

Application reference: 22/2085/TEL TEDDINGTON WARD

Date application received	Date made valid	Target report date	8 Week date
30.06.2022	30.06.2022	24.08.2022	24.08.2022

Site:

Telecommunications Apparatus Adj To 1 Admiralty Rd And Junction Of Bullard Rd, Queens Road, Teddington,

Proposal:

Installation of a new 15m monopole tower to support antenna, associated radio-equipment 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 Ltd
450 Longwater Avenue
Green Park
Reading
RG2 6GF

AGENT NAME

Telecoms Dalcour Maclaren
1 Staplehurst Farm
Weston on the Green
OX25 3QU
United Kingdom

DC Site Notice: printed on 05.07.2022 and posted on 15.07.2022 and due to expire on 05.08.2022

Consultations:

Internal/External:

Consultee

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

Expiry Date

19.07.2022
19.07.2022
20.07.2022

Neighbours:

5 Coleshill Road, Teddington, TW11 0LL -
44 Admiralty Way, Teddington, TW11 0NL -
17 Admiralty Way, Teddington, TW11 0NL -
Florence Villa, Park Lane, Teddington, TW11 0HY -
89 Queens Road, Teddington, TW11 0LZ -
16 Clive Road, Twickenham, TW1 4SG -
2 Admiralty Way, Teddington, TW11 0NL -
4 Admiralty Way, Teddington, TW11 0NL -
57 Admiralty Way, Teddington, TW11 0NL -
16 Coleshill Road, Teddington, TW11 0LJ -
65 Admiralty Way, Teddington, TW11 0NN -
65 Elmfield Avenue, Teddington, TW11 8BX -
68 Park Lane, Teddington, TW11 0HX -
108 Park Road, Teddington, TW11 0AN -
99 Queens Road, Teddington, TW11 0LZ -
76 Park Lane, Teddington, TW11 0HX -
69 Coleshill Road, Teddington, TW11 0LL -
74 Park Lane, Teddington, TW11 0HX -
111 Queens Road, Teddington, TW11 0LZ -
Malpas, Park Lane, Teddington, TW11 0HY -

” -

25 Ringwood Way, Hampton Hill, TW12 1AT -
Flat 2,3 King Edwards Grove, Teddington, TW11 9LY -

86 Admiralty Way, Teddington, TW11 0NN -
 109 Queens Road, Teddington, TW11 0LZ -
 72 Admiralty Way, Teddington, TW11 0NN -
 107 Queens Road, Teddington, TW11 0LZ -
 76 Admiralty Way, Teddington, TW11 0NN -
 149 Queens Road, Teddington, TW11 0LZ -
 117 Queens Road, Teddington, TW11 0LZ -
 Flat 4, Greytiles, 119 Queens Road, Teddington, TW11 0ND -
 Thorby, Park Lane, Teddington, TW11 0HY -
 Apartment 1, Elm Lodge, Queens Road, Teddington, TW11 0DA, - 05.07.2022
 Apartment 8, Elm Lodge, Queens Road, Teddington, TW11 0DA, - 05.07.2022
 Apartment 7, Elm Lodge, Queens Road, Teddington, TW11 0DA, - 05.07.2022
 Apartment 6, Elm Lodge, Queens Road, Teddington, TW11 0DA, - 05.07.2022
 Apartment 5, Elm Lodge, Queens Road, Teddington, TW11 0DA, - 05.07.2022
 Apartment 4, Elm Lodge, Queens Road, Teddington, TW11 0DA, -
 Apartment 3, Elm Lodge, Queens Road, Teddington, TW11 0DA, - 05.07.2022
 Apartment 2, Elm Lodge, Queens Road, Teddington, TW11 0DA, - 05.07.2022
 Basement Flat, 93 Queens Road, Teddington, TW11 0LZ, - 05.07.2022
 Flat 3, 93 Queens Road, Teddington, TW11 0LZ, - 05.07.2022
 Flat 2, 93 Queens Road, Teddington, TW11 0LZ, -
 Garden Flat, 93 Queens Road, Teddington, TW11 0LZ, - 05.07.2022
 93 Queens Road, Teddington, TW11 0LZ, - 05.07.2022
 Flat 2, North Lodge, 2 Admiralty Road, Teddington, TW11 0NP, -
 Flat 1, North Lodge, 2 Admiralty Road, Teddington, TW11 0NP, - 05.07.2022
 Flat 5, North Lodge, 2 Admiralty Road, Teddington, TW11 0NP, - 05.07.2022
 Flat 4, North Lodge, 2 Admiralty Road, Teddington, TW11 0NP, - 05.07.2022
 Flat 3, North Lodge, 2 Admiralty Road, Teddington, TW11 0NP, -
 Flat 6, North Lodge, 2 Admiralty Road, Teddington, TW11 0NP, -
 101 Queens Road, Teddington, TW11 0LZ, -
 95D Queens Road, Teddington, TW11 0LZ, - 05.07.2022
 95B Queens Road, Teddington, TW11 0LZ, -
 99 Queens Road, Teddington, TW11 0LZ, - 05.07.2022
 Parkside, 97 Queens Road, Teddington, TW11 0LZ, - 05.07.2022
 95C Queens Road, Teddington, TW11 0LZ, -
 95A Queens Road, Teddington, TW11 0LZ, - 05.07.2022
 91 Queens Road, Teddington, TW11 0LZ, - 05.07.2022
 1 Admiralty Road, Teddington, TW11 0NP, -
 113 Queens Road, Teddington, TW11 0LZ -
 11A Coleshill Road, Teddington, TW11 0LL -
 Westward, Park Lane, Teddington, TW11 0HY -
 41 Normansfield Court, 22 Langdon Park, Teddington, TW11 9FE -
 13 Admiralty Way, Teddington, TW11 0NL -
 91 Queens Road, Teddington, Tw11 0LZ -
 87 Queens Road, Teddington, TW11 0LZ -
 Ditton Lodge, Park Lane, Teddington, TW11 0HY -
 71 Admiralty Way, Teddington, TW11 0NN -
 37 Windsor Road, Teddington, TW11 0SG -

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

Development Management

Status: PDE

Application: 22/2085/TEL

Date:

Installation of a new 15m monopole tower to support antenna, associated radio-equipment 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: 12/08/2022

I agree the recommendation: WT

~~Team Leader/Head of Development Management/Principal Planner~~

Dated:15/08/2022.....

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

U0067244	Incorrect Drawings
U0067245	Decision Drawing Numbers

Application reference: 22/2085/TEL

Site address: Telecommunications Apparatus Adj to 1 Admiralty Rd and Junction of Bullard Rd Queens Rd Teddington

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 and granted 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 adjacent to 1 Admiralty Road and Junction of Bullard Road, Queens Road, Teddington.*

The application proposes a new 15m telemast pole with antenna within a shroud at the head with wraparound cabinet at ground. Also proposed at ground level is: 1 x Ericsson 6130 equipment cabinet, 1 x Commscope bowler cabinet, a x 1000 duct for incoming power, 1 x AC transmission cabinet and 1 x 750 duct for incoming TX. Proposed works would be in colour RAL 7035.

Site:

The application relates to a section of a public pavement adjacent to No. 1 Admiralty Road at the junction with Bullard Road, south of Queens Road, Teddington ward. The site is immediately outside of the gates to the Admiralty Way development of the National Physical Laboratory (NPL) complex, which also acts as a gateway to Bushy Park beyond

The site is not listed and is not in or adjacent to a conservation area, though there are some heritage assets to consider in the immediate local area, including Grade II Listed North Lodge approx. 25m to the south east, Buildings of Townscape Merit (BTMs) 1-8 Elm Lodge and Victoria House immediately east and 95 Queens Road on the opposite side of the junction.

The site forms part of Character Area 15 'Broad Street and Queens Road' of the Hampton Wick and Teddington Village Planning Guidance. Aside from the NPL, the immediate surrounding area is predominantly residential in nature comprising of a range of dwellings between two and three storeys in height. The area has a leafy, suburban character and there are a number of trees and hedges in the area. Bushy Park is located to the south and south west of the site, approx. 150m away at its nearest boundary. Bushy Park is a Grade I Listed Historical Park and Metropolitan Open Land (MOL) whose boundary walls are Grade II Listed.

Relevant planning history:

None.

Amendments:

The applicant submitted additional information in support of the scheme on 26/07/2022. This has been considered as part of the assessment; however, it was not considered necessary to re-consult neighbours as the works as proposed were unchanged and evident from the submitted plans. The additional information was further noted to not fundamentally change officers' recommendation with regards to unacceptable design and siting.

Other matters:

The submitted drawings are incorrect as both the proposed pole and cabinetry are shown in different locations when comparing the proposed elevations drawing with the proposed

site plan. This was not considered to preclude officers' ability to assess and determine the application; however, the applicant is advised that a future application would require the submission of an accurate set of drawings for the Council to be able to grant prior approval, were the application acceptable in principle in all other respects. An informative is recommended drawing the applicant's attention to this advice.

Material representations:

Neighbour consultation

Letters of notification were posted to 70 neighbouring properties and a site notice was erected in the area. To date, a total of 65 letters of objection have been received from neighbouring households and the Teddington Society Planning Group. Below is a summary of pertinent comments made 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 and heritage assets is considered in the 'Character and Appearance' section of the report below
Not in keeping with streetscene / impact on visual amenities	
Layout / density	
Siting in residential area	
No landscaping proposed	
Impact on Bushy Park	
Overbearing	
Height	
Design	
Heritage impact	
<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	
<i>Transport and highways</i>	
Narrow pavement	The impact of the proposal's siting on transport and highways is considered in the 'Transport and Highways' section of the officer assessment below.
Access	
Highways safety	
<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.
Inadequate ICNIRP	
<i>Other matters</i>	
Alternative sites	This is considered in the 'NPPF' section of the

Need for development	assessment below.
Sited next to children's nursery	
Impact on NPL	
Not received notification	Letters of notification were sent to 70 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.
Archaeological impact	The site is not within an Area of Archaeological Priority
Missing information	Please refer to 'Amendments' section above.
Inaccurate drawings	Please refer to 'Other Matters' above.
Why is Council even considering the application	The Council has a statutory duty to assess all valid applications received.
Environmental Impact Assessment should be undertaken	The application does not meet the threshold for the statutory requirement for an EIA.
Attracts graffiti	Were the application acceptable in all other respects, this matter could be addressed via condition.
<i>Non-material matters</i>	
Will seek legal action	Noted.

Internal consultees

- *Transport* – No objection
-
- *Trees* – Insufficient information regarding impact on adjacent trees
- *Urban Design* – Objection

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

Local Plan (2020):

- Policy LP1 Local Character and Design Quality
- Policy LP2 Building Heights
- 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 LP16 Trees, Woodland and Landscaping
- Policy LP33 Telecommunications
- Policy LP44 Sustainable Travel Choices

Supplementary Planning Documents (SPD) / Guidance:

- Buildings of Townscape Merit SPD (May 2015)
- Design Quality SPD (February 2006)

- Hampton Wick and Teddington Village Planning Guidance SPD (June 2017)
- Telecommunications Equipment SPD (June 2006)

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. 114 to 118 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.

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

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 lists a number of alternative sites that were considered and their reasons for being discounted. That some of the sites were discounted on grounds of being in private ownership is not considered to be a sufficient reason as this would not preclude an agreement being made with the land owner. Further, that one site was discounted on grounds that the option "did not provide a better town planning and environmental solution, when compared directly to the application site" is also not considered to be a sufficient justification, given that the chosen application site results in an unacceptable impact on the setting of a listed building. Further, the information does not state why existing masts were not considered for sharing, and the reason given for not using a tall building ('It is not within the scope of this project to deploy equipment on existing tall buildings or structures as the equipment is to cover an area of weaker network connectivity') does not sufficiently demonstrate why this option was not pursued. Furthermore, it is not considered that the application has been sympathetically designed or camouflaged so to mitigate its visual impact. The application is therefore considered to fail to comply with the requirements set out in Para. 115 of the NPPF.

Para. 117 NPPF – Interference with other equipment and services

The proposed works are located directly adjacent to the NPL, the UK's National Metrology Institute. The national measurement standards laboratory is one of the most extensive government laboratories in the UK and has a prestigious reputation for its role in setting and maintaining physical standards for British industry. Some of the buildings have

antennae and masts as part of the NPL's operations and research. No evidence is submitted with the application which demonstrates that the NPPL's operations would not be impacted by the proposal, or that the NPL has been consulted. The application is therefore considered to fail to comply with Para. 117 of the NPPF.

Para 117 (a) NPPF – Consultation

Supplementary information submitted with the application states that letters of notification were sent to the ward Councillors and LEYF Bushy Tails Nursery and Pre-School, which is approx. 80m west of the site, and thus within a close enough proximity to be impacted by the proposals. The supporting information states that no responses have been received. The application is considered to comply with Para 117 (a) of the NPPF in this respect.

Para 117 (c) NPPF – International Commissions guidelines compliance

A copy of an email from MBNL Deployment to a Trainee Design Technician for Three with the subject line 'ICNIRP English Form – confirmation of submission' has been submitted as part of the proposal. It is not clear what the contents of the email demonstrate and it is not considered that this represents a International Commission on Non-Ionizing Radiation Protection Declaration (ICNIRP). The application is therefore considered to fail to comply with Para. 117 (c) of the NPPF.

Character, appearance and design

The statutory duty in Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act 1990') requires that special attention is paid to the desirability of preserving or enhancing the character or appearance of a Listed Building including its setting.

The NPPF paras. 194 to 208 set out the statutory duties of the decision-maker 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. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

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 LP2 (Building Heights) states that the Council will require new buildings, including extensions and redevelopment of existing buildings, to respect and strengthen the setting of the borough's valued townscapes and landscapes, through appropriate building heights, by the following means:

1. require buildings to make a positive contribution towards the local character, townscape and skyline, generally reflecting the prevailing building heights within the vicinity; proposals that are taller than the surrounding townscape have to be of high architectural design quality and standards, deliver public realm benefits and have a wholly positive impact on the character and quality of the area;
2. preserve and enhance the borough's heritage assets, their significance and their setting;
3. respect the local context, and where possible enhance the character of an area, through appropriate: a) scale b) height c) mass d) urban pattern e) development grain f) materials g) streetscape h) Roofscape and i) wider townscape and landscape;
4. take account of climatic effects, including overshadowing, diversion of wind speeds, heat island and glare;
5. refrain from using height to express and create local landmarks; and
6. require full planning applications for any building that exceeds the prevailing building height within the wider context and setting.

Local Plan Policy LP3 (Designated Heritage Assets) 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 BTMs.

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.

The application relates to a section of a public pavement adjacent to No. 1 Admiralty Road at the junction with Bullard Road, south of Queens Road. The site is immediately outside
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of the gates to the Admiralty Way development of the National Physical Laboratory (NPL) complex and the proposed siting is noted to be particularly prominent along Queen. The site is also surrounded by a number of residential BTMs, to include 1-8 Elm Lodge and Victoria House immediately east and 95 Queens Road on the opposite side of the junction, and also the Grade II Listed North Lodge approx. 25m to the south east.

The site forms part of Character Area 15 'Broad Street and Queens Road' of the Hampton Wick and Teddington Village Planning Guidance. Aside from the NPL, the immediate surrounding area is predominantly residential in nature comprising of a range of dwellings between two and three storeys in height. The area has a leafy, suburban character and there are a number of trees and hedges in the area. The Village Planning Guidance summarises the character of the area thus:

'This character area to the north of Bushy Park includes the large gated complex of the National Physical Laboratory and the busy shopping area of Broad Street. Between the two is a network of wide streets characterised by busy traffic, but with a historic urban form including some large set-back houses and later terraces. Park Lane Stables is located along Park Lane to the east of the character area. ...

...Broad Street is linked to a network of wider roads with faster traffic – Hampton Road, Park Road, Queen's Road and Stanley Road. These still display, in places, an old pattern of development characterised by large properties set far back from the road, but many of the large houses have been replaced by later housing blocks. These are generally in brick, though in a modern style. In between these plots are more conventional rows of detached and semi-detached houses, often of the Edwardian period and with a mix of red brick and stucco. Typical features are pitched, clay-tiled roofs with applied timbering to the gables.

Queens Road incorporates a mix of housing including a row of 1930s houses to the south after Park Lane. On the south side of Queen's Road, the late twentieth century Admiralty Way development is planned around car access, not addressing the street, but the character of the housing is based on traditional models and features shaped gables, in brick and stucco and with sash windows.'

The proposed monopole and associated cabinetry would be located on a visually prominent stretch of Queens Road, made more noticeable by its siting next to the wide, open entrance to the NPL Admiralty Way development. The proposed installation would be almost double the height of the existing street lighting, and the pole itself of much thicker section with a bulbous top, therefore would not 'read' as street lighting. The additional clutter of utility cabinets is unwelcome and is considered to cause undue visual additional clutter at this prominent location. The area has a suburban, leafy residential feel with 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 in the vicinity, 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.

The Council's Urban Design Officer has been consulted on the application and considers that the harmful impact to the visual amenities of the surrounding area would also be detrimental to the settings of the nearby BTMs and the Grade II Listed North Lodge. With regards the harm caused to the setting of the Listed Building, this harm is considered to be 'less than significant'. The applicant has submitted a Government Guideline paper title '5G mobile technology: a guide', which is an explanatory note of 5G mobile technology. However, no specific positives of the application in question have been provided and whilst recognising the public benefit of improving 5G coverage, officers do not consider that this would outweigh the heritage harm identified above.

With regards the impact on Bushy Park, this is considered to be of a sufficient distance from the application site for there to be no harm to the character and appearance of the Historical Park and listed boundary walls and their setting, or to the character and openness of the MOL.

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).

There are a number of prominent trees of Queens Road, which contribute to the leafy, suburban character of the area. Behind the site there is noted to be a crown-reduced small domestic tree in the adjacent rear garden. 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). However, as identified above, trees in the vicinity are considered to be of significant townscape value, which provide significant visual relief from the residential properties and the busy vehicular 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 consistently 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.

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 confirms that there would be sufficient passing space for pedestrians when operatives may be working in front of the cabinets with the doors open, and thus there are no concerns with pedestrian or vehicular visibility. The application is therefore considered to be of an acceptable design and siting with regards to highways safety.

Conclusion and Planning Balance

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 visual amenities, character and appearance of the local area and the settings of the Grade II Listed North Lodge and nearby Buildings of Townscape Merit 1-8 Elm Lodge, Victoria House and 95 Queens Road. As such, the application fails to comply with Paras. 115, 202 and 203 of the NPPF (2021), and policies within the Local Plan (2018), in particular, LP1, LP2, LP3, LP4, LP5, LP15, LP16 and LP33 and the following Supplementary Planning Documents: Buildings of Townscape Merit SPD (May 2015), Design Quality SPD (February 2006), Hampton Wick and Teddington Village Planning Guidance SPD (June 2017), Telecommunications Equipment SPD (June 2006).

As per the requirement of Para. 202 of the NPPF, the Case Officer acknowledges the importance of providing an efficient digital communications service in the local area, and has given this public benefit significant weight in the assessment of the application. However, this is not considered to be a material planning consideration of such weight so as to justify the proposal's departure from the Development Plan policies and planning guidance cited above.

Furthermore, in the absence of sufficient information demonstrating that alternative sites have been reasonably considered, failure to demonstrate that there would be no interference with other electrical equipment at the adjacent National Physical Laboratory, and the failure to submit a valid ICNIRP Certificate, the application fails to comply with the requirements set out on Paras. 115, 116, 117 and 118 of the NPPF (2021).

Recommendation: Prior Approval is REQUIRED and REFUSED