

Application 17/3127/Tel - objection by FORCE

This objection is being submitted by Friends of the River Crane Environment (FORCE) in response to the application 17/3127/Tel for a 15 metre high telecoms mast and associated infrastructure on the Craneford East Playing Field and adjacent to the Marsh Farm Lane public footpath.

FORCE is a charity, set up in 2003, with around 500 mostly local members and a remit to protect and enhance the community and environmental value of the River Crane corridor. This proposal is of interest to FORCE as it is sited within the open spaces of the lower Crane valley corridor and only some 40 metres from the river itself.

In April 2017 FORCE responded to a pre-application notice posted local to the proposed site and we note that this is acknowledged in section 1.4 of the application report. However, we also note that the nature of the concerns we expressed are not referenced in the report and neither have any of these concerns been materially addressed in this application. Our original response of 6th April is attached to this document as well as the response from Harlequin of 7th April 2017.

There are several points we would like to make regarding the process by which this application has been undertaken before we move to its substance:

1. FORCE received no further communication from Harlequin Group or Richmond College following the e-mail of 7th April (coped below), which specifically promises a further response
2. FORCE received no notification from Harlequin Group or the college regarding this planning application – despite being a resondee to the pre application in April, as acknowledged in the planning application report
3. As of 19th September 2017, some 32 days after the application was received and 19 days after neighbour notification is recorded on the council's web-site as having started, there were no public notices in the vicinity of the planning application site to inform the public of this application
4. Note that this proposal was at no time mentioned during several years of community liaison meetings which FORCE attended up until recently in the run up to the major expansion and redevelopment scheme on the college site. Note further that the college has a commitment to continue these liaison meetings through the construction period and this has not been upheld – with no meeting of the group held since October 2016 and no Community Liaison Officer in post

For these reasons FORCE does not consider this planning application has been undertaken in conformity with planning regulations, specifically as there has not been appropriate opportunity for those interested and/or affected by the application to register their responses to it.

The application is for a 15 metre high telecom tower with three ground based cabinets. The tower is located:

1. Near the centre of the two areas of public open space (Craneford East and Craneford West Fields) comprising key areas of Metropolitan Open Land adjacent to the River Crane and within the River Crane corridor
2. Immediately adjacent to Marsh Farm Lane – a pathway that is a key part of the lower Crane path network, having been in place since at least the early 1800's and linking the Crane corridor to the college and the A316 to the north and Twickenham Green and the town centre to the south. With the imminent opening of the pathway linking Twickenham Station through this site to Crane Park, and the planned opening of the new secondary school and college on the Richmond College site, then the importance and use of this route will significantly increase

3. The current width of the Marsh Farm Lane pathway is 1.7 metres and would be some 2 metres away from the proposed mast and cabinets. However, this pathway is due to be widened to 3 metres as part of the college re-development scheme, and as acknowledged in the site plan, to accommodate the increased usage envisaged following the new college developments. Following this widening the path would directly abutt the proposed EE demised area and be within a metre of the associated infrastructure and mast, according to the site layout drawing

FORCE objects to this application on the following grounds:

Justification

1. The proposal is to replace the existing mast(s) on top of the college buildings whilst these are re-built. However, this proposal appears to be for a permanent installation whilst only a temporary one would be needed for this purpose
2. The proposal claims that locations adjacent to the existing mast(s) are not appropriate due to not providing sufficient coverage. However presumably if the new mast were built to the same or similar height as the existing mast(s) then this would perform the same service as at present
3. There are at least two existing telecom masts within a few hundred metres of the existing site. The applicant is obliged to seek the use of these alternative sites as a first option and there is insufficient evidence that this avenue has been fully investigated

Impact

1. The site location is in the middle of the River Crane corridor and directly adjacent to a well-used public pathway. It is also directly adjacent to a large and mature tree. There will therefore be significant and avoidable visual and aesthetic impact upon:
 - a. The sense of open-ness and associated aesthetic and amenity value of the River Crane corridor and MOL when walking along Marsh Farm Lane
 - b. The sense of open-ness and associated aesthetic and amenity value of the River Crane corridor and MOL when visiting the MOL of the Craneford West Field and the proposed surrounding public open space around the Craneford East (college) Field
 - c. The sense of open-ness and associated aesthetic and amenity value of the River Crane corridor and MOL when viewed from the houses along Craneford Way
2. Marsh Farm Lane is already well used by college students, rugby crowds going to and from RFU and Harlequins and the local community going to and from Twickenham – by pedestrians and cyclists. When the new pathway opens up along the river linking this route with Twickenham station then this usage is forecast to increase considerably. The proposed infrastructure would be directly adjacent to this pathway and therefore likely to be an impediment to the public use of this route during busy periods
3. There is a broader issue of principle here which, although it may not carry much weight in strict planning terms, is key to the long term relationship between the college and the local community.

The college has just embarked on a major re-building exercise, incorporating new schools and college alongside a major housing development, which is likely to have a considerable impact on the local community during both the construction and operational phases. This telecom proposal has been poorly managed, with no engagement from the college, and appears to have selected a site on the margins of the college estate and with maximum possible impact on the community value of the open space. The main purpose appears to be to maintain site rental

revenue at minimum cost and inconvenience to the college and the operator, and with little or no concern as to the wider impacts.

In our view this is a very poor precedent for the future relationship between the college and the local community and we ask the college to think again about its role and responsibilities to the wider area – a commitment that was such a large part of the professed approach from the college at the community liaison group meetings over several years during the re-development period.

From: Keith Hecken [<mailto:k.hecken@harlequin-group.com>]
Sent: Friday, April 7, 2017 12:59 PM
To: robgray@btinternet.com
Subject: RE: Ref EE 93212/P/KH proposed telecoms column in Craneford Fields

Dear Mr Gray,

Thank you for the below email, the contents of which have been noted.
I have forwarded your email to the College for their comments and await their reply.
Once this has been received, I'll respond to you further on the below points.

Kind regards

Keith

From: Rob Gray [<mailto:robgray@btinternet.com>]
Sent: 06 April 2017 17:12
To: Reception <reception@harlequin-group.com>
Cc: info@force.org.uk
Subject: Ref EE 93212/P/KH proposed telecoms column in Craneford Fields

Dear Sirs,

Ref: EE 93212/P/KH : proposed telecoms column in Craneford Fields

I am writing on behalf of Friends of the River Crane Environment (FORCE) with respect to the Planning Application consultation for a new 15 metre high telecoms column and associated transmission dishes proposed in Craneford Way playing fields. FORCE is a community and environmental charity formed in 2003 and with around 500 largely local members. More information on the organisation and our work can be found on our web-site www.force.org.uk

Our understanding is that this installation is being proposed as the existing site, on the side of the college buildings, will no longer be available due to construction works. Our assumption, although this is not stated in the public notice, is that the column will be on college land and the college will be receiving the rental revenue.

The site proposed is on the edge of Craneford Way playing fields and next to Marsh Farm Lane. The playing fields are an intrinsic part of the River Crane corridor – with the river itself running along their southern boundary. The site is within Metropolitan Open Land (MOL) and the area has been enjoyed by the local community as an open play area for at least 50 years. The proposed location is right at the edge of the college estate and in one of the few parts of the estate where there will be continued public access following their new build. Marsh Farm Lane is well used by local people

going to and from central Twickenham and is a long established walking route of well over 100 years extent, appearing on old OS maps of the area. This part of the lane, through the Crane corridor, has an open and uncluttered feel and is one of the places in Twickenham where you can see and appreciate the panorama of the sky with little or no interruption.

We are puzzled and concerned that this site has been proposed for a telecoms column. It is on MOL and in a location where it will have a maximum negative impact upon the public realm and upon the enjoyment of the open spaces of the Crane corridor by local people. Richmond College has a large estate and, if it is to receive the benefits of the rental from such an installation, then we suggest it is installed somewhere within the estate where the impact is not felt by the local community.

Yours faithfully,

Rob Gray
Chair of FORCE

www.force.org.uk

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