

Application reference: 19/2981/TEL HAM, PETERSHAM, RICHMOND RIVERSIDE WARD

Date application received	Date made valid	Target report date	8 Week date
03.10.2019	03.10.2019	27.11.2019	27.11.2019

Site:

Thames Young Mariners Base, Riverside Drive, Ham, Richmond

Proposal:

Installation of Telecommunications 18 metre lattice tower with 6 no. antenna at the top, installatio of 4 dishes. Installation of 2no. GPS modules above the antenna. Installation of 15 no. RRH's fixed to tower leg. Installation of 18 no. ERS units fixed to tower legs. Ancillary equipment.

Status: Pending Decision (If status = HOLD please check that all is OK before you proceed any further with this application)

APPLICANT NAME

.
260 Bath Road
Slough
SL1 4DX

AGENT NAME

Mr Ashworth
Steam Packet House
Steam Packet House, 76 Cross
Street
Manchester
M2 4JG

DC Site Notice: printed on 14.10.2019 and posted on 25.10.2019 and due to expire on 15.11.2019

Consultations:

Internal/External:

Consultee
14D Urban D
LBRUT Transport

Expiry Date
28.10.2019
28.10.2019

Neighbours:

3 Perryfield Way,Ham,Richmond Upon Thames,TW10 7SW -
246 Ashburnham Road,Ham,Richmond,TW10 7SA -
47 Perryfield Way,Ham,Richmond,TW10 7SL -
62 Woodville Road,Ham,Richmond,TW10 7QN -
254 Ashburnham Road,Ham,Richmond,TW10 7SA -
54 WYNDHAM ROAD,KINGSTON UPON THAMES,KT2 5JS -
44 Willow Bank,Ham,Richmond,TW10 7QX -
10 Breamwater Gardens,Ham,Richmond,TW10 7SQ -
58 Broughton Avenue,Ham,Richmond,TW10 7UQ -
53 Broughton Avenue,Ham,Richmond,TW10 7UG -
27 Broughton Avenue,Ham,Richmond,TW10 7TT -
19 Riverside Drive,Ham,Richmond,TW10 7QA -
79 Woodville Road,Ham,Richmond,TW10 7QW -
135 Perryfield Way,Ham,Richmond,TW10 7SN -
95 Perryfield Way,Ham,Richmond,TW10 7SL -
28 Perryfield Way,Ham,Richmond,TW10 7SP -
240 Ashburnham Road,Ham,Richmond,TW10 7SA -
1 DYSART AVENUE,KINGSTON UPON THAMES,KT2 5QZ -
42 Kingfisher Drive,Ham,Richmond,TW10 7UE -
39 Lock Road,Ham,Richmond,TW10 7LQ -
31 Fellbrook,Ham,Richmond,TW10 7UN -
55 Breamwater Gardens,Ham,Richmond,TW10 7SF -

91 Breamwater Gardens,Ham,Richmond,TW10 7SG, - 14.10.2019
87 Breamwater Gardens,Ham,Richmond,TW10 7SG, - 14.10.2019
83 Breamwater Gardens,Ham,Richmond,TW10 7SG, - 14.10.2019
89 Breamwater Gardens,Ham,Richmond,TW10 7SG, - 14.10.2019
85 Breamwater Gardens,Ham,Richmond,TW10 7SG, - 14.10.2019
79 Breamwater Gardens,Ham,Richmond,TW10 7SG, - 14.10.2019
73 Breamwater Gardens,Ham,Richmond,TW10 7SG, - 14.10.2019
81 Breamwater Gardens,Ham,Richmond,TW10 7SG, - 14.10.2019
77 Breamwater Gardens,Ham,Richmond,TW10 7SG, - 14.10.2019
75 Breamwater Gardens,Ham,Richmond,TW10 7SG, - 14.10.2019
71 Breamwater Gardens,Ham,Richmond,TW10 7SG, - 14.10.2019
69 Breamwater Gardens,Ham,Richmond,TW10 7SG, - 14.10.2019
119 Perryfield Way,Ham,Richmond,TW10 7SN -
35 Perryfield Way,Ham,Richmond,TW10 7SL -
113 Perryfield Way,Ham,Richmond,TW10 7SN -
43 Breamwater Gardens,Ham,Richmond,TW10 7SF -
15 Breamwater Gardens,Ham,Richmond,TW10 7SF -
32 Craig Road,Ham,Richmond,TW10 7JT -
10 Riverside Drive,Ham,Richmond,TW10 7QA -
63 Breamwater Gardens,Ham,Richmond,TW10 7SG -
45 Maguire Drive,Ham,Richmond,TW10 7XX -
232 Ashburnham Road,Ham,Richmond,TW10 7SA -
125 Perryfield Way,Ham,Richmond,TW10 7SN -
55 Perryfield Way,Ham,Richmond,TW10 7SL -
31A Broughton Avenue,Ham,Richmond,TW10 7TT -
13 Thamesgate Close,Ham,Richmond,TW10 7YS -
65 Breamwater Gardens,Ham,Richmond,TW10 7SG -
No 1 Bungalow Thames Young Mariners,Riverside Drive,Ham, -
1 Breamwater Gardens,Ham,Richmond,TW10 7SF -
244 Ashburnham Road,Ham,Richmond,TW10 7SA -
11 Stuart Road,Ham,Richmond,TW10 7QB -
60 Beaufort Court,Beaufort Road,Ham,Richmond,TW107YQ -
28 Willow Bank,Ham,Richmond,TW10 7QX -
4 Langham Gardens,Ham,Richmond,TW10 7LP -
238 Ashburnham Road,Ham,Richmond,TW10 7SA -
6 DYSART AVENUE,KINGSTON UPON THAMES,KT2 5RB -
13 Breamwater Gardens,Ham,Richmond,TW10 7SF -
39 BARNFIELD AVENUE,KINGSTON UPON THAMES,KT2 5RD -
41B,FAIRFIELD SOUTH,KINGSTON UPON THAMES,KT1 2UW -
38 Kingfisher Drive,Ham,Richmond,TW10 7UD -
105 Breamwater Gardens,Ham,Richmond,TW10 7SG -
203 Ashburnham Road,Ham,Richmond,TW10 7SE -
264 Ashburnham Road,Ham,Richmond,TW10 7RZ -
Thames Young Mariners Base,Riverside Drive,Ham,Richmond,TW10 7RX -
24 STRETTON Road,Ham,Richmond,TW10 7QQ -
FLAT 15,17 HATTON STREET,LONDON,NW8 8PL -
259 Ashburnham Road,Ham,Richmond,TW10 7RY -
Upper Ground Floor ,8 Marlborough Road,Richmond,TW10 6JR -
61 Breamwater Gardens,Ham,Richmond,TW10 7SG -
70 Woodville Road,Ham,Richmond,TW10 7QN -
49 Perryfield Way,Ham,Richmond,TW10 7SL -
71 Perryfield Way,Ham,Richmond,TW10 7SL -
82 Woodville Road,Ham,Richmond,TW10 7QN -
24 Perryfield Way,Ham,Richmond,TW10 7SP -
7 Riverside Drive,Ham,Richmond,TW10 7QA -
34 Stretton Road,Ham,Richmond,TW10 7QQ -
3 Rushmead,Ham,Richmond,TW10 7NW -
67 Perryfield Way,Ham,Richmond,TW10 7SL -
2 Breamwater Gardens,Ham,Richmond,TW10 7SQ -
4 Breamwater Gardens,Ham,Richmond,TW10 7SQ -
25 Perryfield Way,Ham,Richmond,TW10 7SW -
99 Perryfield Way,Ham,Richmond,TW10 7SL -
2 Old Station Gardens,Teddington,TW11 0BA -
75 Perryfield Way,Ham,Richmond,TW10 7SL -
4 Perryfield Way,Ham,Richmond,TW10 7SP -
5 BROADSTONE,FOREST ROW,RH18 5BX -

1 Burnell avenue,Ham,Tw107ye -
 126 GREEN LANE,WORCESTER PARK,KT4 8AS -
 14 CASTLE ROAD,EPSOM,KT18 7NZ -
 27D Blandford Road,Teddington,TW11 0LF -
 31 Stuart Road,Ham,Richmond,TW10 7QU -
 245 Ashburnham Road,Ham,Richmond,TW10 7RY -
 67 Broom Park,Teddington,TW11 9RR -
 26 Breamwater Gardens,Ham,Richmond,TW10 7SQ -
 250 Ashburnham Road,Ham,Richmond,TW10 7SA -
 FLAT 9,34 WINGFIELD ROAD,KINGSTON UPON THAMES,KT2 5LR -
 42,POPLAR COURT,GAP ROAD,WIMBLEDON,LONDON,SW19 8JN -
 208 Ashburnham Road,Ham,Richmond,TW10 7NL -
 27 Riverside Drive,Ham,Richmond,TW10 7QA -
 266 Ashburnham Road,Ham,Richmond,TW10 7RZ -
 217 Ashburnham Road,Ham,Richmond,TW10 7SE -
 37 Watermill Close,Ham,Richmond,TW10 7UJ -
 16 Murray Road,Ham,Richmond,TW10 7QG -
 31,Mariner Gardens,Mariner Gardens,Ham,Richmond,TW107UU -
 51 Breamwater Gardens,Ham,Richmond,TW10 7SF -
 18 Maguire Drive,Ham,Richmond,TW10 7XY -
 109 Perryfield Way,Ham,Richmond,TW10 7SN -
 91 Woodville Road,Ham,Richmond,TW10 7QW -
 239 Ashburnham Road,Ham,Richmond,TW10 7RY -
 40 Breamwater Gardens,Ham,Richmond,Tw107sh -
 3 Cleves Road,Ham,Richmond,TW10 7LD -
 83 TUDOR DRIVE,KINGSTON UPON THAMES,KT2 5NP -
 2 Stuart Road,Ham,Richmond,TW10 7QB -
 40 Breamwater Gardens,Ham,Richmond,TW10 7SH -
 59 Ham Street,Ham,Richmond,TW10 7HR -
 37 Ferrymoor,Ham,Richmond,TW10 7SD -
 33 Watermill Close,Ham,Richmond,TW10 7UJ -
 107 Perryfield Way,Ham,Richmond,TW10 7SN -
 40 Beaufort Court,Beaufort Road,Ham,Richmond,TW10 7YG -
 241 Ashburnham Road,Ham,Richmond,TW10 7RY -
 32 Perryfield Way,Richmond,TW107SP -
 10 Fisherman Close,Ham,Richmond,TW10 7YP -
 204 Ashburnham Road,Ham,Richmond,TW10 7NL -
 11 Ashley Gardens,Petersham,Richmond,TW10 7BU -
 5 Watermill Close,Ham,Richmond,TW10 7UJ -
 10 Lake Gardens,Ham,Richmond,TW10 7SJ -
 41 Breamwater Gardens,Ham,Richmond,TW10 7SF -
 31 Teddington Park Road,Teddington,TW11 8NB -
 25 Martingales Close,Ham,Richmond,TW10 7JJ -
 97 Breamwater Gardens,Ham,Richmond,TW10 7SG -
 55 Stuart Road,Ham,Richmond,TW10 7QP -
 24 Kingfisher Drive,Ham,Richmond,TW10 7UD -
 81 Perryfield Way,Ham,Richmond,TW10 7SL -
 7 Ferrymoor,Ham,Richmond,TW10 7SD -
 15 DYSART AVENUE,KINGSTON UPON THAMES,KT2 5QZ -
 21 Breamwater Gardens,Ham,Richmond,TW10 7SF -
 16 Link Way,Ham,Richmond,TW10 7QT -
 15 Link Way,Ham,Richmond,TW10 7QT -
 139 Latchmere Lane,Kingston Upon Thames,KT2 5NX -
 87 Perryfield Way,Ham,Richmond,TW10 7SL -
 12 Lovell Road,Ham,Richmond,TW10 7LB -
 75 Maguire Drive,Ham,Richmond,TW10 7XX -
 33 Willow Bank,Ham,Richmond,TW10 7QY -
 17 Neville Road,Ham,Richmond,TW10 7QJ -
 145 Hornby House,Ham Close,Ham,Richmond,TW10 7NU -
 39 Perryfield Way,Ham,Richmond,TW10 7SL -
 ,,TW10 7RX -
 35 Stuart Road,Ham,Richmond,TW10 7QU -
 No 2 Bungalow,Thames Young Mariners Base,Riverside Drive,Ham,Richmond,TW10 7RX -
 2 Burnell Avenue,Ham,Richmond,TW10 7YE -
 FLAT 54,CHELSEA REACH TOWER,WORLD`S END ESTATE,LONDON,SW10 0EG -
 85 Perryfield Way,Ham,Richmond,TW10 7SL -

127 Perryfield Way,Ham,Richmond,TW10 7SN -
 21 Ferrymoor,Ham,Richmond,TW10 7SD -
 58 Breamwater Gardens,Ham,Richmond,TW10 7SH -
 11 Breamwater Gardens,Ham,Richmond,TW10 7SF -
 16 Breamwater Gardens,Ham,Richmond,TW10 7SQ -
 49 Breamwater Gardens,Ham,Richmond,TW10 7SF -
 19 New Road,Ham,Richmond,TW10 7HZ -

History: Development Management, Appeals, Building Control, Enforcements:

Development Management

Status: GTD Application:65/1782
 Date:20/01/1966 Erection of a 6 ft. high boundary fence and construction of a 13 ft. wide concrete approach road.

Development Management

Status: GTD Application:67/2338
 Date:19/01/1968 Construction of new soil drain and water supply pipe.

Development Management

Status: GTD Application:76/0267
 Date:02/06/1976 Erection of a single-storey prefabricated building for use as a chart room.

Development Management

Status: GTD Application:11/3335/FUL
 Date:29/02/2012 Erection of a low ropes course.

Development Management

Status: GTD Application:17/4601/PS192
 Date:07/03/2018 The proposal is for the replacement of existing timber mitre lock gates with new lock gates.

Development Management

Status: PDE Application:19/2981/TEL
 Date: Installation of Telecommunications 18 metre lattice tower with 6 no. antenna at the top, installatio of 4 dishes. Installation of 2no. GPS modules above the antenna. Installation of 15 no. RRH's fixed to tower leg. Installation of 18 no. ERS units fixed to tower legs. Ancillary equipment.

Development Management

Status: PDE Application:00/2103
 Date:13/10/2000 Proposed Four Floodlighting Columns To Training Area.

Development Management

Status: GTD Application:00/3141
 Date:05/03/2001 Proposed Two Storey Pavilion And Car Parking.

Development Management

Status: GTD Application:03/3569/FUL
 Date:01/04/2004 Proposed Erection Of Sports Pavilion With Ancillary Parking.

Development Management

Status: REF Application:97/2419
 Date:14/04/1998 Erection Of Four 12m High Floodlights To Training Area.

Development Management

Status: WNA Application:97/2420
 Date:22/02/1999 New Pavilion, Showers, Toilets & Lounge Bar On First Floor. (this Application Is Outline Only, The Siting And Means Of Access Only Aspect To Be Determined At This Stage. Elevations Indicative.

Development Management

Status: GTD Application:99/0425
 Date:26/07/1999 Erection Of A Part Two Storey, Part One Storey Sports Pavilion With Pitched Roof Providing Changing And Shower Facilities, Committee Room, Office, Store, Bar And Social Area, Dining Facilities And Ancillary Accommodation, Provision Of 60 Ca

Development Management

Status: WNA Application:03/3569/DD01
 Date:21/09/2006 Details pursuant to condition LA09U (planting), LA11AU (landscaping), NS01U (external lighting) of planning permission 03/3569/FUL.

Development Management

Status: WNA Application:03/3569/DD02
 Date:21/09/2006 Details pursuant to condition BD04U (elevations to scale specifying finishes) and BD12U (materials)

<u>Development Management</u> Status: WNA Date:21/09/2006	Application:03/3569/DD03 Details pursuant to conditions BD04U (Elevations to scale specifying finishes) and BD12U (Materials) of planning application 03/3569/FUL.
<u>Development Management</u> Status: GTD Date:22/09/2006	Application:03/3569/DD04 Details pursuant to conditions BD04U (Elevations to scale specifying finishes) and BD12 (materials).
<u>Development Management</u> Status: GTD Date:23/03/2007	Application:03/3569/DD05 Details pursuant to condition NS02U (works to western and north western boundaries)
<u>Development Management</u> Status: GTD Date:10/04/2007	Application:03/3569/DD06 Details pursuant to condition LA11AU (Landscaping - not including access road surfacing) and NS04U (Screening of car park) of planning permission 03/3569/FUL
<u>Development Management</u> Status: GTD Date:11/05/2007	Application:03/3569/DD07 Submission of details pursuant to condition LA09U (planting to road side)
<u>Development Management</u> Status: GTD Date:24/08/2007	Application:07/2398/FUL Erection of sports pavilion with ancillary parking (amendment to planning permission 03/3569/Ful to include smaller footprint, omission of clock tower, changes to fenestration, external lighting to pavilion and changes to parking surface material)
<u>Development Management</u> Status: GTD Date:25/10/2007	Application:07/2398/DD01 Submission of details pursuant to condition U16352 (Boundary Works) to planning permission 07/2398/FUL - retention of replacement fencing along western/north-western boundary.
<u>Development Management</u> Status: GTD Date:25/01/2010	Application:09/2017/VRC Variation of condition U16350 (Use of Pavillion) of planning permission 07/2398/FUL preventing persons being on the premises, except between the hours of 9 a.m. to 11 p.m. Mondays to Saturdays and 9 a.m. to 10 p.m. on Sundays.
<u>Development Management</u> Status: GTD Date:23/08/2012	Application:12/1589/FUL To improve the use of the clubs existing playing field incorporating the laying of an all-weather football/sports surfacing.
<u>Development Management</u> Status: GTD Date:14/03/2013	Application:12/3805/FUL Widening of drive to Ham Playing Fields.
<u>Development Management</u> Status: GTD Date:05/07/2018	Application:18/0740/FUL Retrospective application for flexible permission for change of use from Class D2 and other community facilities to Class D2 and other community facilities and a Class D1 children's nursery. Alteration to permitted hours of operation for the proposed Class D1 use only to allow for use between the hours of 08:00 until 18:30.
<u>Development Management</u> Status: PDE Date:	Application:19/2981/TEL Installation of Telecommunications 18 metre lattice tower with 6 no. antenna at the top, installatio of 4 dishes. Installation of 2no. GPS modules above the antenna. Installation of 15 no. RRH's fixed to tower leg. Installation of 18 no. ERS units fixed to tower legs. Ancillary equipment.
<u>Appeal</u> Validation Date: 16.10.1998 Reference: 97/2419	Development Appeal

Building Control

Deposit Date: 23.03.2012 Window and door replacement
Reference: 12/0564/PP

Building Control

Deposit Date: 11.05.2016 New accessible shower and wet room
Reference: 16/1014/PP

Building Control

Deposit Date: 14.02.2006 Detached single storey sports pavilion
Reference: 06/0313/FP

Building Control

Deposit Date: 06.04.2006 Detached single storey sports pavilion
Reference: 06/0313/RS1/FP

Enforcement

Opened Date: 01.12.1998 Enforcement Enquiry
Reference: 98/00360/EN

Enforcement

Opened Date: 25.09.2006 Enforcement Enquiry
Reference: 06/0457/EN/UBW

Enforcement

Opened Date: 30.11.2007 Enforcement Enquiry
Reference: 07/0546/EN/BCN

Enforcement

Opened Date: 11.07.2014 Enforcement Enquiry
Reference: 14/0362/EN/EOP

Enforcement

Opened Date: 22.01.2015 Enforcement Enquiry
Reference: 15/0052/EN/EOP

Enforcement

Opened Date: 16.01.2018 Enforcement Enquiry
Reference: 18/0015/EN/UCU

Application reference no: 19/2981/TEL

Site address: PROPOSED BASE STATION AT HAM SAILING CLUB, RIVERSIDE DRIVE, RICHMOND, LONDON, TW10 7RX

Proposal	Installation of a 18metre lattice tower with 6no. antenna at the top. Installation of 4no.dishes. Installation of 2no. GPS Modules above the antenna. Installation of 15no. RRH's fixed to tower leg. Installation of 18no. ERS units fixed to tower legs.
Site description / key designations	The Thames Young Mariner's Base is a centre offering outdoor and water-based activities for young people. It comprises an agglomeration of single storey buildings located between the Thames to the west and Riverside Drive to the east. The application site comprises an area of grassland to the south of these buildings. The site lies within an area of Metropolitan Open Land (MOL), an Other Site Of Nature Importance and Thames Policy Area as designated by the Local Plan. It is bounded by Public Open Space to the north and south and lies within the environment agency's Flood Zones 2 and 3 and SFRA zones 3a and 3b. It is also identified by Historic England as an Archaeological Priority Area.
Planning history	The relevant planning history is available on the Council's website which relates to the building as a whole.
Policies	<p>The proposal has been considered having regard to the policies within the Council's Local Plan, in particular:</p> <p>National Planning Policy Framework (2012) London Plan (2016)</p> <p>Local Plan (2018)</p> <ul style="list-style-type: none"> • LP 1 - Local Character and Design Quality • LP5 – Views and Vistas • LP 8 - Amenity and Living Conditions • LP 13 – Green Belt, Metropolitan Open Land and Local Green Space • LP 15 - Biodiversity • LP 16 - Trees, Woodlands and Landscape • LP 18 – Thames Policy Area • LP 33 – Telecommunications <p>Supplementary Planning Documents / Guidance</p> <ul style="list-style-type: none"> • 'Telecommunications Equipment' (2006) <p>Adopted Ham & Petersham Neighbourhood Plan (C1 & G1) 2018-33</p>
Material representations	<p>The application has been subject to a large number objections from third parties, the full details of which are available to view</p> <p>182 objections have been received, predominantly from local residents and local amenity groups, including the Friends of Ham society, Ham and Petersham Neighbourhood Forum, Ham Riverside Land Limited, Ham and Peterhsam Association and the Happy Learners home education Group.. The objections are broad and wide ranging. Full details of all the comments received are available to view online, but the main points could be summarized as:</p> <p>Objection</p> <ul style="list-style-type: none"> • The mast will be unsightly and incongruous • Industrial design and height inappropriate • The proposed height and width is incompatible with other street furniture • Visual Impacts • Health Impact • Impact on Ham Lands • Unsightly • Eyesore • Completely out of keeping • Ham Lands not an area for telecoms masts • Contrary to policies within the Ham and Petersham Plan • Damaging to MOL and SINC

	<ul style="list-style-type: none"> • Harmful to trees/wildlife • Harm the view from Richmond terrace • Destructive to the environment • Industrial feature in pastoral landscape • Completely inappropriate in this natural setting • Will damage a wide area • Destroy the environment • No justification • Scale is far too much • Will ruin the entire area which is for nature conservation • Concern for health of children in a family area who use the facility • Riverside Drive is a quiet residential road, not a thoroughfare this would ruin it • Thames Young Mariners is an educational establishment, particularly the area at the foot is used by pre-school children • This is ruinous in a nature reserve • Entirely inappropriate in a unique area of nature conservation enjoyed by thousands • Visual and audible pollution • Blot on to landscape • To put this in front of an educational facility for young children is totally inappropriate • Dangerous structure • Noise • Hazardous materials • Damage the entire ecosystem <p>Support 3 letters of support, recognizing that accepting mobile phone infrastructure is a reality and the trade-off for having functioning mobile phone services is to enable the infrastructure that underpins the technology.</p>
Amendments	There have been no amendments to the scheme received during the course of this planning application.
Professional comments	<p>Professional comments</p> <p>The application is submitted under Part 16 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended). This application is for a determination as to whether prior approval of the Local Planning Authority is required for the siting and appearance of the proposed development and its impact on the adjacent occupiers. This site is located within Metropolitan Open Land (MOL) and Thames Policy Area (TPA).</p> <p>Design <i>Local Plan Policy LP 33 states that the Council will promote the enhanced connectivity of the borough through supporting infrastructure for high speed broadband and telecommunications. Applications for telecommunications development (including prior approval under Part 16 of the GPDO) will be considered in accordance with national policy and guidance and the following:</i></p> <ol style="list-style-type: none"> 1. <i>The applicant will need to submit evidence to demonstrate that all options for sharing of existing equipment, including with other operators, and erecting masts on existing tall buildings or structures, have been fully explored before considering the erection of new structures and facilities.</i> 2. <i>Visual impacts of telecommunications proposals should be minimised, in line with policies on Local Character and Design, particularly on roof tops.</i> 3. <i>The applicant has demonstrated that the development will operate within the International Commission on Non-Ionizing Radiation Protection Guidelines for public exposure.</i> <p><i>Policy LP1 states that development must be of a high architectural and urban design quality. Development must be inclusive, respect local character including the nature of a particular road, and connect with, and contribute positively, to its surroundings based on a thorough understanding of the site and its context. Particular regard should be had</i></p>

to the compatibility with local character, detailing and materials.

Policy 7.17 of the London Plan states that the strongest protection should be given to London's Metropolitan Open Land and inappropriate development refused, except in very special circumstances. The council's position on the erection of buildings on MOL is set out in Local Plan policy LP 13 and states that the borough's Metropolitan Open Land (MOL) will be protected and retained in predominately open use. There is a presumption against inappropriate development and building development is generally unacceptable. Appropriate uses include public and private open spaces and playing fields, open recreation and sport, biodiversity including rivers and bodies of water and open community uses including allotments and cemeteries. It will be recognised that there may be exceptional cases where inappropriate development such as small-scale structures for essential utility infrastructure, may be acceptable (LP13 B). Essential utility infrastructure is defined in para 5.2.4 of this policy and includes water, waste water treatment and sewage treatment plants, it does not include largescale telecommunications apparatus such as that proposed.

When considering developments on Metropolitan Open Land, any possible visual impacts on the character and openness of the Green Belt or Metropolitan Open Land will be taken into account. The proposed siting lies entirely within MOL.

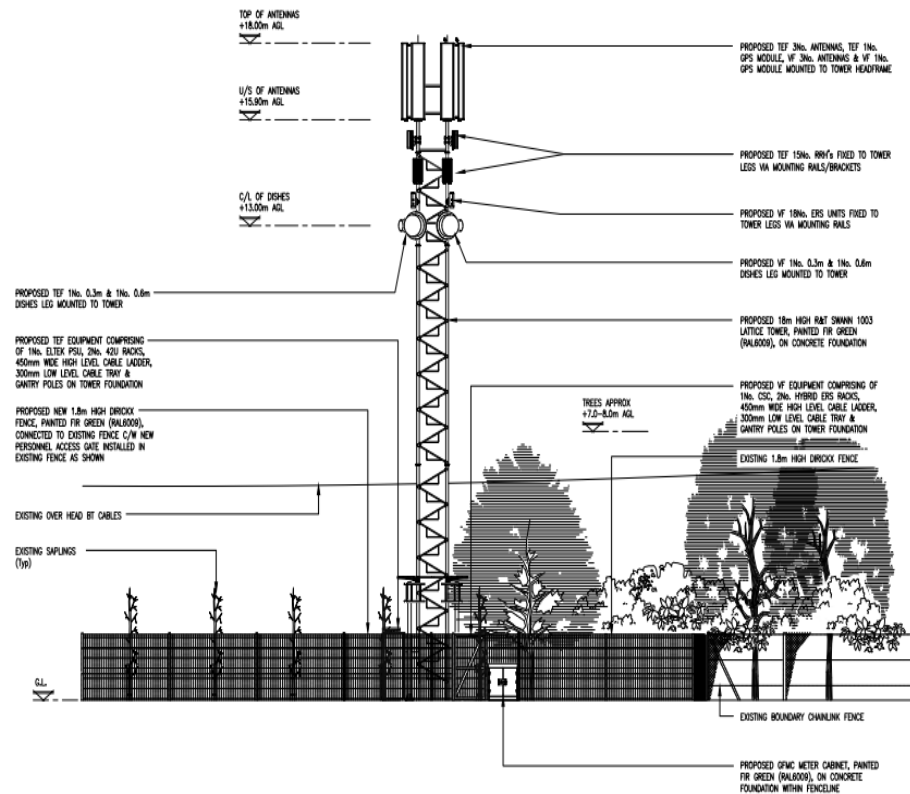
Policy LP18 Part B - Thames Policy Area (TPA) is concerned that development proposals within the Thames Policy area respect and take account of the special character of the reach.

The 'Telecommunications Equipment' SPD states that masts are generally not acceptable unless it can be demonstrated they:

- Will not be prominent in the streetscene or from dwellings;*
- Will not be detrimental to the character or appearance of important buildings including listed buildings or BTMs*
- Will not adversely affect the character of a Conservation Area;*
- Will not adversely affect the character of the Riverside;*
- Will not affect an important viewpoint or be prominent on the skyline;*
- Will not be sited so close to other telecommunications equipment or other street furniture, where it would create a cluttered visual appearance.*

This is a joint submission and includes information of alternative three sites. The scheme proposes the following:

Installation of a 18metre lattice tower with 6no. antenna at the top. Installation of 4no.dishes. Installation of 2no. GPS Modules above the antenna. Installation of 15no. RRH's fixed to tower leg. Installation of 18no. ERS units fixed to tower legs. Ancillary equipment.



The lattice tower although set against a backdrop of trees and foliage, would become by far the more prominent feature in the semi-rural surrounds on land which is MOL. At approximately 18m high, the mast would be far higher than the lampposts along Riverside Drive as well as being far higher than the surrounding trees. The top-heavy appearance, due to the installation of the antennae (as clearly demonstrated on the figure above) would be particularly incongruous in the street-scene and also over a wide area from Riverside Drive, the Ham open lands and the housing stock to the east on the other side of Riverside Drive. The associated cabinets would also give a discordant character with the surrounding Ham Lands, which is designated as an other site of nature importance, nature reserve and MOL, producing a visually jarring and readily apparent feature from a wide area, visible in all directions from the riverside, road, open land and residential property.

Additionally, mitigation offered by nearby vegetation will be significantly reduced once trees have dropped their leaves in winter. No attempt has been made to conceal the structure in any meaningful way and the impact of the structure would be visible from a wide area. Due to its height and top-heavy shape, the lattice tower would dominate the vertical emphasis in the particularly spot and the backdrop of trees and other street furniture would do little to soften the impact when viewed at some distance or close up. This is not in keeping with policies aiming to preserve the openness and setting of MOL. It would be highly visible in views from the riverside/Thames Policy Area (TPA).

The NPPF is clear that where new telecommunication sites are required, equipment should be sympathetically designed and camouflaged where appropriate. It is considered that little consideration has been made to minimise the scale of the proposal and to achieve a design that is considered to be sympathetic to its surroundings and it is clear that the proposal would appear as an intrusive and incongruous form of development within both MOL and the TPA of which it forms a part. The NPPF is clear that where new telecommunication sites are required, equipment should be sympathetically designed and camouflaged where appropriate. No meaningful effort is considered to have been made to minimise the scale or to achieve a design that is considered to be sympathetic to its surroundings, it is however clear that the proposal would appear as an intrusive and incongruous form of development prominently located within MOL.

The Urban Design officer has confirmed their view:

“This would represent visually obtrusive urban incursion into what is a pastoral scene, and visible above the tree line, and far taller, and bulkier, than local lamp columns.- within MOL/TPA and would seriously detract from the character and openness. This proposal would not satisfy criteria for vsc 'very special circumstances' for development in MOL. Not acceptable. Contrary in particular to LP13, LP18, LP1.”

These comments are noted. On VSC, policy LP13 does enable exceptions, which includes essential utility infrastructure. However, this does not include cover telecoms equipment. This site is designated MOL, whose purpose is to safeguard open land and protect and retain it in predominately open use; the proposed development is considered to be directly contrary to MOL policy and no case for very special circumstances 'VSC' has been put forward. The concept of openness is not only related to visual appearance or the extent to which development can be seen but is an intrinsic quality which along with its permanence is an essential characteristic of MOL. Openness can be defined as the absence of buildings or development. The fundamental aim of policy is to keep MOL land permanently open. The proposed structure would be dominant, cumbersome and visible from large distances across the MOL and would result in a significant reduction in openness on the site.

The strongest protection is given to London's MOL and inappropriate development refused, except in vsc and this land is given the same level of protection as in the Green Belt (Policy 7.17 London Plan). The Council's position is a presumption against inappropriate development in the MOL, and as such development should not be approved. There are considered to be no VSC (LP13) to justify this proposal and no case has been forwarded by the applicant as to why this structure should be treated as an exception. As such, given the very obvious harm to the openness of the site/MOL that would result it is considered that a case for 'very special circumstances' does not exist in this case.

Further, the proposal is also considered to be directly contrary to in particular policies C1 and G1 of the Adopted Ham & Petersham Neighbourhood Plan 2018-33 which respectively state;

“Policy C1 - Protecting Green Character

- A. The clear distinction between the built-up areas and green spaces of Ham and Petersham will be retained and, where appropriate, enhanced to ensure that the boundary is well defined, physically and visually.*
- B. In as much as any works require planning consent, the improvement, extension or renewal of existing leisure facilities within the green spaces of the neighbourhood area must have particular regard to their semi-rural setting within the open spaces when assessed in relation to the relevant policy in the Richmond Local Plan.*
- C. In as much as any works require planning consent, the materials and the design of structures in and adjacent to green spaces, including signs, fencing and lighting, must be appropriate to the open 'semi-rural' character.*

Policy Application

2.3.1 All applications on or adjacent to green spaces identified in Figure 7.1 will be expected to address this policy. The creation and expansion of sports facilities will only be considered appropriate on open spaces already used for this purpose and provided that criteria set out in the policies of this Plan and the Local Plan are met.

Reasoned Justification

2.3.2 The open semi-rural character of Ham and Petersham is one of its key characteristics. It is considered important that this character is not eroded through poorly designed or badly located developments or use of green space for inappropriate and intensive leisure uses such as sports.

2.3.3 It is also important that street furniture and other essential structures within the green spaces are designed to reflect the character of the location. Street furniture and

essential structures should be designed to comply with guidance in the LBRuT Public Space Design Guide. This approach builds on policy LP 13 and LP 14 of the Richmond Local Plan.”

And;

“Policy G1 - Open Spaces

The value of Ham and Petersham's green spaces as shown on Figure 7.1 will be conserved and enhanced by their protection from development and its adverse impacts.

Policy Application

7.3.1 *This policy applies to the open spaces as shown on Figure 7.1 and the River Thames corridor.*

Reasoned Justification

7.3.2 *These open / green spaces are considered fundamental to the character and setting of Ham and Petersham. Their conservation and improvement in accordance with the policies of the Neighbourhood Plan should, where they are publicly owned, be facilitated through the preparation and regular review and implementation of management plans with local community involvement.*

7.3.3 *Open space needs active management to maintain its appearance, enrich biodiversity, improve accessibility where appropriate and enhance value to the local community and wider interests. It is important to regularly review the different roles of our open spaces, broadening the management plans from their primary nature conservation focus to cover also their leisure, educational and landscape / townscape functions. Improved access needs to take account of biodiversity impacts. The Thames Landscape Strategy continues to provide the overall vision for the riverside corridor and various management plans for individual areas have achieved significant improvements, but the need for reviewing, updating and implementing these plans is ongoing.”*

Visual Amenity

Policy LP8 of the Local Plan (2018) requires that developments do not cause harm to neighbouring amenities in terms of daylight/sunlight, outlook, privacy, noise and disturbance. Policy LP10 of the Local Plan (2018) specifically sets out that local environmental impacts of all development proposals should not lead to detrimental effects on the health, safety and the amenity of existing and new users or occupiers of the development site, or the surrounding land.

Recent appeal decisions have stated that there is a balancing exercise to be undertaken between the significant benefits of having high quality communications infrastructure with good mobile connectivity and the availability of mobile broadband, against the harm to visual amenity. The sensitivity of the location must also be afforded appropriate weight.

The 18 metres lattice tower would be the highest structure in this area and would dominate the foreground amongst trees. This would intrude on the visual quality of the area, to be visible from areas of recreation within the Ham Lands, which is a semi-rural area and also a designated MOL, other site of nature importance nature and TPA. It would also be visible for several residents and would be an incongruous and overly dominant structure, which would completely alter the character of a large area. This would impact on the pleasantness of the scenery within the surrounds in a way that it would be abruptly noticeable and harmful. In this instance, it is considered that the public benefits of the proposal do not outweigh the harm identified.

Public Health

The NPPF states that Local Planning Authority must determine applications on planning grounds. They should not seek to prevent competition between different operators, question the need for the telecommunications system, or determine health

	<p>safeguards if the proposal meets International Commission guidelines.</p> <p>The applicant has provided the Council with the requisite ICNIRP (International Commission for Non-Ionising Radiation) declaration for public exposure and consequently an objection on public health grounds is not tenable. This position is established in planning law and in this respect the proposal is in accordance with this part of policy LP33 of the Local Plan (2018) and SPD 'Telecommunications Equipment' (2008).</p> <p>Conclusion</p> <p>Whilst the benefits of providing improved infrastructure for the telecommunications network have been taken into account and acknowledged, they are not considered to outweigh the visual harm that of this proposal would cause to a wide area of the Ham Lands, which is Metropolitan Open Land., a SINC and part of the Thames Policy Area. The VSC to justify the development have not been made and are not considered to exist.</p> <p>Given all the above, the proposal would significantly harm the openness of Metropolitan Open Land, SINC, TPA, street-scene and also to trees and visual amenity of a wide area. As such, it is contrary to relevant policies and guidance from the Local Plan (2018) and Supplementary Planning Document 'Telecommunications Equipment' (2006).</p>
Recommendation	REFUSE prior approval.

The determination of this application falls within the scope of Officer delegated powers - **YES**
I therefore recommend the following:

- 1. REFUSAL
- 2. PERMISSION
- 3. FORWARD TO COMMITTEE

This application is CIL liable YES* NO
(*If yes, complete CIL tab in Uniform)

This application requires a Legal Agreement YES* NO
(*If yes, complete Development Condition Monitoring in Uniform)

This application has representations online YES NO

Case Officer (Initials): VAA..... Dated: 05/11/2019.....

I agree the recommendation:

Team Leader/Head of Development Management/Principal Planner

Dated:

This application has been subject to representations. The Head of Development Management has considered those representations and concluded that the application can be determined without reference to the Planning Committee in conjunction with existing delegated authority.



Head of Development Management:

Dated: ...18.11.2019.....

The following table will populate as a quick check by running the template once items have been entered into Uniform

SUMMARY OF CONDITIONS AND INFORMATIVES

CONDITIONS

U0071574	Siting and Appearance
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INFORMATIVES

U0038592	NPPF REFUSAL- Para. 38-42
U0038432	Decision Documents
