

Application reference: 21/3285/TEL FULWELL, HAMPTON HILL WARD

Date application received	Date made valid	Target report date	8 Week date
20.09.2021	20.09.2021	14.11.2021	14.11.2021

Site:

Telecommunications Apparatus Junction Of High St Hampton And, Uxbridge Road, Hampton,

Proposal:

Installation of a new monopole 20m in height supporting 6 no. antennas with a wrap around equipment cabinet at the base of the column, installation of 3 no. new equipment cabinets and ancillary development thereto.

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

APPLICANT NAME

CK Hutchison Networks (UK) Ltd
C/O AGENT
C/O AGENT
C/O AGENT
C/O AGENT
C/O AGENT

AGENT NAME

DC Site Notice: printed on 29.09.2021 and posted on 08.10.2021 and due to expire on 29.10.2021

Consultations:

Internal/External:

Consultee

LBRuT Trees Preservation Officer (North)
14D Urban D
LBRUT Transport

Expiry Date

28.10.2021
28.10.2021
13.10.2021

Neighbours:

7 High Street, Hampton Hill, TW12 1NB, - 29.09.2021
3A High Street, Hampton Hill, TW12 1NB, - 29.09.2021
3 High Street, Hampton Hill, TW12 1NB, - 29.09.2021
5 High Street, Hampton Hill, TW12 1NB, - 29.09.2021
1 High Street, Hampton Hill, Hampton, TW12 1NA, - 29.09.2021
5 Howard Close, Hampton, TW12 2UB, - 29.09.2021
3 Howard Close, Hampton, TW12 2UB, - 29.09.2021
7 Howard Close, Hampton, TW12 2UB, - 29.09.2021
1 Howard Close, Hampton, TW12 2UB, - 29.09.2021
26 Warwick Close, Hampton, TW12 2TZ, -
24 Warwick Close, Hampton, TW12 2TZ, - 29.09.2021
25 Warwick Close, Hampton, TW12 2TZ, - 29.09.2021
18 Warwick Close, Hampton, TW12 2TZ -
,, -
2 Uxbridge Road, Hampton, TW12 3AB -
19 Warwick Close, Hampton, TW12 2TZ -
4 Greenwood Lane, Hampton Hill, TW12 1QT -
5 Ormond Drive, Hampton, TW12 2TP -
19 Howard Close, Hampton, TW12 2UB -
66 High Street, Hampton, TW12 2SJ -

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

Development Management

Status: PDE Application: 21/3285/TEL
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Date: Installation of a new monopole 20m in height supporting 6 no. antennas with a wrap around equipment cabinet at the base of the column, installation of 3 no. new equipment cabinets and ancillary development thereto.

Recommendation:

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 (which are not on the file) YES NO

This application has representations on file YES NO

Case Officer (Initials): JSI

Dated: 04/11/2021

I agree the recommendation: CTA

Team Leader/Head of Development Management/Principal Planner

Dated:04/11/2021.....

This application has been subject to representations that are contrary to the officer recommendation. 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:

REASONS:
CONDITIONS:
INFORMATIVES:
UDP POLICIES:
OTHER POLICIES:

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

INFORMATIVES

U0055893	NPPF Paras 38-42 Refusal
U0055894	Decision Drawings

Site address: **Telecommunications Apparatus Junction of High Street Hampton and Uxbridge Road Hampton**

Proposal:

The application has been made under Part 16, Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2018 (as amended) ('the GPDO'). The application is to determine whether the Prior Approval of the Local Planning Authority is required as to the siting and appearance of the following: *'Installation of a new monopole 20m in height supporting 6 no. antennas with a wrap around equipment cabinet at the base of the column, installation of 3 no. new equipment cabinets and ancillary development thereto'* at Junction of High Street Hampton and Uxbridge Road Hampton.

The proposed monopole and apparatus would be 20m in height with a pole width of 0.4m at its narrowest and 0.5m at its widest point, increasing to 0.8m at the head mast and a maximum of 1.7m accounting for all mast equipment. Associated cabinetry comprises H3G transmission cabinet, H3G Ericsson 6130 equipment cabinet, H3G Commscope Bowler cabinet and H3G wrap-around cabinet around the base of the pole, all to be installed on new root foundation.

Site:

The application site relates to the public footway of the east side Hampton High Street at the junction with Uxbridge Road, Fulwell and Hampton ward. The site is within the CA38 High Street Hampton Hill Conservation Area and directly adjacent to the CA61 Bushy Park Conservation Area to the east. The site is not listed but there are a number of Buildings of Townscape Merit (BTMs) in the area, the closest being No. 1 High Street 50m north. The site is located in Area 4 (High Street Hampton Hill) of the Hampton Hill Village Planning Guidance.

The site immediately adjoins Longford River to the north which is designated Metropolitan Open Land (MOL) and Public Open Space. Directly opposite the site to the east is Bushy Park which is a Grade I Listed Historical Garden which is also MOL, a Site of Special Scientific Interest (SSSI) and Other Site of Nature Importance (OSNI). The boundary wall of this park is Grade II Listed.

Relevant planning history:

Opposite 237 Uxbridge Road, Hampton Hill

- 02/0105 – Erection Of A 10m High Street Furniture Column And Equipment Housing. – Approved 20/03/2002

Land Adj 131 Uxbridge Road, Hampton Hill

- 02/1223 – Installation Of A 10 Metre High Telegraph Pole Monopole, With Shrouded Omni Antenna And A Single Ground Based Cabinet, Both Located Within The Grass Verge Adjacent To Pavement. – Approved 13/06/2002

Pavement At Junction With High Street, Uxbridge Road Hampton

- 02/3245 – Installation Of A 12m High Slimline Monopole Incorporating 3 1.7m Antennae And Associated Equipment Cabinet. – Refused 22/05/2003

Reason(s) for refusal:

1. *The proposed monopole, antennae and associated equipment, by reason of its siting, size, height and design, would represent a visually obtrusive form of development detrimental to the character and appearance of High Street Hampton Hill Conservation Area, the adjacent Metropolitan Open Land and Bushy Park Conservation Area and the setting of the adjacent Grade I registered Historic Park. The proposal is therefore contrary to policies ENV 3, 10, 12, 19 and 31 of the*

adopted Unitary Development Plan and policies BLT2, 11 and 24, also policy ENV 10 of the Unitary Development Plan – First Review.

Opposite 237 Uxbridge Road, Hampton

- 04/0153/TEL – Erection Of 15m High Mobile Phone Antennae Mast. 2no. Equipment Cabins And Ancillary Development. – Refused 02/03/2004

Reason(s) for refusal:

1. *This Council considers that it is necessary for it to consider the siting and appearance of the proposed installation and having done so refuses permission for the following reasons:-*

The proposed column by reason of its design, height and location would be a visually intrusive form of development detrimental to the visual and residential amenity of the area and the setting of adjacent Metropolitan Open Land and Public Open Space. The proposal would thereby be contrary to policies ENV 3, 5, 19, 24 and 31 of the adopted Unitary Development Plan and 1, 11, BLT 11, 16 and 24 of the Emerging Unitary Development Plan First Review.

Pavement At Junction With High Street, Uxbridge Road Hampton Hill

- 04/1027/FUL – Erection Of 12 Metre High Ultra Slimline Monopole Supporting Three Antennas With Radio Equipment. – Refused 08/06/2004 – Allowed on Appeal 18/04/2005

Reason(s) for refusal:

1. *The proposed monopole, antennae and associated equipment cabinet, by reason of its siting, size, height and design, would represent a visually obtrusive form of development detrimental to the character and appearance of High Street Hampton Hill Conservation Area, the adjacent Metropolitan Open Land and Bushy Park Conservation Area and the setting of the adjacent Grade I Registered Historic Park. The proposal is thereby contrary to policies ENV3, ENV10, ENV12, ENV19 and ENV31 of the Adopted Unitary Development Plan and policies ENV1, ENV10, BLT2, BLT11 and BLT24 of the Unitary Development Plan: First Review.*

Appeal Decision Ref. APP/L5810/A/04/1157211 – Allowed 18/04/2005

In his Appeal Decision the Planning Inspector the Planning Inspector made the relevant key points:

- Main issues to be the effect on: i) the streetscene and character and appearance of High Street Hampton Hill Conservation Area; ii) the adjacent MOL; and iii) Bushy Park Conservation Area and Grade I Historic Park.
 - The ultra slimline mast would be similar in height and design to the streetlights in the vicinity.
 - Whilst the appeal site is located on a busy junction, it is well screened on the approaches from the north and west by trees.
 - From the south it would be seen in the context of the existing street lights and other street furniture against a background of trees and vegetation.
 - From the parkland to the east the equipment cabinet and lower part of the mast would be screened by the boundary wall and upper parts of the mast would be partially screened by trees within the park and where it could be seen from the park it would be in the context of the existing street lights and against a background of trees.
- 04/1027/DD01 – Details of condition 2 (colour of mast to be painted Holly Green). – Approved 10/06/2005

- 06/3784/MOB – Erection Of 11.42 metre high slimline 'streetworks' pole, incorporating three shrouded antennas, including equipment cabinet and ancillary development thereto. – Refused 02/01/2007 – Appeal Dismissed 05/12/2007

Reason(s) for refusal:

1. *The proposed column and antenna and equipment cabinets by reason of their height, siting and design, would introduce further street clutter and would be visually obtrusive and detrimental to the character and appearance of the Conservation Area, and the adjoining Metropolitan Open Land and Public Open Space. The proposal would therefore be contrary to Policies ENV 1 and 11 and BLT 2 and 24 of the London Borough of Richmond Upon Thames Unitary Development Plan First Review.*

Appeal Decision Ref. APP/L5810/A/07/2048282 – Dismissed 05/12/2007

In their Appeal Decision the Planning Inspector the Planning Inspector upheld the Council's reason for refusal though also made the following key comments:

- Would not have a significant visual impact on the adjoining MOL due to the distance that it would be sited from it.
- do not consider that the need for the installation and the absence of a suitable alternative site are sufficient in this instance to outweigh the significantly harmful effects that I have identified

Telecom Cabinet Opposite 1 Howard Close Hampton

- 11/1335/TEL – Installation of broadband cabinet (PCP022). – Refused 10/06/2011

Reason(s) for refusal:

1. *The Council considers that it is necessary for it to consider the design and location of the proposed installation and having done so refuses permission for the following reasons: The proposed equipment cabinet, by reason of its height and prominent location would be harmful to the character and appearance of the High Street Hampton Hill Conservation Area, the adjacent Metropolitan Open Land and Public Open Space. The proposal would consequently be contrary to policies ENV 1 and 11 and BLT 2 and 24 of the Richmond upon Thames Unitary Development Plan First Review and DM OS 2, OS 6 and HD 1 of the emerging Local Development Framework Development Management Plan.*

Telecommunications Mast 36806VF Corner Junction Of Uxbridge Road And High Street Hampton Hill

- 15/0456/MOB – Radio base station comprising 25m Monopole with dual stacked antennas within shroud between 20 and 25m, 4 equipment cabinets and 1 slim line meter pillar. Located on wide area of footway at junction of High Street and Uxbridge Road, High Street, Hampton, TW12 1NA. – Refused 26/03/2015

Reason(s) for refusal:

1. *The proposed monopole, by reason of its design, siting, excessive and dominating scale and height and the siting and number of proposed equipment cabinets, in conjunction with existing equipment in this prominent and sensitive location within a Conservation Area and adjoining and opposite Metropolitan Open Land and Public Open Space, would result in excessive street clutter and appear visually intrusive causing unacceptable harm and failing to at least preserve the character and appearance of the area. As such, the proposal is contrary to the National Planning Policy Framework; the London Borough of Richmond upon Thames' Local Plan with*

particular regard to policies DM OS 1, DM OS 6, DH HD 1, and DM DC 1 of the Development Management Plan (2011); CP7 of the Core Strategy and the council's Public Space Design Guide.

Material representations:

Neighbour consultation

Notification letters were sent to 16 neighbouring properties, a publication was printed in the Richmond and Twickenham Times and a site notice was displayed in the area. Formal neighbour consultation closed 29/10/2021. To date, 10 letters of **objection** have been received. Below is a summary of concerns raised, followed by a brief officer response.

Neighbour comment	Officer response
<i>Design and appearance</i>	
Height / bulk / siting	The impact of the proposal on the character and appearance of the area is considered in the 'Character and Appearance' section of the report.
Impact on conservation area / Listed Buildings	
Visual clutter	
Impact on Bushy Park	
Does not overcome previous reasons for refusal	
<i>Health concerns</i>	
Long-term health impacts	Para. 116 of the National Planning Policy Framework (NPPF) (2019) states: ' <i>Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.</i> '
Proximity to area frequented regularly by people and school children	
<i>Alternative site / Need for the development</i>	
Use of alternative sites/existing buildings not adequately explored	Para. 114 (b) of the NPPF states that applicants must ensure that ' <i>they have considered the possibility of the construction of new buildings or other structures interfering with broadcast and electronic communications services</i> '. Para. 116 of the NPPF states: ' <i>Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.</i> '
	These issues are considered in further detail in the assessment body of the report.

<i>Other matters</i>	
Proximity to residential homes	There is no policy requirement for telecoms equipment to be sited outside of residential areas.
Impact on SSSI	There is no policy mechanism for an application of this nature to allow Local Planning Authorities to assess the ecological impact of the proposed works, other than the development's siting with regards to impact on trees and the resulting character of the area. This is considered in the main body of the assessment below.

A letter of objection has been received on behalf of The Hampton Society, which raises the following points:

- Unightly / impact on conservation area
- Inappropriate siting
- Detrimental impact on streetscene
- Siting close to Bushy Park
- More suitable locations near the railway / encourage dialogue between applicant and Network Rail

Elected representatives

A call-in request has been received from Councillor Gareth Roberts, ward councillor for Hampton ward and Leader of Richmond Councillor, which raise the following material planning considerations:

- Reasons for refusal of previous/similar schemes equally apply
- Overbearing presence on the streetscene
- Impact on conservation area and Bushy Park

Internal consultees

- Transport Officer – Objection
- Trees Officer – Objection
- Urban Design – Objection

Internal colleagues' comments are incorporated into the main body of the assessment.

Planning policies:

The application has been made under Part 16, Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2018 (as amended) ('the GPDO'). The following NPPF and Local Development Plans are also relevant:

National Planning Policy Framework (NPPF) (2019)

- Chapter 10 Supporting High Quality Communications

Local Plan (2020):

- Policy LP1 Local Character and Design Quality
- Policy LP3 Designated Heritage Assets
- Policy LP4 Non-Designated Heritage Assets
- Policy LP5 Views and Vistas
- Policy LP13 Green Belt, Metropolitan Open Land and Local Green Space
- Policy LP14 Other Open Land of Townscape Importance

- Policy LP16 Trees, Woodlands and Landscape
- Policy LP18 River Corridors
- Policy LP33 Telecommunications
- Policy LP44 Sustainable Travel Choices

Supplementary Planning Documents (SPDs)

- Buildings of Townscape Merit (May 2015)
- Design Quality (February 2006)
- Hampton Hill Village Planning Guidance SPD (June 2017)
- Telecommunications Equipment SPD (June 2006)

Conservation Area Statements

- CA38 High Street Hampton Hill Conservation Area
- CA61 Bushy Park Conservation Area

Professional comments:

The installation of the tele mast and equipment constitutes permitted development provided that the operators comply with the relevant conditions set out within the GPDO, including giving the Local Planning Authority the opportunity to consider the siting and appearance of the apparatus, as procedure commonly referred to as Prior Approval. The Prior Approval procedure means that the principle of development is not an issue.

Guidance within Chapter 10 Paras. 112 to 116 in the NPPF is also relevant.

Para. 114 states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. 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. Policies should set out how high-quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).

Para. 115 advises that 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.

Para 116 states that 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.

The guidance goes on to state that Councils should ensure that applicants:

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

Para 117 states that applications for electronic communications development (including applications for Prior Approval under the GPDO) should be supported by the necessary evidence to justify the proposed development. This should include:

- a) the outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed near a school or college, or within a statutory safeguarding zone surrounding an aerodrome, technical site or military explosives storage area; and
- b) for an addition to an existing mast or base station, a statement that self-certifies that the cumulative exposure, when operational, will not exceed International Commission guidelines on non-ionising radiation protection; or
- c) for a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure 34 and a statement that self-certifies that, when operational, International Commission guidelines will be met.

Finally, Para 118 states that Local Planning Authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.

Local Plan Policy LP33 'Telecommunications' 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 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 proposal should be minimised, in line with Policy LP1 'Local Character and Design Quality', particularly on rooftops;
3. The applicant has demonstrated that the development will operate within the ICNIRP guidelines for public exposure.

What follows is an assessment of the application against the relevant policies and guidance above.

Para. 115 NPPF – Number of electronic communications equipment

Supplementary information submitted with the application fails to adequately explain why existing monopoles cannot either be shared, upgraded and/or replaced. Further, no justification has been provided as to why, should an additional mast be required, it cannot be placed on top of an existing building, such as those associated with the nearby railway service. The supplementary information lists alternative sites that were considered and discounted; however, mostly seem to be discounted on account of the location being too prominent and/or for highway safety reasons. Given that the proposed application site is a highly prominent location and that it also poses highways safety concerns, it is therefore not adequately justified as to why this siting has been chosen over others.

Notwithstanding and regardless of the above, it is not considered that the proposed works have been sympathetically designed so as to minimise their visual impact.

The application is therefore considered to fail to comply with Para. 115 of the NPPF.

Para. 117 NPPF – Interference with other equipment and services

The proposed works are not located near nationally important equipment and/or services which could be impacted by the telecoms equipment. The application is therefore considered to comply with Para. 117 of the NPPF.

Para 117 (a) NPPF – Consultation

The applicant has confirmed that letters of notification were sent to the Hamptons Day Nursery and Ivytree Nursery, as well as the three ward councillors, local MP and London Assembly Member. The application therefore is considered to comply with Para 117 (a) of the NPPF.

Para 117 (b) and (c) NPPF – International Commissions guidelines compliance

An International Commission on Non-Ionizing Radiation Protection Declaration (ICNIRP) has been submitted as part of the application. The application is therefore considered to comply with Para. 117 (a) and (b) of the NPPF.

Character, appearance and design

The statutory duty in Section 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act 1990') requires that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

The NPPF paras. 194 to 208 set out the statutory duties of the decision-making when assessing proposals which affect heritage assets. Para. 199 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Para. 202 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. Para. 203 states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application.

Local Plan Policy LP1 (Local Character and Design Quality) Part A states that 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 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.

Local Plan Policy LP3 (Designated Heritage Assets) Part A states that the Council will require development to conserve and, where possible, take opportunities to make a positive contribution to, the historic environment of the borough. Development proposals likely to adversely affect the significance of heritage assets will be assessed against the requirement to seek to avoid harm and the justification for the proposal. The significance (including the settings) of the borough's designated heritage assets, encompassing Conservation Areas, listed buildings, Scheduled Monuments as well as the Registered Historic Parks and Gardens, will be conserved and enhanced.

Local Plan Policy LP4 (Non-Designated Heritage Assets) states that the Council will seek to preserve, and where possible enhance, the significance, character and setting of non-designated heritage assets, including Buildings of Townscape Merit, memorials, particularly war memorials, and other local historic features.

Local Plan Policy LP5 (Views and Vistas) states that 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.

Local Plan Policy LP13 (Green Belt, Metropolitan Open Land and Local Green Space) states that when considering developments on sites outside MOL, any possible visual impacts on the character and openness of the MOL will be taken into account.

Local Plan Policy LP14 (Other Open Land of Townscape Importance) states that when considering developments on sites outside designated open land, any possible visual impacts on the character and openness of the OOLTI will be taken into account.

Local Plan Policy LP18 (River Corridors) Part A states that the natural, historic and built environment of the River Thames corridor and various watercourses in the borough, including the River Crane, Beverley Brook, Duke of Northumberland, Longford River and Whitton Brook, will be protected. Development adjacent to the river corridors will be expected to contribute to improvements and enhancements to the river environment.

The application site is located in CA38 High Street Hampton Hill Conservation Area and is directly adjacent to CA61 Bushy Park Conservation Area. The CA38 Statement summarises the character of the High Street Hampton Hill Conservation Area as follows:

'High Street (Hampton Hill) conservation area forms the busy centre of Hampton Hill and the historic core of the original linear settlement. It is a largely commercial and residential area that also retains a distinctive traditional village high street character. It retains many fine original shopfronts including a number of remarkable single storey shop units built on the frontage of former houses. The area is defined by the listed high brick walls of Bushy Park to the East and areas of later terraced housing along the railway to the West. The Pantile Bridge crossing the Longford River forms the south gateway to the high street. Here an important green space with rustic timber shelter at the junction with Uxbridge Road and the low wall to Bushy Park allowing wide open views into the park, are in contrast to the enclosed character of the high street to the North. The North gateway is less clear, marked by the transition to a more compact and smaller scale high street. The listed early 19th century No.167 and the opposing former engineering works in distinctive polychrome brickwork (no.92) frame this gateway. High Street is enclosed by closely packed predominantly two storey Victorian buildings occupying traditional

long narrow plots. Some of the plots fronting the High Street still retain historic workshops behind, such as rear of 183 High Street which is accessed off a historic laneway from Park Road. The rear of properties along the High Street are particularly important with historic laneways still in existence and the historic character of activity to the rear of buildings fronting the High Street contributing to the character of the public realm and are still relatively architecturally authentic today. This allows a series of views North and South along this wide and gently curving street with glimpses up narrow streets and laneways between properties which add further interest to the street scene.

The conservation area was extended to include further commercial development along the High Street along with high quality residential development which lead off the High Street that are also important for the contribution they make to the organic development of the area. The 1970's High Street development is included, however is considered to make a neutral contribution. The dwellings along Park Road (a historic main thoroughfare) are constructed with status and fine detailing in their design and massing, whereas a smaller and still affluent group of dwellings exist along Edward Road. Materials found throughout the area are predominately yellow stock brickwork with red brick dressings and timber sliding sash windows. Other buildings are either painted or rendered, all in a variety of architectural styles. The roofscape is characterised by mostly shallow pitched slate roofs with brick chimneys, all providing unity rhythm and interest to the street. The wider landscape setting of Bushy Park and the backdrop of mature trees contribute to the enclosure and distinctive village character of this area.' (emphasis added)

The lack of coordination and poor quality of street furniture, pavements and street trees, and domination of traffic and poor pedestrian safety leading to clutter of signage and street furniture, are both identified problems and pressures in the area.

All of the above is reiterated in the Hampton Hill Village Planning Guidance, which also stresses the importance of the wider landscape setting of Bushy Park, and states:

'The Bushy Park boundary provides an almost continuous line of mature trees whose canopies extend above the roof line of the High Street properties. They accentuate the linear form of the High Street and contribute to the enclosure and distinctive village character of this area.'

The CA61 Statement summarises the character of the Bushy Park Conservation Area thus:

The conservation area consists of 44 hectares of well cared for historic parkland. It is listed as Grade I on English Heritage's Register of Historic Parks and Gardens, and contains an ancient monument (the Brew House c1710) the Longford River is of recognised archaeological importance. The park contains the Royal Paddocks. One of the main landscape features is Chestnut Avenue created by George London in 1698 under William III. The Diana Fountain was moved there by Queen Anne in 1701.

Its topography and historical importance combine to create its unique character. The grandeur of its open scale and formal avenues of mature trees reflect the park's other function in forming the setting and approach to Hampton Court Palace. Otherwise open parkland is interspersed with interesting water features, such as the Diana Basin and Longford River, planned minor avenues of trees and woodland enclosures.

Views are an integral part of this landscape, often terminating in important buildings both inside and outside Bushy Park. The north/south and east/west vistas are identified in the UDP but other views are also important in terms of the setting of listed buildings in the park. The existence of trees beyond the boundary of the Park is important in contributing to a sense of the landscape continuing beyond its well-defined and historic boundaries. Trees are also important in screening wartime Ministry of Defence buildings.

The listed buildings in the Park belong to the 18th century and play an important role in contributing to its character as an historic park. Bushy House, built in the reign of George II, and Upper Lodge both retain vestiges of their former settings while the 18th century buildings along the southern boundary reflect historical development and provide a sense of enclosure, reinforced by the listed 16th century walls which provide a clear definition to the conservation area itself.

Development pressure is identified to be those which may harm the balance of the landscape-dominated setting, and the obstruction or spoiling of views, skylines and landmarks.

Turning to the application, this proposes a new monopole which is considered to be of an excessive height that would tower above all existing neighbouring structures nearby, including streetlamps and trees. The supporting antenna would exacerbate this visual dominance by creating unacceptable bulk at the very-most visible part of the pole. Far from being screened by existing adjacent trees, the fact that the telemast would be much taller, and would also introduce a modern, industrial design to this conspicuous siting, which is completely out of character with the green, open feel of the locality. Furthermore, the application fails to demonstrate that these trees would be protected during the course of both construction and the lifetime of the development (assessed in more detail below). This green, open feel is considered to be a key contribution the High Street Hampton Hill conservation area, whose character and appearance would be harmed. The excessive combined height, width, bulk and scale and inappropriate design of the proposal would be visible in many of the local views in the area, and would catch the eye and draw it upwards, including from Longford River and the nearest periphery of Bushy Park, thus causing harm to the character and openness of the MOL, OOLTI and the setting of Bushy Park Conservation Area, the Historic Grade I Registered Park and the Grade II Listed park boundary wall. Furthermore, the associated cabinets would introduce urban detritus in a location which has a semi-rural character which reads as an extension of the Bushy Park and Longford River character.

The Council's Urban Design Officer has been consulted on the proposal and raises an in principle objection to the application for the reasons highlighted above.

It is not considered that this identified harm would be outweighed by any public or heritage benefit. Consequently, the application fails to comply with Sections 66 and 70 of the Act 1990, Paras. 115 and 202 of the NPPF (2021), and policies within the Local Plan (2018), in particular, LP1, LP3, LP5, LP13, LP14, LP16, LP18 and LP33, and the following Supplementary Planning Documents and other guidance: Design Quality (February 2006), Hampton Hill Village Planning Guidance SPD (June 2017), Telecommunications Equipment SPD (June 2006), CA38 High Street Hampton Hill Conservation Area Statement, CA61 Bushy Park Conservation Area Statement.

Trees and landscaping

Local Plan Policy LP16 (Trees Woodlands and Landscape) states that the Council will (inter alia):

2. Resist development which results in the damage or loss of trees that are considered to be of townscape or amenity value; the Council will require that site design or layout ensures a harmonious relationship between trees and their surroundings and will resist development which will be likely to result in pressure to significantly prune or remove trees.

and

5. Require that trees are adequately protected throughout the course of development, in accordance with British Standard 5837 (Trees in relation to design, demolition and construction-Recommendations).

The Council's Trees Officer has been consulted on the application and has advised that an important group of established and mature trees is situated to the north of the proposed 20m 5G mast within the Pantile Bridge Open space. These are significant trees in the local landscape both visually and as habitat provision for bats and birds using the Longford river corridor linking to adjacent Bushy park SSSI. In addition, an understorey of trees sits alongside the Longford river as secondary importance and backdrop to the amenity trees within the open space. These trees are protected by the CA38 High Street Hampton Hill Conservation Area.

Neither a BS5837:2012 tree survey or Arboricultural Impact Assessment have been submitted with the application. The submitted documentation is thus insufficient for the purposes of assessing the impact of construction activities on the trees on site and does not provide any corresponding tree survey data that can be independently verified by the Council as part of the application process.

The Council's Trees Officer advises that the proposed pole and ancillary boxes and connectivity links are outside of any direct rooting area and so direct root damage is not readily foreseen. However, a young Chestnut tree is close to the pole's proposed position and has not been accounted for.

Further, the proposed mast must account for tree proximity, size and growth and ensure that there is sufficient clearance from and height above surrounding trees and vegetation to maintain "Line Of Sight" (LOS) for telecommunications equipment that requires it. Insufficient documentation has been submitted to assess how trees (including any remote from site) will be impacted upon telecommunications equipment added to the mast, both present and future, that require LOS to function.

The positioning of the mast will likely necessitate the height between nearby trees and the proposed mast to be managed by pruning as the trees grow. Such enforced proximity will necessitate an increase in the frequency of pruning to maintain the reduced height for LOS and clearance between the mast and the trees. Consequently, future tree maintenance regimes and cycles need to be considered in relation to the impact on these trees and the burden placed upon the landowners.

There is also an increased risk that such a reduction in proximity will lead to an increase in post-development pressure on affected trees for their significant reduction or eventual removal. It must be stipulated that any such future requests for heavy reduction and/or tree removal for these reasons will be strongly resisted.

The Council's Trees Officer consequently objects to the application in its current form in accordance with Local Plan (2018) Policy LP16, subsection 5 and pursuant to section 197 of the Town and Country Planning Act 1990.

Transport

Policy LP44 of the Local Plan states that the Council will work in partnership to promote safe, sustainable and accessible transport solutions, which minimise the impacts of development including in relation to congestion, air pollution and carbon dioxide emissions, and maximise opportunities for health benefits and providing access to services, facilities and employment. The Council will ensure that new development does not have a severe impact on the operation, safety or accessibility to the local or strategic highway networks.

The Council's Principle Transport Planner has been consulted on the application and raises an objection to its siting, on the grounds that the proposed H3G Transmission cabinet would be positioned just 0.6m north of tactile paving that is used to help guide blind and partially sighted pedestrians that are walking in a northerly direction having crossed the carriageway on the A312 Uxbridge Road. This will increase the risk of blind and partially sighted pedestrians colliding with this cabinet, which should be placed at least 1.2m north of the tactile paving to give them appropriate footway space to walk around it. The application, by virtue of its unacceptable siting, is considered to be detrimental to pedestrian and highways safety and as such, fails to accord with Policy LP44 of the Local Plan (2018) Hampton Hill Village Planning Guidance SPD (June 2017) and CA38 High Street Hampton Conservation Area Statement, the latter two of which specifically site the lack of coordination and poor quality of street furniture, pavements and street trees, and domination of traffic and poor pedestrian safety leading to clutter of signage and street furniture, as being identified problems and pressures in the area.

Conclusion

In light of the above, by virtue of its combined inappropriate design, excessive height, width, bulk and conspicuous siting and failure to demonstrate the protection of visually important trees, the application is considered to result in a visually prominent, incongruous and overbearing form of development which would cause unacceptable harm to the character and appearance of the CA38 High Street Hampton Hill Conservation Area and the setting of the CA61 Bushy Park Conservation Area Bushy Park, Historic Grade I Registered Bushy Park, Grade II Listed Bushy Park boundary wall, the character of the Longford River and to the openness and character of the adjacent MOL and OOLTI. As such, the application fails to comply with Sections 66 and 70 of the Act 1990, Paras. 115 and 202 of the NPPF (2021), and policies within the Local Plan (2018), in particular, LP1, LP3, LP5, LP13, LP14, LP16, LP18 and LP33, and the following Supplementary Planning Documents and other guidance: Design Quality (February 2006), Hampton Hill Village Planning Guidance SPD (June 2017), Telecommunications Equipment SPD (June 2006), CA38 High Street Hampton Hill Conservation Area Statement, CA61 Bushy Park Conservation Area Statement.

Furthermore, by virtue of its unacceptable siting, the proposed works would obstruct a tactile paved section of a public pavement, to the detriment of pedestrians who are blind or partially sighted and overall public and highways safety. As such, the application fails to accord with Policy LP44 of the Local Plan (2018), the Telecommunications Equipment SPD (June 2006) and the Hampton Hill Village Planning Guidance SPD (June 2017) and CA38 High Street Hampton Conservation Area Statement.

Finally, it is not considered that the application has sufficiently demonstrated the need for a tele communications pole and associated equipment in this location by virtue of the inadequate information provided to demonstrate that alternative sites have been explored. As such, it is considered that the application fails to comply with outcomes sought in Para. 115 of the NPPF, Policy LP33 of the Local Plan (2018) and the Telecommunications Equipment SPD (June 2006).

Recommendation: Prior Approval is REQUIRED and REFUSED

