



**SUPPLEMENTARY INFORMATION**

**1. Site Details**

Site Name:	Cemetery	Site Address:	Cemetery Hanworth Road Whitton Twickenham Richmond Upon Thames London TW4 5NH
National Grid Reference:	E: 512740 N: 173673		
Site Ref:	RUT004/50970	Site Type: <sup>1</sup>	Macro

**2. Pre-Application Check List - Site Selection (for New Sites only)**

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	No
If no explain why:  No suitable alternatives were identified. Re-use of an existing telecommunications site is the preferred option.		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why:  No suitable alternatives were identified. Re-use of an existing telecommunications site is the preferred option.		

**Annual Area Wide Information to local planning authority**

Date of information submission to local planning authority	<b>Information not available</b>
Name of Contact:	
Summary of any issues raised:	

**Pre-application consultation with local planning authority**

Date of written offer of pre-application consultation:	08/10/2019
Was there pre-application contact:	
Date of pre-application contact:	
Name of contact:	
Summary of outcome/Main issues raised:  Request for pre-application consultation emailed to the Planning Department, no response received to date	



**Ten Commitments Consultation**

Rating of Site under Traffic Light Model:	Amber
<p>The site was rated as amber due to its proximity to residential dwellings and Hounslow Cemetery. Pre-application consultation letters were sent to the following people on 8<sup>th</sup> October 2019: -</p> <p>Councillor John Coombs Councillor Lesley Pollesche Councillor Michael Wilson Sir Vince Cable MP</p> <p>No response received to date.</p>	

**School/College**

<p>Location of site in relation to school/college (<i>include name of school/college</i>):</p> <p>There are no schools within the immediate area</p>
<p>Outline of consultation carried out with school/college (<i>include evidence of consultation</i>):</p> <p>N/A</p>
<p>Summary of outcome/Main issues raised:</p> <p>N/A</p>

**Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation (only required for an application for prior approval)**

Will the structure be within 3km of an aerodrome or airfield?		<b>No</b>
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		<b>No</b>
<p>Details of response:</p> <p><b>N/A</b></p>		

**Developer's Notice**

Copy of Developer's Notice enclosed?		<b>No</b>
Date served:	FULL PLANNING APPLICATION- Article 13 Notice served.	



### 3.0 Proposed Development

#### **The proposed site:**

The proposed site lies to the West of Hanworth Road (A314), adjacent to the existing mast. Hounslow Cemetery lies immediately West of the proposed base station, running parallel with part of Hanworth Road. Mill Farm Business Park backs onto Hounslow Cemetery, with the Waterloo to Reading railway line running to the North and merging with the Hounslow Loop Line.

To the East of the site, there lies a retail parade. Benefiting from a number of key local amenities, with the proposed mast located opposite a car garage along the parade. The wider area is populated with residential dwellings and areas of open space.

To the West of the site, running parallel with Hanworth Road there is much tree cover. Offering screening and a backdrop for the proposed equipment, mitigating potentially harmful views from within the Cemetery and surrounding properties. Within the existing street scene, traffic lights, street trees and street lighting columns are present, providing context and vertical reference. Along the retail parade, bold business signage, associated clutter and dilapidated shop fronts also run parallel with Hanworth Road. Allowing the mast to be simply seen as another vertical element within the street scene.

Flats are situated above the shops fronting onto Hanworth Road. However, being located opposite a car garage, any direct views are to be avoided. With the existing mast located outside of shops with flats above. The revised location is seen as the most suitable deployment solution. Any view of the proposed mast is to be in conjunction with mature tree cover and amongst existing vertical features. Preserving the character and amenity of nearby occupiers.

There are no listed buildings within the surrounding area and the site does not fall within any specific land designations. Hounslow Cemetery to the West is an area of Other Open Land of Townscape Importance. Hanworth Road is a primary road, in addition to a London Loop Outer Orbital Walking Route. With the retail parade immediately East an area of Mixed Use. The existing mast has been deployed and developed without causing any undue harm to the amenity of the area. located upon the pavement off the carriageway, there is not be no loss of valuable landscape within the area and the mast has been specifically located as to avoid direct views with nearby residents.

The re-use of an existing site represents the preferred option, as outlined in the NPPF discussed in further detail below. Full consideration has been given to alternative sites and other existing masts in the vicinity. However, the proposed location and design are considered to provide the optimum solution in this instance, the site has to fit into an existing network and re-using the existing site will mitigate the need for an additional site within the area and maintain the current level of network coverage.

Site notices notifying the public of the proposal have been put in place during the survey stage of site identification.

#### **View of existing mast from the South, along Hanworth Road.**



**View of existing mast from the North, along Hanworth Road.**



**Current Telecommunications Use/ The Future**

Mobile operator networks have been under increased pressure to provide up-to-date telecommunications functionality, as mobile phones and mobile broadband use have become increasingly essential to our daily lives. 5G is the next generation of technology to enable increased connectivity with increased data speeds. The growth of digital connectivity over the last decade and the expectations of users have advanced at an unprecedented level. The NPPF recognises that “Advanced high quality and reliable telecommunications infrastructure is essential to economic growth...”, as will be considered in more detail below. The current proposal will provide positive benefits to the community which will far outweigh any perceived negative impacts. MBNL have produced an advisory note entitled 5G and Future Technology- Delivering the UK’s Telecoms Future and this is enclosed as part of the application.

Enclose map showing the cell centre and adjoining cells:

**The proposed development provides a solution to upgrade the existing site. The existing coverage will be maintained and the technology will be upgraded to provide 5G. It is therefore not considered necessary to provide coverage plots in this instance.**

Type of Structure (e.g. tower, mast, etc.):

Description: - The upgrading of the telecommunications base station located at Cemetery, Hanworth Road, Whitton, Twickenham, Richmond Upon Thames, London, TW4 5NH

The installation of a 20m monopole, 12 no. antenna apertures, equipment cabinets, the removal of the existing 11.85m monopole, 3 no. antennas, redundant equipment cabinets and development ancillary thereto.

Overall Height: 20m

Height of existing building (where applicable):

**N/A**



Equipment Housing:	
Length:	As per attached drawings
Width:	
Height:	
Materials ( <i>as applicable</i> ):	
Tower/mast etc. – type of material and external colour:	<b>As per attached drawings</b>
Equipment housing – type of material and external colour:	<b>As per attached drawings</b>

**Reasons for choice of design:**

The mast has been specifically designed for the site in question, taking into account the existing street scene. Whilst the proposed replacement mast is taller than that which already exists, it needs to be in order to introduce the required technologies to the area. Although it will rise above the height of the existing installation, it is considered that the overall benefits of the scheme will offset any potential visual impact that may arise. The proposal needs to be seen in the context of the overall benefits that will occur from the introduction of 5G technologies to the area.

The proposal has been designed with the aim of achieving a balance between minimising visual impact and achieving the technical requirements needed by the operator. It is necessary for the height of the structure to ensure that interference is avoided, the topography of the landscape does not have an unacceptable impact upon mobile signal quality and that the structure is able to support the 5G antenna and other apparatus.

There is a presence of vertical features within the immediate area, providing context. Some of these features have similar vertical lines to the proposed monopole, allowing it to be simply seen as just another vertical feature within the street scene. The relocation of an existing telecommunications site will avoid the need for a proliferation of additional telecommunications sites in the immediate area.

The telecommunications base station has been specifically sited, amongst tree cover and off a busy carriageway as to provide screening and context. Existing equipment from the current site is to be removed, as to keep clutter to the minimum.

The applicant acknowledges that there is a change of location, however underground utilities prevent an exact replacement in the same position in relation to the existing site. Furthermore, removing the existing mast and locating the new base station in its place would leave a hole in the network. This would have an unacceptable impact on coverage, detrimental to the Emergency Service Network.

It is recognised that there is an increase in the scale of telecommunications development on the site. However, the proposed site will be seen in the context of the existing vertical features in the street scene. The height of the mast is required to overcome the height of the nearby existing trees, buildings and housing, in order to function and upgrade the technologies available in the area.

Any perceived negative visual impacts are far outweighed by the overall benefits of the scheme. It should be noted that the new technologies will provide advanced high-quality

communications infrastructure essential for economic growth as sought by the NPPF and the proposed form of development provides the optimum solution in this instance.

#### 4.0 Technical Information

<p>International Commission on Non-Ionizing Radiation Protection Declaration attached (see below) *</p> <p>International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines.</p> <p>All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference.</p> <p>The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.</p>	<b>Yes</b>	<b>No</b>
Frequency	To be provided on request	
Modulation characteristics <sup>2</sup>	To be provided on request	

<sup>2</sup> The modulation method employed in GSM is MGKS (Gaussian Minimum Shift Keying) which is a form of Phase Modulation.

The modulation method employed in UMTS is QPSK (Quad Phase Shift Keying) which is another form of Phase Modulation.



<p>Power output (expressed in EIRP in dBW per carrier)</p> <p>In order to minimise interference within its own network and with other radio networks, EE operates its network in such a way that radio frequency power outputs are kept to the lowest levels commensurate with effective service provision.</p> <p>As part of EE's network, the radio base station that is the subject of this application will be configured to operate in this way.</p>	<p>To be provided on request</p>
<p>Height of antenna (m above ground level)</p>	<p>20m</p>

## 5.0 Technical Justification

Enclose predictive coverage plots if appropriate, e.g. to show coverage improvement. Proposals to improve capacity will not generally require coverage plots.

The proposed development provides a solution to upgrade the existing site. The existing coverage will be maintained and the technology will be upgraded to provide 5G. It is therefore not considered necessary to provide coverage plots in this instance.

For the 5G upgrade, MBNL are not able to utilise the existing mast currently in place, as this site is unable to accommodate for the 5G equipment. Please see below the detailed justification, as to the reasons why the existing mast has been ruled out, and why the proposed (HS2) solution has been implemented;

Existing Street works Pole:

1. Existing Street works sites typically utilise 3x Sector Antennas at the same level with each antenna being shared by EE and 3UK. The antenna azimuths are directed 120deg apart to give 360deg total coverage for both operators.
2. Existing Street works antennas are used for 2G/3G/4G technologies for EE and 3G/4G for 3UK. In other words: voice, text and data services share the same antennas for both EE and 3UK.
3. The antennas in the current Street works pole are restricted to the 1800MHz/2100MHz frequency bands which limits the capacity of the sites. Additional 800Mhz, 1400MHz, 2600Mhz and 3500MHz bands are now available but these bands have different physical antenna requirements; the HS2 upgrades will enable usage of these additional bands to increase coverage and capacity and to enable 5G technology.
4. The existing shared antenna configuration restricts how Street works sites can be tuned for individual differences in capacity and coverage requirements between the EE and 3UK networks.

## Replacement HS2 Pole Design:

1. In order to maintain coverage (which is height dependent) for all frequency bands and technologies the lowest antenna height in the HS2 design must be the same as, or greater than, the antenna height of the existing Street works pole.
2. Reducing the antenna height would potentially remove coverage for existing mobile phone users.
3. The HS2 design contains 12x Individual sector antennas positioned at 4 levels (3x 120deg sector antennas per level)
4. The antennas in the lower two levels provide 2G/3G/4G coverage in the 800MHz, 1400MHz, 1800MHz, 2100MHz and 2600MHz Bands. These antennas provide a mixture of voice, data and text to mobile phone users.
5. The antennas in the upper two levels provide 5G coverage in the 3500MHz band. These antenna provide 5G high speed / low latency packet data (for applications such as HD Video, Home Broadband and Machine to Machine Communications)
6. The 3500MHz band has the poorest radio propagation characteristics of all the presently available bands – this issue is somewhat mitigated by positioning them at the top of the antenna array.
7. Some vertical separation (0.5m) is required between antennas to prevent adjacent antennas interfering with each other.
8. Many elements of antenna sharing between EE and 3UK are removed in the HS2 design. This means that the site can be better tuned for EE and 3UK's individual coverage and capacity requirements.

### **Background:**

As part of EE Ltd.'s and H3G Ltd.'s continued network improvement program they wish to upgrade the existing site to facilitate additional coverage and capacity requirements, incorporating new technologies. Section 10 of the NPPF sets out the Government's general overview regarding supporting high quality communications infrastructure, recognising that advanced, high quality communications infrastructure is essential for sustainable economic growth. In order to keep the number of base stations to a minimum, the use of existing sites is considered to provide the optimum solution and accordingly the proposed site upgrade should be viewed positively. As such, no alternative locations were sought in this instance.

Base stations use radio signals to connect mobile devices and phones to the network, enabling people to send and receive; calls, texts, emails, pictures, web, TV and downloads. Without base stations, mobiles devices and phones will not work.

Many other everyday items also use radio signals to send and receive information, such as television and radio broadcasting equipment and two-way radio communications. Base stations are connected to each other and telephone exchange buildings by cables or wireless technology such as microwave dishes, to create the network. The area each base station covers is called a "cell". Each cell overlaps with its neighbouring cells to create a continuous network. The size and shape of each cell is determined by the features of the surrounding area, such as buildings, trees and hills which can block





signals. When people travel between cells, the signal is transferred between base stations without a break in service. Each base station covers a certain area only and can only handle a limited number of calls at once. As mobile phones and devices become more popular, more base stations are needed to ensure continuous coverage.

It is imperative that support is given to the introduction of new infrastructure to allow new technology which will allow networks to be able to handle more data and connect more devices simultaneously at much faster speeds. This will enable places to remain competitive and will support the Government's ambition for the UK to become a world leader in telecommunications technologies and development. Whilst it is acknowledged that there is a significant increase in the scale of telecommunications development on the site, it should be noted that the new technologies will provide advanced high-quality communications infrastructure essential for economic growth as sought by the NPPF. Any perceived negative impacts will be far outweighed by the overall benefits of the scheme and the location of the apparatus on a building which already supports extensive telecommunications equipment will minimise its potential impact on the immediate environment.

All EE installations are designed to be fully compliant with the public exposure guidelines established by the International Commission on Non-Ionizing Radiation Protection (ICNIRP). These guidelines have the support of UK Government, the European Union and they also have the formal backing of the World Health Organisation. A certificate of ICNIRP compliance will be included within the planning submission.

Alternative sites considered and not chosen (not generally required for **upgrades/alterations to existing sites** including redevelopment of an existing site to facilitate an upgrade or sharing with another operator).

Site <sup>3</sup>	Site Name and address	National Grid Reference	Reason for not choosing <sup>4</sup>
RT			There are currently no buildings over 15m within the vicinity of the site that would be capable of accommodating telecommunications equipment.
ETS	Existing MBNL Mast, Cemetery, Hanworth Road, Whitton, Twickenham, Richmond Upon Thames, London, TW4 5NH	E: 512745 N: 173692	The existing mast currently in place is not capable of accommodating for the 5G equipment, in its current form. Additionally, due to the lack of room due to underground utilities, the new mast and its associated equipment cabinets would not be able to fit in the exact location. This site will be replaced by the proposed site.
ETS	Network Rail Mast, Hounslow, Middlesex, TW4 5QN	E: 512802 N: 173814	The Network Rail mast sits at a low elevation, alongside the railway. Not only would the existing mast not be able to accommodate for the additional 5G equipment it also would not benefit from enough height to provide the required coverage.
ETS	Existing CTIL Mast, Hanworth Road, Whitton, Twickenham, Richmond Upon Thames, London, TW4 5NP	E: 512714 N: 173635	The existing CTIL mast is not capable of accommodating for the two additional operators and equipment.
GF	Land due West, Hanworth Road, Whitton, Twickenham, Richmond	E: 512759 N: 173744	Any land to the West of the site has been specifically avoided as to preserve the character and amenity of the Cemetery and preventing any loss of valuable land

<sup>3</sup> ETS - Existing Telecomm site, ES - Existing Structure, RT - Roof Top, GF - Greenfield

<sup>4</sup> SP - Site Provider, RD - Redevelopment Not Possible, T - Technical Difficulties, P – Planning  
 O – Other



	Upon Thames, London, TW4 5NH		within the grounds.
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**The site is an existing telecommunications site which is to be replaced and upgraded. As such, upgrading the existing site was considered to be the preferred option in this instance.**



## **Additional relevant information**

### **Planning Policy Assessment**

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with policies of the adopted Statutory Development Plan, unless material considerations indicate otherwise.

### **National Planning Policy Framework (2018)**

The National Planning Policy Framework (NPPF) was published in July 2018 and supersedes previous versions of the document and national planning guidance contained in the various Planning Policy Guidance notes and planning Policy Statements. The NPPF sets out the Government's economic, environmental and social planning policies and how these are to be applied in relation to all planning applications.

Under Section 6 paragraph 80 the NPPF advises....” *Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.*” In terms of supporting a prosperous rural economy paragraph 84 ...” *The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.*” The proposal seeks the upgrade of an existing telecommunications site, rather than utilising land which has not previously been developed. This approach provides a sustainable solution to the need to upgrade telecommunications services in the area which will benefit not only the local community, but also visitors to the area and potentially reducing the need to travel.

In section 10 of the new NPPF, the document seeks to support “*Advanced, high quality and reliable communications infrastructure*” ensuring that it is “*essential to economic growth and social wellbeing*”. It advises that “*planning policies and decisions should support the expansion of electronic communications networks including next generation mobile technology (such as 5G) and full fibre broadband connections.*” Paragraph 113 states” *the number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate.*” The proposal allows for the re-use of an existing telecommunications site which will be upgraded to allow for the introduction of 5G technologies.

Paragraph 114 continues” *Local planning authorities should not impose a ban on new electronic communications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of electronic communications development, or insist on minimum distances between new electronic communications development and existing development. They should ensure that:*



a) they have evidence to demonstrate that electronic communications infrastructure is not expected to cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and

b) They have considered the possibility of the construction of new buildings or other structures interfering with broadcast and electronic communications services.

The scheme will not cause any undue impact on the services outlined above and fully complies with ICNIRP standards. An ICNIRP certificate is enclosed with the application. The proposal has been designed with the aim of achieving a balance between minimising visual impact and achieving the technical requirements for EE Ltd and H3G (UK) Ltd to enhance telecommunications services in the area to the benefit of the local community and visitors to the area. It will make effective use of the land as set out under Section 11 of the NPPF. It is considered the proposed development complies with the broad aims of the NPPF. It assists in the aim to keep the number of installations to a minimum, by utilising an existing site. The equipment has been sympathetically designed, with the pole being kept to the minimum practicable height for the required to accommodate 5G network coverage.

### **Local Plan Policy**

**The statutory development plan for the area is comprised of The London Plan, March 2016 and London Borough of Richmond upon Thames Local Plan (adopted July 2018)**

### **The London Plan, March 2016**

#### ***“POLICY 4.11 ENCOURAGING A CONNECTED ECONOMY***

##### *Strategic*

A. *The Mayor and the GLA Group will, and all other strategic agencies should:*

- a) *facilitate the provision and delivery of the information and communications technology (ICT) infrastructure a modern and developing economy needs, particularly to ensure: adequate and suitable network connectivity across London (including well designed and located street-based apparatus); data centre capability; suitable electrical power supplies and security and resilience; and affordable, competitive connectivity meeting the needs of small and larger enterprises and individuals.*
- b) *Support the use of information and communications technology to enable easy and rapid access to information and services and support ways of working that deliver wider planning, sustainability and quality of life benefits.”*

It is contended that the installation will comply with Policy 4.11, securing the Mayor’s vision for the delivery of modern communications networks across London. The proposed installation will bring 5G to the area, supporting modern infrastructure and providing the best network connectivity possible. The 5G network is to be the



fastest service operators are able to provide, the new technology will enable easy and rapid access to information. The services provided by the mast will benefit both the local community, businesses and visitors alike.

### **“POLICY 7.5 PUBLIC REALM**

#### *Strategic*

*A London’s public spaces should be secure, accessible, inclusive, connected, easy to understand and maintain, relate to local context, and incorporate the highest quality design, landscaping, planting, street furniture and surfaces.*

#### *Planning decisions*

*B Development should make the public realm comprehensible at a human scale, using gateways, focal points and landmarks as appropriate to help people find their way. Landscape treatment, street furniture and infrastructure should be of the highest quality, have a clear purpose, maintain uncluttered spaces and should contribute to the easy movement of people through the space. Opportunities for the integration of high-quality public art should be considered, and opportunities for greening (such as through planting of trees and other soft landscaping wherever possible) should be maximised. Treatment of the public realm should be informed by the heritage values of the place, where appropriate.*

*C Development should incorporate local social infrastructure such as public toilets, drinking water fountains and seating, where appropriate. Development should also reinforce the connection between public spaces and existing local features such as the Blue-Ribbon Network and parks and others that may be of heritage significance.”*

The proposed site is set off Hanworth Road, within a mixed-use area. Compromising of a retail parade, residential dwellings and areas of open space, including Hounslow Cemetery directly West. Due to the high level of public activity within the vicinity, the need for high quality, up to date telecommunications is vital to ensure the future prosperity of the area in general and ensuring that the needs of the local community and businesses within the area are met.

The proposed increase in height is the minimum capable of providing the technological improvements sought. It is imperative that support is given to the introduction of 5G technology as this will allow networks to be able to handle more data and connect more devices simultaneously at much faster speeds than is possible using the existing technology. This will enable places to remain competitive in and will support the Government’s ambition for the UK to become a world leader in 5G. The proposed replacement mast needs to be taller than the existing mast to introduce the required new technologies to the area. It will therefore rise above the height of the nearby lighting columns. However, it will provide significant benefits to the local community and the businesses within the immediate area.

### **London Borough of Richmond upon Thames Local Plan**

#### ***Policy LP 1 Local Character and Design Quality***



*A. The Council will require all development to be of high architectural and urban design quality. The high-quality character and heritage of the borough and its villages will need to be maintained and enhanced where opportunities arise. Development proposals will have to demonstrate a thorough understanding of the site and how it relates to its existing context, including character and appearance, and take opportunities to improve the quality and character of buildings, spaces and the local area.*

*To ensure development respects, contributes to and enhances the local environment and character, the following will be considered when assessing proposals:*

- 1. compatibility with local character including the relationship to existing townscape, development patterns, views, local grain and frontages as well as scale, height, massing, density, landscaping, proportions, form, materials and detailing;*
- 2. sustainable design and construction, including adaptability, subject to aesthetic considerations;*
- 3. layout, siting and access, including making best use of land;*
- 4. space between buildings, relationship of heights to widths and relationship to the public realm, heritage assets and natural features;*
- 5. inclusive design, connectivity, permeability (as such gated developments will not be permitted), natural surveillance and orientation; and*
- 6. suitability and compatibility of uses, taking account of any potential adverse impacts of the collocation of uses through the layout, design and management of the site.*

*All proposals, including extensions, alterations and shopfronts, will be assessed against the policies contained within a neighbourhood plan where applicable, and the advice set out in the relevant Village Planning Guidance and other SPDs relating to character and design.*

#### *Shopfronts*

*B. The Council will resist the removal of shopfronts of architectural or historic interest. Shopfronts, including signage and illumination, should complement the proportions, character, materials and detailing, surrounding streetscene and the building of which it forms part. Blinds, canopies or shutters, where acceptable in principle, must be appropriate to the character of the shopfront and the context within which it is located. External security grilles and large illuminated fascias will only be allowed in exceptional circumstances. In sensitive areas, such as Conservation Areas and relevant Character Areas as identified in the Village Planning Guidance SPDs, rigid and gloss finish blinds will generally be unacceptable.*

#### *Advertisements and hoardings*

*C. The Council will exercise strict control over the design and siting of advertisements and hoardings to ensure the character of individual buildings and streets are not materially harmed, having regard to the interests of amenity and public safety (including highway safety).*



In devising the scheme consideration has been given to the character and appearance of the existing area, the required technical improvements sought. Whilst the replacement mast is larger than that which already exists, it needs to be in order to provide the required technologies.

Re-use of an existing site represents the preferred approach, as set out in the NPPF and will avoid the need for additional structures in the vicinity. A high-quality design, utilising the most up to date equipment and technologies is proposed. Existing vertical features within the immediate area, off the carriageway will provide context to the mast. With the area being one of which that generates much activity, there is a need for up to date technologies. Safeguarding the future prosperity of the area and meeting the diverse consumer need in the area.

In all these circumstances, notwithstanding the increase in scale proposed it is considered that the mast will be assimilated into the existing environment without causing any significant harm to the overall character and appearance of the area. Any perceived negative impacts in visual terms will be outweighed by the overall benefits of the proposal in bringing up to date technologies to the area.

### ***Policy LP 5 Views and Vistas***

*The Council will protect the quality of the views, vistas, gaps and the skyline, all of which contribute significantly to the character, distinctiveness and quality of the local and wider area, by the following means:*

- 1. protect the quality of the views and vistas as identified on the Policies Map, and demonstrate such through computer-generated imagery (CGI) and visual impact assessments;*
- 2. resist development which interrupts, disrupts or detracts from strategic and local vistas, views, gaps and the skyline;*
- 3. require developments whose visual impacts extend beyond that of the immediate street to demonstrate how views are protected or enhanced;*
- 4. require development to respect the setting of a landmark, taking care not to create intrusive elements in its foreground, middle ground or background;*
- 5. seek improvements to views, vistas, gaps and the skyline, particularly where views or vistas have been obscured;*
- 6. seek improvements to views within Conservation Areas, which:*
  - a. are identified in Conservation Area Statements and Studies and Village Plans;*
  - b. are within, into, and out of Conservation Areas;*
  - c. are affected by development on sites within the setting of, or adjacent to, Conservation Areas and listed buildings.*

The proposed base station has been designed to the highest possible standard with the best equipment available. The proposed monopole benefits from a slim profile with a compact headframe as to remain an unobtrusive feature in the street scene. The mast has been sited upon the pavement of a busy carriageway, amongst existing vertical features and thick tree cover to the rear of the base station as to provide context.

The proposed monopole stands at the minimum height possible in order to meet the needs of the radio planner, comply with ICNIRP requirements and overcome





intervening features within the environment. The proposed base station has been specifically located as to avoid conflict with any surrounding land designations and residential properties. There are no listed buildings within over an 800m radius of the site and no nearby Conservation Areas. Trees around the boundary of the adjacent cemetery are to provide ample screening to apparatus and mitigate many potentially harmful views.

It is imperative that support is given to the introduction of 5G technology as this will allow networks to be able to handle more data and connect more devices simultaneously at much faster speeds than is possible using the existing technology. This will enable places to remain competitive in and will support the Government's ambition for the UK to become a world leader in 5G.

In all these circumstances it is contended that the proposal meets the spatial objectives and aspirations of Policy LP 1. Any perceived negative visual impacts are far outweighed by the positive benefits of the scheme.

### **Policy LP 8 Amenity and Living Conditions**

*All development will be required to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties. The Council will:*

- 1. ensure the design and layout of buildings enables good standards of daylight and sunlight to be achieved in new development and in existing properties affected by new development; where existing daylight and sunlight conditions are already substandard, they should be improved where possible;*
- 2. ensure balconies do not raise unacceptable overlooking or noise or disturbance to nearby occupiers; height, massing or siting, including through creating a sense of enclosure;*
- 3. ensure that proposals are not visually intrusive or have an overbearing impact as a result of their height, massing or siting, including through creating a sense of enclosure;*
- 4. ensure there is no harm to the reasonable enjoyment of the use of buildings, gardens and other spaces due to increases in traffic, servicing, parking, noise, light, disturbance, air pollution, odours or vibration or local micro-climatic effects.*

*Applicants are expected to have regard to the guidance set out within the Council's SPDs relating to design, including Village Planning Guidance, SPDs on extensions, infill and backland developments, housing mix and standards as well as residential development standards*

The site has been located as to specifically avoid conflict with nearby residents. The proposed location is now located outside of a car garage, in comparison with the existing site situated outside of shops with flats above. Any view from residential dwellings within the immediate area will be restricted to oblique angles. The slim profile of the monopole is to limit shadowing and the highest quality materials have been employed to provide the best possible service. Every effort has been made in order to keep visual intrusion to the minimum, preserving the amenity of nearby



occupiers.

### **Policy LP 14 Other Open Land of Townscape Importance**

*Other open areas that are of townscape importance will be protected in open use, and enhanced where possible.*

*It will be recognised that there may be exceptional cases where appropriate development is acceptable. The following criteria will be taken into account when assessing whether development is appropriate:*

- a. it must be linked to the functional use of the Other Open Land of Townscape Importance; or*
- b. it can only be a replacement of, or minor extension to, existing built facilities; and*
- c. it does not harm the character or openness of the open land.*

*Improvement and enhancement of the openness or character of other open land and measures to open up views into and out of designated other open land will be encouraged.*

*When considering developments on sites outside designated other open land, any possible visual impacts on the character and openness of the designated other open land will be taken into account.*

Hounslow Cemetery directly West of the site is an area of Open Land of Townscape Importance. The proposed 5G upgrade is to merely extend on the development already in place off the carriageway. Trees within the Cemetery will be used to their benefit, providing screening and limiting views of the proposed base station. In addition to acting as a backdrop for the development. There is to be no loss of Open Land of Townscape Importance, with thick hedgerow around the boundary of the Cemetery preventing the encroachment into the open land. Preserving the features within and ensuring the continued openness and amenity of the area.

### **Policy LP 30 Health and Wellbeing**

*Planning, at all levels, can play a crucial role in creating environments that enhance people's health and wellbeing. The Council promotes and supports healthy and active lifestyles and measures to reduce health inequalities.*

*A. The Council will support development that results in a pattern of land uses and facilities that encourage:*

- 1. Sustainable modes of travel such as safe cycling routes, attractive walking routes and easy access to public transport to reduce car dependency.*
- 2. Access to green infrastructure, including river corridors, local open spaces as well as leisure, recreation and play facilities to encourage physical activity.*
- 3. Access to local community facilities, services and shops which encourage opportunities for social interaction and active living, as well as contributing to dementia-friendly environments.*
- 4. Access to local healthy food, for example, allotments and food growing spaces.*
- 5. Access to toilet facilities which are open to all in major developments where appropriate (linked to the Council's Community Toilet Scheme).*



*6. An inclusive development layout and public realm that considers the needs of all, including the older population and disabled people.*

*7. Active Design which encourages wellbeing and greater physical movement as part of everyday routines.*

*B. This policy will be delivered by requiring developments to comply with the following:*

*1. A Health Impact Assessment must be submitted with all major development proposals.*

*2. The Council will manage proposals for new fast food takeaways (A5 uses) located within 400 metres of the boundaries of a primary or secondary school in order to promote the availability of healthy foods.*

*3. Existing health facilities will need to be retained where these continue to meet, or can be adapted to meet, residents' needs.*

*4. Applications for new or improved facilities or loss of health and social care facilities will be assessed in line with the criteria set out in the Social and Community Infrastructure policy.*

The proposed installation will bring 5G to the area, supporting modern infrastructure and providing the best network connectivity possible. The 5G network is to be the fastest service operators are able to provide, the new technology will enable easy and rapid access to information. The services provided by the mast will benefit both the local community, businesses and visitors alike thereby creating a well-connected community.

The telecommunications network is extremely diverse, providing a range of services to a range of people and businesses. Accessible to all, the proposed base station will be a valuable asset within the community, meeting the needs of many. Along this London Loop Outer Orbital Walking Route, the enhanced communications are to improve user experiences. Providing the opportunities to further develop the walking route, incorporating new features associated with the new 5G development leading to lasting public usability. The enhanced technologies allow for super-fast data upload and retrievals, supporting the use of public transport within the Borough by enabling easy and fast access to information and incorporating smart features unlocked by the new technologies.

The 5G network is the fastest and most reliable network connection operators are able to provide. In an active area, such as this. The super-fast technologies are to promote safety within the community, encouraging outdoor activities, leading to a healthy community.

### ***Policy LP 33 Telecommunications***

*The Council will promote the enhanced connectivity of the borough through supporting infrastructure for high speed broadband and telecommunications.*

*Applications for telecommunications development (including for prior approval under Part 16 of the General Permitted Development Order, or any other such future Order) will be considered in accordance with national policy and guidance and the following:*



- 1. 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 or facilities.*
- 2. Visual impacts of telecommunications proposals should be minimised, in line with policies on Local Character and Design, particularly on roof tops.*
- 3. The applicant has demonstrated that the development will operate within the International Commission on Non-Ionizing Radiation Protection Guidelines for public exposure*

Network planners have identified the need to upgrade this existing telecommunications site and it is proposed to introduce up to date technologies to the area. It is imperative that support is given to the introduction of 5G technology as this will allow networks to be able to handle more data and connect more devices simultaneously at much faster speeds than is possible using the existing technology. This will enable places to remain competitive in and will support the Government's ambition for the UK to become a world leader in 5G.

The proposed tower is the minimum height and girth capable of introducing the desired new technologies which will benefit the area more generally. It has been designed and sited to minimise its impact as far as possible and it is believed that the proposed installation will not have an undue impact upon the amenity of the area. Whilst there will be some visual impact it is not considered that the impact will be so great as to warrant the refusal of planning permission. Furthermore, no suitable alternatives exist and the re-use of an existing site is the preferred solution. The mast has been specifically designed for the site in question, taking into account site specific characteristics as highlighted above.

In all these circumstances it is contended that the proposed development complies with the aims and objectives of LP 33 and accordingly planning permission should be granted.

## **CONCLUSION**

There is a requirement for EE and H3G to provide advanced telecommunications technologies to this urban area in Twickenham. Network planners have identified a need for an upgraded installation and the proposed development will address this identified need and continued customer demands.

National planning policy is to facilitate the growth of new and existing telecommunications systems, and operators have obligations to meet customer demands for improved quality of service. This application explains the technical need for the installation to provide improved customer service.

In terms of siting and design, it is considered that the proposal responds well to the character and appearance of the local environment and will not have an unacceptable adverse impact on the application site or the surrounding area. The design is of a high standard, and will not detract significantly from the existing visual and environmental character of the area. The benefits to residents and visitors to the area, by the introduction of 5G technologies to the area far outweigh any



potential perceived negative impacts. In all these circumstances it is concluded that there no policy or other objections that would warrant the refusal of planning permission and accordingly permission should be granted for the proposed development.

**Contact Details**

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<b>Operators</b>	<b>EE Ltd &amp; H3G</b>	<b>Fax no</b>	<b>N/a</b>
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<b>Signed</b>	<b>J.Allen</b>	<b>Date</b>	<b>28/02/2020</b>
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<b>Position</b>	<b>Town Planner</b>	<b>Company</b>	<b>For and on behalf of MBNL, EE Ltd &amp; H3G (UK) Ltd</b>
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