. Hounslow opposed our draft proposal and suggested retaining the existing boundary. Richmond supported our draft proposal, but reiterated its original suggestion that the whole of the estate should be united in its authority.

84. Hounslow expressed the view that we had grossly exaggerated the importance of the Great Chertsey Road as a barrier. It asserted that future links, such as a footbridge between the two parts of the estate, would be more difficult to implement if the southern part of the Butts Farm Estate were transferred to Richmond.

85. The Council referred to a survey it had carried out of approximately 250 residences in the southern part of the estate, south of the Great Chertsey Road. Of the 47 replies received, 20 residents had expressed a wish to remain in Hounslow, while 27 supported a transfer to Richmond. On the basis of this response, Hounslow considered that local opinion was divided and that, consequently, there was insufficient justification for our draft proposal.

86. Richmond’s view was that our draft proposal did not resolve the problem north of the Great Chertsey Road, where Richmond-owned properties would still be located in a different borough. It believed that this situation would give rise to confusion over service provision, and expressed the view that it was not in the interests of effective and convenient local government. The Council considered its tenants on the Butts Farm Estate to be disadvantaged, as they have no representation on the authority which is responsible for the management and maintenance of their dwellings.
87. Richmond provided details of improvements to the estate, both completed and planned, involving tenant participation. It also compared unfavourably the facilities provided by Hounslow for tenants on the estate with those which its Council provided for tenants in Richmond.

88. The Council also informed us of the results of a survey it had carried out among residents on both sides of the Chertsey Road, asking if they would favour a transfer to Richmond. Of the 44% of residents who replied, 76% supported a transfer to Richmond. Richmond also enclosed letters from four residents supporting its suggestion.

89. From the evidence submitted by Richmond, we considered that there appeared to be public support for our draft proposal south of the A316 Great Chertsey Road. Although the majority of those who replied to Richmond’s survey supported the transfer of the area north of the A316 Great Chertsey Road, we concluded that Richmond had provided no new evidence to justify the transfer of such a large area from Hounslow. In any event, it is far from unique for London local authorities to have out-of-borough housing, particularly following the transfer to London boroughs in the early 1980s of large parts of the former Greater London Council’s housing stock. We considered that if Richmond felt that its tenants were being seriously disadvantaged by the split in responsibilities between it and Hounslow, the London Government Act 1963 provided adequate remedy, for example, by making provision for the transfer between authorities of land held for housing purposes.

90. Accordingly, notwithstanding Hounslow’s objection, we have reaffirmed our view that the A316 Great Chertsey Road would provide the clearest boundary in this area, and have decided to confirm our draft proposal as final.
(i) St Richard of Chichester Church

Draft Proposal

91. St Richard of Chichester Church is situated on the Richmond side of the boundary, but is accessible only from Hounslow. While we had received no suggestions for boundary changes in this area, we concluded that it would be in the interests of effective and convenient local government for the church to be in the same authority as its access. We therefore decided to adopt as our draft proposal an alignment to transfer the church to Hounslow.

Final Proposal

92. Both Hounslow and Richmond supported our draft proposal. Richmond commented that the Church serves the parish of Hanworth (in Hounslow) and agreed that it is not accessible from its authority.

93. We received no other comments on our draft proposal, and have decided to confirm it as final.

HOUNSLOW’S BOUNDARY WITH SPELTHORNE IN SURREY

(a) Boundary south of Heathrow Airport

Final Proposal

94. Both Spelthorne and Surrey County Council pointed out to us that our draft proposals letter had omitted to address anomalies along a stretch of the Hounslow/Spelthorne boundary, between Heathrow Airport and the Ashford to Waterloo railway line to the south. These had previously been subsumed within our original draft proposals for local authority boundaries in the vicinity of Heathrow, which were later withdrawn and further draft proposals issued.

95. Surrey commented that the existing boundary splits an oil depot and other areas of developed and open land to the south of Heathrow. Both Spelthorne and the County Council suggested
reallocing the boundary along the east side of the A30 and Clockhouse Lane, on the grounds that this would provide a firm physical boundary, which would rectify the anomalies. Hounslow, in its original submission to us, had suggested unifying a petroleum storage depot in its area.

96. We considered that Hounslow's suggestion would split the petroleum depot from the adjoining industrial site to the west. We also considered that the suggestions from Spelthorne and Surrey appeared to be more extensive than was strictly necessary in order to resolve the boundary anomalies in this area, and observed that the area to the south of the A30 Staines roundabout, in Hounslow, appeared to be the subject of redevelopment.

97. We took the view that it would be in the interests of effective and convenient local government to unite the whole of the industrial site in one authority, Hounslow, as we had previously proposed in the context of our review of local authority boundaries in the vicinity of Heathrow. Accordingly, we have decided to adopt as our final proposal a realignment of the boundary to the southern and western curtilage of the industrial site.

(b) Bridge Farm Smallholdings

Draft Proposal

98. Surrey County Council and Spelthorne both suggested the transfer of land situated to the south of the BR Ashford to Waterloo railway line to Surrey, to reflect the County Council’s ownership of the land. We considered that the suggestion appeared to be in the interests of effective and convenient local government, and decided to adopt it as our draft proposal.
Final Proposal

99. Hounslow, Surrey and Spelthorne all supported our draft proposal. We received no other representations, and have decided to confirm our draft proposal as final.

(c) BP Research Centre

Draft Proposal

100. The existing boundary divides the Research Centre in Spelthorne from its car park in Hounslow. Hounslow, Surrey County Council and Spelthorne all suggested uniting the facility in Spelthorne. We agreed that the Councils’ suggestions would rectify this boundary anomaly, and decided to adopt it as our draft proposal.

Final Proposal

101. Hounslow, Surrey and Spelthorne all supported our draft proposal. We received no other representations, and have decided to confirm our draft proposal as final.

(d) Felthamhill Allotments

Draft Proposal

102. Hounslow, Surrey County Council and Spelthorne all suggested a minor change to the boundary, to align it more closely to ground detail. We agreed that the existing boundary is poorly defined in this area, and decided to adopt the Councils’ suggestions as our draft proposal.

Final Proposal

103. Hounslow, Surrey and Spelthorne all supported our draft proposal. We received no other representations, and have decided to confirm our draft proposal as final.
Draft Proposal

104. Hounslow suggested a minor realignment to transfer a works site on Groveley Road to Spelthorne, and to rationalise the existing boundary, which arbitrarily divides Staines Rugby Club Ground and some playing fields. Surrey County Council and Spelthorne suggested a similar realignment in relation to the rugby club.

105. We considered that Hounslow’s suggestion failed to address the current division of the rugby club ground. By contrast, the suggestions submitted by Surrey and Spelthorne appeared to provide a clearer and more durable boundary. We therefore decided to adopt those Councils’ suggestion as our draft proposal, subject to minor modifications to make better use of ground detail.

Final Proposal

106. Our draft proposal was supported by Surrey, but was opposed by Hounslow and Spelthorne. Hounslow commented that our draft proposal would result in the loss of green belt land to its authority.

107. Spelthorne opposed our draft proposal on the grounds that it would unite Staines Rugby Club in Hounslow. The Council commented that approximately 65% of members of the club live in its Borough, and said that the Council has strong links with the club. It recently gave the club a grant towards the cost of equipment; the Council’s officers advise on the maintenance of the club’s pitches; the club participates in the Council’s twinning link with Melun, in France; and that it is an active member of the Spelthorne Sports Council. As an alternative to our draft proposal, Spelthorne suggested realigning the boundary along the east side of Groveley Road, the south side of Felthamhill Road and the east side of the rugby ground to join our draft proposal, thereby uniting the rugby club ground in its authority.
108. Our draft proposal was also opposed by the Staines Rugby Football Club, and by three members of the public. The club commented that it had moved to its present ground in 1963, from a ground in Staines and had, to some extent, lost some of its association with Staines. The club considered that, in view of its origins and associations, it would be more appropriate for its grounds to be united in Spelthorne. Similar comments were made by the three members of the public.

109. The larger part of the rugby club’s grounds are in Hounslow, and its sole access is from that authority. We acknowledged the links and associations the club is said to have with Spelthorne. However, we considered the Council’s suggested modification to our draft proposal would transfer a larger area to its authority than appeared justified in the circumstances. Many authorities have links with sports clubs outside their areas, and we could see no reason to suppose that the links between the Staines Rugby Football Club and Spelthorne need be unduly affected by our draft proposal. We have therefore decided to confirm it as final.

 THE BOUNDARY BETWEEN HOUNSLOW, RICHMOND AND SPELTHORNE IN THE VICINITY OF KEMPTON PARK

Draft Proposal

110. The existing boundary divides Kempton Park Race Course, and fails to follow ground detail where the boundaries of Hounslow, Richmond and Spelthorne converge. Hounslow suggested realigning the Hounslow/Spelthorne boundary to the north side of the BR Shepperton to Waterloo railway line, while Surrey County Council and Spelthorne both suggested that it should follow the south side of the railway line. Richmond suggested that its boundary with Spelthorne should follow the south side of the railway line.

111. We considered that Hounslow’s suggestion to use the north side of the railway appeared to provide the greatest improvement to the Hounslow/Spelthorne boundary in this area. We also considered that the north side of the railway would form the basis of a clear and durable boundary between Richmond and
Spelthorne. We therefore decided to adopt as our draft proposal a realignment of Spelthorne's boundary with Hounslow and Richmond to follow the north side of the railway line at Kempton Park.

112. We recognised that such a realignment would necessitate some consequential modification to the Hounslow/Richmond boundary. We therefore also decided to adopt as our draft proposal for this area, a realignment of the Hounslow/Richmond boundary, thereby linking our draft proposal for Spelthorne's boundary with Hounslow and Richmond to the existing boundary.

Final Proposal

113. Richmond, Spelthorne and Surrey County Council all supported our draft proposal. However, it was opposed by Hounslow, on the grounds that the land to the south of the Shepperton to Waterloo railway line is, together with a larger area to the north of the existing boundary, part of the Kempton Waterworks site, an important wildlife site, under consideration as an Site of Special Scientific Interest and, with other wetlands in the area, a site recognised by the Ramsar Convention as important for wetland and waterfowl. The Council commented that the whole site is in the ownership of Thames Water, and expressed the view that it should be kept in one ownership and in one planning authority.

114. Hounslow suggested that if the railway were to be used as a boundary, our draft proposal should be extended eastward to unite a recreation ground and allotment gardens in Hounslow. It further suggested that the areas of Half Moon Covert and Half Moon Reservoir, south of the railway should also be transferred to its authority, to represent a more complete environmental package of land.

115. We made enquiries of Thames Water Utilities concerning its landholding in the vicinity of Kempton Park, and were informed that its interests do not extend south of the railway line. We considered that, in terms of nature conservation, it was not essential to keep the area united in one authority, as other associated wildlife sites are already situated in Spelthorne.
We also considered that the allotment gardens and recreation grounds which Hounslow sought to have transferred to its area relate to the housing to the east, in Richmond.

116. Accordingly, notwithstanding Hounslow's comments, we have reaffirmed our view that the Shepperton to Waterloo railway line would provide the clearest boundary in this area, and have decided to confirm our draft proposal as final.

ELECTORAL CONSEQUENCES

117. Our final proposals will have limited electoral consequences for the local authorities affected by this review. The details of our proposals for changes in electoral arrangements are described in Annex B to this report.

CONCLUSIONS

118. We believe that our final proposals, which are summarised in Annex C to this report, are in the interests of effective and convenient local government and we commend them to you accordingly.

PUBLICATION

119. A separate letter is being sent to the London Boroughs of Hounslow and Richmond upon Thames, the Borough of Spelthorne and Surrey County Council asking them to deposit copies of this report at their main offices for inspection for a period of six months. They are also being asked to put notices to that effect on public notice boards. Arrangements have been made for similar notices to be inserted in the local press. The text of the notice will explain that the Commission has fulfilled its statutory role in this matter and that it now falls to you to make an Order implementing the proposals, if you think fit, though not earlier than six weeks from the date our final proposals are submitted to you. Copies of this report, with the maps attached at Annex A illustrating the proposed changes, are being sent to all those who received our draft proposals letter.
of 10 February 1992, and to those who made written representations to us.
LOCAL GOVERNMENT BOUNDARY COMMISSION FOR ENGLAND

REVIEWS OF GREATER LONDON, THE LONDON BOROUGHS AND THE CITY OF LONDON

HOUNSLOW LB

AFFECTING RICHMOND UPON THAMES LB AND SPELTHORNE BOROUGH IN SURREY COUNTY

FINAL PROPOSALS

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<th>Proposed Boundary</th>
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Produced by Ordnance Survey for the
Local Government Boundary Commission for England
RICHMOND UPON THAMES LB

HOUNSLOW LB

Area B

Area C

Area D

Area E

See MAP 6

Map 5b
### CONSEQUENTIAL CHANGES

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### SUMMARY OF PROPOSED BOUNDARY CHANGES

#### Boundary between Hounslow and Richmond

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<tr>
<td>Isleworth Ait</td>
<td>Realignment to unite Isleworth Ait in Hounslow.</td>
<td>Paragraphs 23-24, Map 1</td>
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<td>The St Margaret's Estate</td>
<td>Realignment to the River Crane to unite the St Margarets Estate in Richmond.</td>
<td>Paragraphs 32-48, Map 1</td>
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<td>Argyle Avenue, Park Avenue, Whitton Dene and Rugby Road</td>
<td>Realignment to the south sides of Argyle Avenue, Park Avenue and Whitton Dene (part), to unite Old Manor Drive and Whitton Manor Road in Richmond, to tie the boundary to firm ground detail north of Kneller Hall, and to unite the car park of Twickenham Rugby Football Ground and Twickenham Trading Estate in Richmond.</td>
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<td>Realignment to unite the industrial site in Richmond.</td>
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<td>Realignment to the River Crane.</td>
<td>Paragraphs 69-78, Maps 5a and 5b</td>
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<td>Butts Farm Estate</td>
<td>Realignment to the south eastern side of the A316 Great Chertsey Road.</td>
<td>Paragraphs 83-90, Map 6</td>
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<td>St Richard of Chichester Church</td>
<td>Realignment to unite the church in Hounslow.</td>
<td>Paragraphs 92-93, Map 7</td>
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#### Boundary between Hounslow and Spelthorne in Surrey

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<td>Realignment to unite an industrial site in Hounslow.</td>
<td>Paragraphs 94-97, Map 8</td>
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<tr>
<td>Bridge Farm Smallholdings</td>
<td>Realignment to unite the smallholdings in Spelthorne.</td>
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BP Research Centre
Realignment to unite the Research Centre in Spelthorne. Paragraph 101 Map 10

Felthamhill Allotments
Realignment to tie the boundary to firm ground detail. Paragraph 103 Map 10

Felthamhill Sports Grounds
Realignment to unite Staines Rugby Club in Hounslow and playing fields in Spelthorne. Paragraphs 106-109 Map 11

The Boundary between Hounslow, Richmond and Spelthorne in the vicinity of Kempton Park

Kempton Park
Realignment to the north of the BR Shepperton to Waterloo railway line. Paragraphs 113-116 Map 12