

Application reference: 22/1578/TEL WEST TWICKENHAM WARD

Date application received	Date made valid	Target report date	8 Week date
17.05.2022	17.05.2022	11.07.2022	11.07.2022

Site:

Telecommunications Apparatus Land Near, 500 Chertsey Road, Twickenham,

Proposal:

Installation of a new 15m monopole tower to support antenna, associated radio-equipment housing and ancillary development hitherto.

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

APPLICANT NAME

Hutchison 3G UK Limited
450 Longwater Avenue
Green Park
Reading
RG2 6GF
United Kingdom

AGENT NAME

Mr Rory Hollings
4 Bredon Court,
Brockridge Park
Twyning
Twyning
GL20 6FF
United Kingdom

DC Site Notice: printed on 23.05.2022 and posted on 03.06.2022 and due to expire on 24.06.2022

Consultations:

Internal/External:

Consultee

LBRuT Ecology
LBRUT Transport
LBRuT Trees Preservation Officer (North)

Expiry Date

07.07.2022
06.06.2022
06.06.2022

Neighbours:

„ -
36 Selkirk Road, Twickenham, TW2 6PX -
9 Ross Road, Twickenham, TW2 6JR -
81 Selkirk Road, Twickenham, TW2 6PT -
55 Selkirk Road, Twickenham, TW2 6PS -
242 Lincoln Avenue, Twickenham, TW2 6NN -
119 Selkirk Road, Twickenham, TW2 6PT -
78 Selkirk Road, Twickenham, TW2 6PU -
42 Ross Road, Twickenham, TW2 6JR -
43 Spencer Road, Twickenham, TW2 5TG -
96 Selkirk Road, Twickenham, TW2 6PU -
468C Chertsey Road, Twickenham, TW2 6LR -
358, 358 Nelson Road, Whitton, Tw2 7ah -
508 Chertsey Road, Twickenham, TW2 6LR -
117 Selkirk Road, Twickenham, TW2 6PT -
47 Selkirk Road, Twickenham, TW2 6PS -
83 Selkirk Road, Twickenham, TW2 6PT -
480 Chertsey Road, Twickenham, TW2 6LR -
35 Ross Road, Twickenham, TW2 6JR -
43 Ross Road, Twickenham, TW2 6JR -
61 Selkirk Road, Twickenham, TW2 6PS -
103 Meadway, Twickenham, Tw26pl -

88 Selkirk Road, Twickenham, TW2 6PU -
82 Selkirk Road, Twickenham, TW2 6PU -
20 Ross Road, Twickenham, TW2 6JR, - 23.05.2022
17 Ross Road, Twickenham, TW2 6JR, - 23.05.2022
15 Ross Road, Twickenham, TW2 6JR, -
12 Ross Road, Twickenham, TW2 6JR, - 23.05.2022
19 Ross Road, Twickenham, TW2 6JR, - 23.05.2022
18 Ross Road, Twickenham, TW2 6JR, - 23.05.2022
16 Ross Road, Twickenham, TW2 6JR, - 23.05.2022
14 Ross Road, Twickenham, TW2 6JR, - 23.05.2022
13 Ross Road, Twickenham, TW2 6JR, - 23.05.2022
11 Ross Road, Twickenham, TW2 6JR, - 23.05.2022
498 Chertsey Road, Twickenham, TW2 6LR, - 23.05.2022
70 Selkirk Road, Twickenham, TW2 6PU, - 23.05.2022
56B Selkirk Road, Twickenham, TW2 6PX, - 23.05.2022
494 Chertsey Road, Twickenham, TW2 6LR, - 23.05.2022
488 Chertsey Road, Twickenham, TW2 6LR, - 23.05.2022
72 Selkirk Road, Twickenham, TW2 6PU, - 23.05.2022
64 Selkirk Road, Twickenham, TW2 6PU, - 23.05.2022
62 Selkirk Road, Twickenham, TW2 6PU, - 23.05.2022
60 Selkirk Road, Twickenham, TW2 6PU, - 23.05.2022
56A Selkirk Road, Twickenham, TW2 6PX, - 23.05.2022
48 Selkirk Road, Twickenham, TW2 6PX, - 23.05.2022
46 Selkirk Road, Twickenham, TW2 6PX, - 23.05.2022
68 Selkirk Road, Twickenham, TW2 6PU, - 23.05.2022
66 Selkirk Road, Twickenham, TW2 6PU, - 23.05.2022
58 Selkirk Road, Twickenham, TW2 6PU, - 23.05.2022
56 Selkirk Road, Twickenham, TW2 6PX, - 23.05.2022
54 Selkirk Road, Twickenham, TW2 6PX, -
52 Selkirk Road, Twickenham, TW2 6PX, - 23.05.2022
50 Selkirk Road, Twickenham, TW2 6PX, - 23.05.2022
44 Selkirk Road, Twickenham, TW2 6PX, - 23.05.2022
502 Chertsey Road, Twickenham, TW2 6LR, - 23.05.2022
500 Chertsey Road, Twickenham, TW2 6LR, - 23.05.2022
496 Chertsey Road, Twickenham, TW2 6LR, - 23.05.2022
492 Chertsey Road, Twickenham, TW2 6LR, - 23.05.2022
490 Chertsey Road, Twickenham, TW2 6LR, - 23.05.2022
486 Chertsey Road, Twickenham, TW2 6LR, - 23.05.2022
94 Selkirk Road, Twickenham, TW2 6PU -

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

Development Management

Status: PDE

Application:22/1578/TEL

Date:

Installation of a new 15m monopole tower to support antenna, associated radio-equipment housing and ancillary development hitherto.

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: 08/07/2022

I agree the recommendation: CTA

Team Leader/Head of Development Management/Principal Planner

Dated:08/07/2022.....

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

U0065501	NPPF Paras 38-42
U0065502	Decision Dwgs

Application reference: 22/1578/TEL
Site address: Land near 500 Chertsey Road, Twickenham

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 15m monopole tower to support antenna, associated radio-equipment housing and ancillary development hitherto' at Land near 500 Chertsey Road, Twickenham.*

The application proposes a new 15m telemast pole with antenna within a shroud at the head with wraparound cabinet at ground. Also proposed is AC transmission cabinet, Ericsson 6130 equipment cabinet and Commscope bowler cabinet. Proposed colour scheme would be green.

Site:

The application relates to a section of a public access path running alongside the eastern side of Chertsey Road, West Twickenham ward. This section of the access path is enclosed by bollards at either end and connects two small car parks. Soft landscaping and border planting separate the path from Chertsey Road, including some significantly sized trees, none of which are protected via Tree Protection Order (TPO) though are considered to be visually important. Next to the path to the east is grassed land. Whilst Chertsey Road is a busy red-route of four lanes, the surrounding area is mainly residential in nature with the nearest properties being Nos. 494-500 Chertsey Road (south of the site) and 492-486 Chertsey Road (north of the site), which are pairs of two-storey semi-detached interwar dwellings, and two-storey terraced dwellings fronting Selkirk Road to the east, with all nearest dwellings being located within a 20-45m radius of the site.

There are no listed buildings or Buildings of Townscape Merit to consider and the site is not located in or adjacent to a conservation area. It forms part of Character Area 2 'Lincoln Avenue' of the Twickenham Village Planning Guidance.

Approx. 200m east and south of the site is the River Crane which is designated Metropolitan Open Land (MOL) and an Other Site of Nature Importance (OSNI).

There are no other relevant site constraints to consider.

Relevant planning history:

None.

Amendments:

None.

Other matters:

None.

Material representations:

Neighbour consultation

Letters of notification were posted to 60 neighbouring properties and a site notice was erected in the area. To date, a total of 46 letters of objection have been received. Below is a summary of concerns raised followed by a brief officer response, where appropriate:

Neighbour objection	Officer response
<i>Design, character, appearance</i>	

Incongruity/eyesore	The impact of the proposal on the character and appearance of the area is considered in the 'Character and Appearance' section of the report below
Overbearing	
Height	
Design	
Visual amenities	
Impact on Listed Building and conservation area	There are no Listed Buildings nearby and the site is not in or adjacent to a conservation area.
<i>Neighbour amenities</i>	
Overshadowing	The application is for prior approval under the General Permitted Development Order, which does not allow for the impact on neighbour amenities to be assessed.
Loss of light	
Loss of outlook	
Sound pollution	
Nuisance (noise) from traffic increase	
<i>Ecology, landscaping and trees</i>	
Removal of bushes and trees	The proposal's siting on ecology, landscaping and trees is considered in the 'Impact on the River Crane', 'Biodiversity' and 'Trees and Landscape' sections of the officer assessment below.
Impact on wildlife	
Impact on/loss of green space	
<i>Transport and highways</i>	
Traffic disruption/congestion	The proposal's siting on ecology, landscaping and trees is considered in the 'Impact on the River Crane', 'Biodiversity' and 'Trees and Landscape' sections of the officer assessment below.
Access	
Highways safety	
Restrict emergency vehicles' access	
Impact on deliveries, parking and turning	
<i>Health</i>	
Impact on health / radiation	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> ' Para. 113 states that electronic communications structures should be kept to a minimum. This is considered in further detail in the assessment of the report.
<i>Other matters</i>	
Alternative sites / sharing opportunities	This is considered in the 'NPPF' section of the assessment below.
Need for development	
Council's consultation insufficient	Letters of notification were sent to 60 neighbouring properties and a site notice was erected in the vicinity. Neighbour consultation took place for 21 days. The Council has met its

	statutory duty in this regard.
No prior consultation	There is no statutory requirement for the applicant to consult neighbours.
Interference with domestic wireless appliances	This is addressed in the 'NPPF' section of the assessment below.
Impact on Heathrow Airport	
Impact on Metropolitan Police Air Support unit	
Construction disruption/nuisance	This is a highways matter and not a material consideration. The Council's Transport Planner raises no objection with regards to the proposal's impact on highways safety. This is addressed in the 'Transport and Highways' section of the assessment below.
Maintenance/upgrade disruption/nuisance	
Council restricting reasons for public objections	The Council can only consider neighbour comments which raise a material planning consideration, as set out in the GPDO. This is a national policy matter over which the Council has no control.
<i>Non-material planning considerations</i>	
Private views	These are not material planning considerations.
Private property values	
Increase in air pollution	This is not a consideration which the Council can assessed in the determination of prior approval.

Internal consultees

- *Ecology* – Insufficient information regarding bats
- *Transport* – No objection subject to doors opening northwards
- *Trees* – No in principle objection though further information ideally required regarding protection of trees

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

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 Plan policies are also relevant:

National Planning Policy Framework (NPPF) (2019):

- Chapter 10 Supporting High Quality Communications

London Plan (2021)

- Policy D12 Fire Safety

Local Plan (2020):

- Policy LP1 Local Character and Design Quality
- Policy LP5 Views and Vistas
- Policy LP8 Amenity and Living Conditions
- Policy LP13 Green Belt, Metropolitan Open Land and Local Green Space

- Policy LP15 Biodiversity
- Policy LP16 Trees, Woodland and Landscaping
- Policy LP18 River Corridors
- Policy LP33 Telecommunications
- Policy LP44 Sustainable Travel Choices

Supplementary Planning Documents (SPD) / Guidance:

- Crane Valley SPD (April 2005)
- Design Quality SPD (February 2006)
- Richmond Biodiversity Action Plan
- Telecommunications Equipment SPD (June 2006)
- Twickenham Village Planning Guidance SPD (February 2018)

Professional comments:

The main issues to consider in the assessment of this application are:

- Principle of land use;
- Character and appearance of the local streetscene;
- Trees, biodiversity and landscaping;
- Impact on River Crane;
- Transport and highways.

NPPF

NPPF Chapter 10 'Supporting High Quality Communications' 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.

Further guidance is provided in the Council's Telecommunications Equipment SPD.

Turning to the proposal, supplementary information submitted with the application states the proposed development is required to allow increased connectivity and reliability of mobile networks for H3G. It states that alternative sites have been considered and that as part of this consideration the current application site was chosen on the grounds that it is not a sensitive environmental and not likely to be significantly adversely impacted by the proposed works. A list of alternative sites has been provided and reasons for their being discounted. However, the list is not accompanied by a map and so it is not clear where their exact proposed siting is; Chertsey Road is listed four times but it is not clear where on Chertsey Road the works would be located. Furthermore, some of the reasons for their discounting are also applicable to the current application site, such as being in a densely residential area, adverse visual impact and narrowing of a footpath. The information also fails to state whether existing site has been considered for upgrade, or sharing with another operator, other than "the required improvements can only be provided by the installation of a new mast, and existing sites were not suitable to support the required apparatus". No information has been provided to support this claim. Furthermore, there is an objection to the combined excessive height and bulk of the proposed monopole in this open location, and it is not considered that the application has been sensitively designed

so as to mitigate its visual impact. The application is therefore considered to fail to comply with Para. 115 of the NPPF.

The application site is not within close proximity with electronic equipment or communications of a national importance. Officers not neighbour concerns about impact on Heathrow Airport and the Metropolitan Police but the application site is not considered to be within a close enough distance to have impact. The supporting information submitted with the proposal demonstrates that interference with other radio networks has been considered. The application is therefore considered to comply with Para. 116 of the NPPF.

The supplementary information submitted with the application identifies Clarendon Gateway Centre and Twickenham School as being approx. 210m and 290m from the proposal site respectively. The applicant confirms that both schools have been consulted. The application is therefore considered to comply with Part A of Para. 117 of the NPPF.

The supporting information references an attached ICNIRP certificate; however, no certificate has been submitted with the application. The proposal is therefore considered to fail to comply with Part C of Para. 117 of the NPPF.

In light of the above, it is not considered that the acceptability of the principle of the development has been demonstrated and there is therefore an objection to the application on this basis.

Character, appearance and design

Local Plan Policy LP1 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 LP5 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.

The Twickenham Village Planning Guidance summarises the character of the area thus:

'This area includes the extent of Crane Park that is within the Twickenham Village boundary, and the area of housing to the north, enclosed by Chertsey Road and the railway line to the east. The northern end of Meadway accesses onto the A316 Chertsey Road and a pedestrian underpass provides a link to Whitton, including its station.

The residential area around Lincoln Avenue, Selkirk Road and Meadway benefits from its proximity to Crane Park, but is relatively isolated from other parts of Twickenham. The inter-war housing area was laid out in the 1930s and is characterised by short blocks of terraces with gabled roofing steeply pitched with tile hung or timber cladding at each end. Other terraces are distinguished by their gabled bays and tudorbethan features, with red-brick flemish bond brickwork and red tile hung exterior. The houses step back from the road, with off-street car-parking and hard surfaces in front, although some houses have gardens with small brick walls fronting the pavement.'

The proposed monopole and associated cabinetry would be located on a hardstanding pathway alongside an open piece of green land. The area has an open feel and the green land is considered to contribute to the suburban nature of locality, which is shielded from Chertsey Road by hedging and trees. The low-rise dwellings also contribute to the low density and open feel of the area.

At 15m high with a prominent bulbous head, the proposed monopole would be the tallest structure in the nearby vicinity and despite its green colour, it would introduce an industrial and alien presence to this residential, open area, rendering it a prominent, highly noticeable and incongruous addition.

Furthermore, notwithstanding that the proposed monopole would tower above nearby trees, far from being screened by trees lining Chertsey Road, the application fails to provide insufficient information to demonstrate protection of these trees, and there is concern that they may be pruned or harmed as a result of the proposals. This would exacerbate the visual dominance of the proposed equipment, to the detriment of the character and appearance of the area, contrary to guidance in the Village Planning Guidance, which identifies harm to the balance of the green landscape as a threat from development.

With regards to the proposed associated cabinetry, whilst this is considered to be less prominent than the proposed monopole owing to the low heights, its siting is away from any natural boundary in this open space is considered to cause undue visual clutter.

Impact on River Crane

Local Plan Policy LP13 Part C 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 LP18 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 Rover 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.

Whilst the proposed works are considered to cause harm to the visual amenities of the surrounding area, the development is considered to be of a sufficient distance from the River Crane so as not to be visible or impact on its character or openness.

Biodiversity

Local Plan Policy LP15 Part A states that The Council will protect and enhance the borough's biodiversity, in particular, but not exclusively, the sites designated for their biodiversity and nature conservation value, including the connectivity between habitats. Weighted priority in terms of their importance will be afforded to protected species and priority species and habitats including National Nature Reserves, Sites of Special Scientific Interest (SSSI) and Other Sites of Nature Importance as set out in the Biodiversity Strategy for England, and the London and Richmond upon Thames Biodiversity Action Plans. This will be achieved by:

1. protecting biodiversity in, and adjacent to, the borough's designated sites for biodiversity and nature conservation importance (including buffer zones), as well as other existing habitats and features of biodiversity value;
2. supporting enhancements to biodiversity;
3. incorporating and creating new habitats or biodiversity features, including trees, into development sites and into the design of buildings themselves where appropriate; major developments are required to deliver net gain for biodiversity, through incorporation of ecological enhancements, wherever possible;
4. ensuring new biodiversity features or habitats connect to the wider ecological and green infrastructure networks and complement surrounding habitats;
5. enhancing wildlife corridors for the movement of species, including river corridors, where opportunities arise; and 6. maximising the provision of soft landscaping, including trees, shrubs and other vegetation that support the borough-wide Biodiversity Action Plan.

Part B states that where development would impact on species or a habitat, especially where identified in the relevant Biodiversity Action Plan at London or local level, or the Biodiversity Strategy for England, the potential harm should:

1. firstly be avoided (the applicant has to demonstrate that there is no alternative site with less harmful impacts),
2. secondly be adequately mitigated; or
3. as a last resort, appropriately compensated for.

It is noted that some neighbour objectors claim the presence of bats in the area. The Council reasonably believes it likely that the nearby presence of the River Crane means there are bat roosts nearby. As bats are a protected species, the Council would expect the submission of a Bat Survey. In the absence of such information, the application fails to comply with Policy LP15 above, and would further unduly impact on the character of the area. The Council's Ecology Officer has raised a concern with the application in this regard.

With regards to neighbour comments about the impact on wildlife more generally, studies are noted to have been largely inconclusive and there is no policy to support an objection on this basis.

Trees and landscaping

Local Plan Policy LP16 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 confirms that trees in proximity (within 50m) of the proposal site are not protected by conservation area or tree preservation order (TPO). There are no trees in the immediate vicinity of the proposal and so damage via excavation or connectivity with existing infrastructure is not foreseeable.

There are two Norway maple trees on the open space grass area which are currently young and likely to reach a height of over 20m. In the narrow verge separating Chertsey service road and the A316 London Planes are growing which are also young and currently at around 10m in height and will also reach a height of around 25m. These trees are considered to provide significant visual relief from the residential properties and the busy main road and also contribute to the leafy, suburban nature of this open space. They are therefore believed to be of significant townscape value and worthy of consideration. The Council's Trees Officer has advised that, as standard, with all these similar applications, officers remain concerned about future pressure to adversely prune and/or remove trees to improve signals when trees reach maturity.

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 on nearby trees 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 consistent advises that for applications for 5G equipment, 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.

Officers therefore raise an objection 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.

Officers note neighbour objectors' concerns about tree and shrub removal as a direct consequence of the application. The proposal would be located on a hardstanding pathway and no removal of trees or shrubs is proposed.

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 Principal Transport Planner has been consulted on the application and states that subject to the cabinet doors opening northwards, no objection is raised to the proposal's siting.

With regards to neighbour comments about an increase in traffic, congestion and air pollution, there is no evidence that the implementation of a telecommunications pole and equipment would increase traffic generation. The site is not currently accessible to traffic and vehicles as it is closed off by bollards. It is therefore not considered that parking, turning circles or emergency vehicle access would be impacted. The proposed pole is not considered to be unduly noticeable from Chertsey Road and so is not considered to be of a siting which would be a visual distraction to drivers which would compromise highways safety.

With regards to construction and maintenance, this would be a highways matter and it is not considered that the siting would be such that the implications of this would impact on highways safety.

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, together with the absence of a Bat Survey, the application is considered to result in a visually prominent, incongruous and overbearing form of development which would cause unacceptable harm to the visual amenities, character and appearance of the local area. As such, the application fails to comply with Para. 115 of the NPPF (2021), and policies within the Local Plan (2018), in particular, LP1, LP5, LP15, LP16 and LP33 and the following Supplementary Planning Documents and other guidance: Richmond Biodiversity Action Plan, Design Quality SPD (February 2006), Twickenham Village Planning Guidance SPD (January 2018), Telecommunications Equipment SPD (June 2006).

Furthermore, in the absence of sufficient information that alternative sites were reasonably considered and the failure to submit an ICNIRP Certificate, the application fails to comply with the requirements set out on Paras. 115 and 117 of the NPPF (2021).

Recommendation: Prior Approval is REQUIRED and REFUSED