

## Application reference: 21/4108/FUL TEDDINGTON WARD

Date application received	Date made valid	Target report date	8 Week date
30.11.2021	04.05.2022	29.06.2022	29.06.2022

**Site:**

Telecommunications Site, Telephone Exchange, High Street, Teddington

**Proposal:**

Installation of 3 No. proposed antennas, installation of 3 No. proposed equipment cabinets, installation of 1 No. meter cabinet; installation of minor ancillary apparatus and associated works.

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

**APPLICANT NAME**

Cellnex  
Ground floor  
Arlington Business Park  
Theale  
RG7 4SA  
United Kingdom

**AGENT NAME**

Mrs Aruna Venkatraman  
DALY INTERNATIONAL (UK) Ltd  
Ground Floor  
1430 Arlington Business Park  
Theale  
RG7 4SA

**DC Site Notice:** printed on 04.05.2022 and posted on 13.05.2022 and due to expire on 03.06.2022

**Consultations:****Internal/External:****Consultee**

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

**Expiry Date**

31.08.2022  
11.07.2022  
27.06.2022  
18.05.2022

**Neighbours:**

37 Windsor Road, Teddington, TW11 0SG, - 04.05.2022  
2A Watts Lane, Teddington, TW11 8HQ, - 04.05.2022  
104A High Street, Teddington, TW11 8JD, - 04.05.2022  
104 High Street, Teddington, TW11 8JD, - 04.05.2022  
39 39 Springfield Road, Teddington, Tw11 9ap - 04.05.2022  
,, - 04.05.2022  
21 Springfield Road, Teddington, TW11 9AP, - 04.05.2022  
Flat 2, 86 High Street, Teddington, TW11 8JD - 04.05.2022  
117 High Street, Teddington, TW11 8HG - 04.05.2022  
115 High Street, Teddington, TW11 8HG - 04.05.2022  
113 High Street, Teddington, TW11 8HG, -  
111 High Street, Teddington, TW11 8HG - 04.05.2022  
93 High Street, Teddington, TW11 8HG, - 04.05.2022  
Flat Above, 91 High Street, Teddington, TW11 8HG, - 04.05.2022  
97 High Street, Teddington, TW11 8HG, - 04.05.2022  
97B High Street, Teddington, TW11 8HG, - 04.05.2022  
99 - 109 High Street, Teddington, TW11 8HG, - 04.05.2022  
Ground Floor, 95 High Street, Teddington, TW11 8HG, - 04.05.2022  
91 High Street, Teddington, TW11 8HG, - 04.05.2022  
4 Udney Park Road, Teddington, TW11 9BG, - 04.05.2022  
Ground Floor, 7 Plough Lane, Teddington, TW11 9BN, - 04.05.2022

First Floor Flat,100 High Street,Teddington,TW11 8JD, - 04.05.2022  
 Flat 3,86 High Street,Teddington,TW11 8JD, -  
 Flat,102 High Street,Teddington,TW11 8JD, - 04.05.2022  
 Flat 1,86 High Street,Teddington,TW11 8JD, - 04.05.2022  
 84 High Street,Teddington,TW11 8JD, - 04.05.2022  
 First Floor,7 Plough Lane,Teddington,TW11 9BN, - 04.05.2022  
 100 High Street,Teddington,TW11 8JD, - 04.05.2022  
 25 Springfield Road,Teddington,TW11 9AP, - 04.05.2022  
 23 Springfield Road,Teddington,TW11 9AP, - 04.05.2022  
 21 Springfield Road,Teddington,TW11 9AP, - 04.05.2022  
 19 Springfield Road,Teddington,TW11 9AP, - 04.05.2022  
 84B High Street,Teddington,TW11 8JD, - 04.05.2022  
 39 Springfield Road,Teddington,TW11 9AP, - 04.05.2022  
 37 Springfield Road,Teddington,TW11 9AP, - 04.05.2022  
 35 Springfield Road,Teddington,TW11 9AP, - 04.05.2022  
 86 High Street,Teddington,TW11 8JD, - 04.05.2022  
 84A High Street,Teddington,TW11 8JD, - 04.05.2022  
 Flat 2,100 High Street,Teddington,TW11 8JD, - 04.05.2022  
 33 Springfield Road,Teddington,TW11 9AP, - 04.05.2022  
 31 Springfield Road,Teddington,TW11 9AP, -  
 29 Springfield Road,Teddington,TW11 9AP, - 04.05.2022  
 27 Springfield Road,Teddington,TW11 9AP, - 04.05.2022  
 17 Springfield Road,Teddington,TW11 9AP, - 04.05.2022  
 102 High Street,Teddington,TW11 8JD, - 04.05.2022

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

##### Development Management

Status: GTD

Date:04/01/1983

Application:82/0811

Alterations including the erection of a single storey extension at the rear of the premises to provide a new battery and power room; erection of a 3-storey infill extension at the side/front; realignment and extension of existing fire escape staircase at the rear and repositioning and enclosure of 2 exhaust pipes in a brick housing on the side elevation. Rearrangement of existing parking area to provide a total of 12 car parking spaces and erection of new boundary wall. (Amended plans received 15/10/82 and 29/11/82 re delete 1st floor extension and parking).

##### Development Management

Status: GTD

Date:07/10/1986

Application:84/0459/DD01

Alterations involving widening of existing vehicular access, alteration to forecourt area, erection of new balustrade, relocation of two car parking spaces and erection of new vehicular and pedestrian gates. (Details pursuant to condition (b) - materials).

##### Development Management

Status: GTD

Date:20/08/1985

Application:84/0459

Alterations involving widening of existing vehicular access, alteration to forecourt area, erection of new balustrade, relocation of two car parking spaces and erection of new vehicular and pedestrian gates. (Amended Drawings No. FSP4/3 received on 25th April 1985).

##### Development Management

Status: GTD

Date:07/10/1986

Application:84/0592/DD01

Demolition of part of building. (Details pursuant to Condition (b) - materials).

##### Development Management

Status: GTD

Date:07/10/1986

Application:84/0592/DD02

Demolition of part of building. (Details pursuant to condition (a) Appendix A - details of shop front).

##### Development Management

Status: GTD

Date:13/05/2005

Application:05/0522/FUL

Retention and change of use of telephone kiosk to combined ATM/Payphone use

##### Development Management

Status: RNO

Date:03/09/2015

Application:15/T0487/TCA

T1- Robinia Pseudoacacia - Pollard

##### Development Management

Status: WNA

Date:13/10/2020

Application:18/0128/TEL

Rooftop radio base station.

Development Management

Status: VOID  
Date:17/01/2018

Application:18/0011/VOID  
Proposed electronic communications installation by Cornerstone Telecommunications Infrastructure Ltd (CTIL) at Teddington Telephone Exchange, High Street, Teddington TW11 8JD.

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Development Management

Status: GTD  
Date:09/09/2019

Application:19/2013/FUL  
Replacement of glass from 8 windows with aluminium louvres on east and west elevations

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Development Management

Status: WDN  
Date:07/04/2021

Application:21/0509/TEL  
Installation of an electronic communications base station at roof level.

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Development Management

Status: PCO  
Date:

Application:21/4108/FUL  
Installation of 3 No. proposed antennas, installation of 3 No. proposed equipment cabinets, installation of 1 No. meter cabinet; installation of minor ancillary apparatus and associated works.

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Development Management

Status: GTD  
Date:08/08/2022

Application:22/0966/FUL  
The installation of three replacement antennas on a combination of existing and proposed support poles, a GPS module, handrailing, and ancillary electronic communications apparatus.

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**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): EMC

Dated: 11.01.23

**I agree the recommendation: CTA**

Team Leader/Head of Development Management/Principal Planner

Dated: .....13/01/2023.....

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: .....

<b>REASONS:</b>
<b>CONDITIONS:</b>
<b>INFORMATIVES:</b>
<b>UDP POLICIES:</b>
<b>OTHER POLICIES:</b>

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

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### CONDITIONS

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### INFORMATIVES

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22/1858/FUL

<b>Application reference:</b>	<b>21/4108/FUL</b>
<b>Site address:</b>	<b>88 – 102 Telephone Exchange, High Street, Teddington, TW11 8JD</b>
<b>EOT</b>	<b>18.01.23</b>

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#### **1. Proposal:**

The application seeks full planning permission for:

*‘Installation of 3 No. proposed antennas, installation of 3 No. proposed equipment cabinets, installation of 1 No. meter cabinet; installation of minor ancillary apparatus and associated works.’*

The principle elements of the proposal are as follows:

- Installation of 3 No. proposed antennas,
- Installation of 3 No. proposed equipment cabinets,
- Installation of 1 No. meter cabinet;
- Installation of minor ancillary apparatus and associated works.

#### **2. Site and surroundings:**

The Telephone Exchange is located in Teddington Main Centre Boundary. The site is in an Archaeological Priority Area. It is subject to an Article 4 Direction A1 and A2 restricting A1 to A2 – High Street). The site is subject to an Article 4 Direction Basements. It is on the Brownfield Land Register.

The immediate area largely comprises of ground floor commercial properties with residential units above. The site is in the High Street (Teddington) Conservation Area 37. The site is adjacent to a string of Buildings of Townscape Merit (BTMs) which run adjacent to the east, west and opposite the site to the north including Nos. 100 – 168 (east), 86 -72 (west) and 73 – 123 (north). Grade I Listed properties Nos 79, 79A – 81, 81A, Nos 83 – 85 and Nos. 93 – 95 High Street are also opposite the site to the north.

The site is in an Area Susceptible to Groundwater Flood Risk. The site is also in an area at risk of Elevate Groundwater. It is also an area identified at Risk of Surface Water Flooding. Furthermore, it is in a Critical Drainage Area.

The site is subject to the site allocation Telephone Exchange, 88 High Street and is located in the High Street Village Character Area in the Hampton Wick and Teddington Village SPD.

#### **3. Key planning history:**

There are a number of planning applications relating to the site dating back to the 1980s. Below is a list of those deemed most recent and/or relevant to this application:

21/0509/TEL Installation of an electronic communications base station at roof level. WDN 07.04.2021

Application reference 21/0509/TEL sought prior approval for the installation of an electronic communications base station at roof level. The applicant was advised that the scheme, by virtue of its scale, bulk, design and siting would be harmful to character and appearance of the site and surrounding CA37 Conservation Area and the setting of the nearby Buildings of Townscape Merit. The resultant harm would not be outweighed by the public benefits of the scheme. As such, the proposal is contrary to Policies LP1, LP3, LP4 and LP33 of the Local Plan (2018); Supplementary Planning Document 'Telecommunications Equipment' (2006); Hampton Wick and Teddington Village Planning Guidance (2017); the High Street (Teddington) Conservation Area 37 Statement; London Plan (2021) and the National Planning Policy Framework (2019).

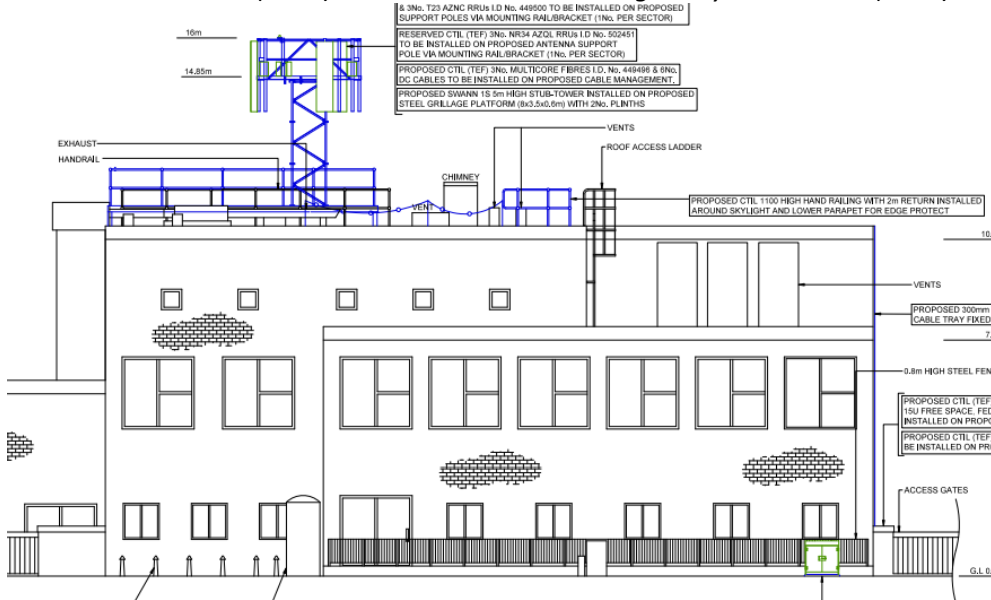


Figure 1. Proposed Elevations

19/2013/FUL Replacement of glass from 8 windows with aluminium louvres on east and west elevations Granted 09.09.2019

18/0128/TEL Telephone Exchange High Street Teddington Rooftop radio base station. DECISION WNA 13/10/2020

Proposal considered unacceptable due to visibility from the Conservation Area. Applicant looked into siting the equipment where it could not be seen but not feasible for technical reasons and decided not to proceed.

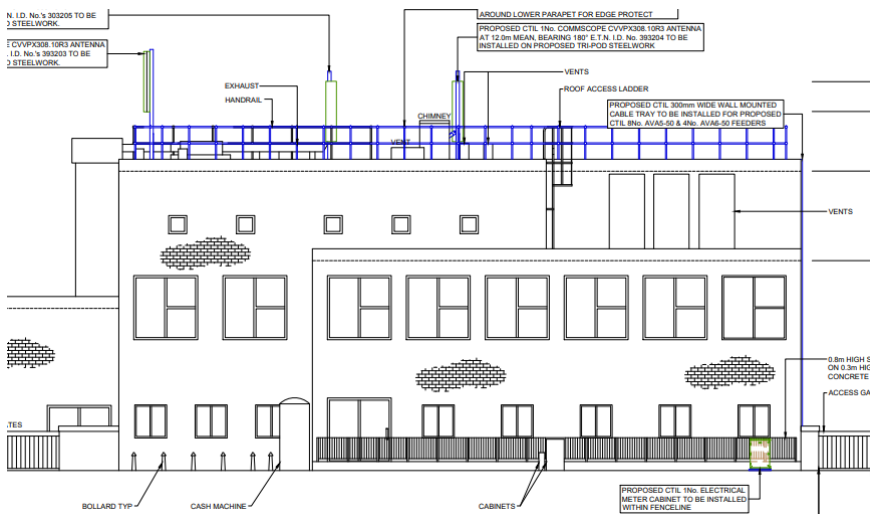


Figure 2. Proposed Elevations

05/0522/FUL Telephone Exchange (Outside On Pavement) High Street Teddington Richmond Upon Thames TW11 8JD Retention and change of use of Telephone kiosk to combined ATM/Payphone use GTD 13/05/2005

84/0459 Telephone Exchange 88-102 High Street Teddington Alterations involving widening of existing vehicular access, alteration to forecourt area, erection of new balustrade, relocation of two car parking spaces and erection of new vehicular and pedestrian gates. (Amended Drawings No. FSP4/3 received on 25<sup>th</sup> GTD 20/08/1985

84/0459/DD01 Telephone Exchange 88-102 High Street Teddington Alterations involving widening of existing vehicular access, alteration to forecourt area, erection of new balustrade, relocation of two car parking spaces and erection of new vehicular and pedestrian gates. (Details pursuant to condition (b) – material GTD 07/10/1986

82/0811 Telephone Exchange High Street Teddington Alterations including the erection of a single storey extension at the rear of the premises to provide a new battery and power room; erection of a 3-storey infill extension at the side/front; realignment and extension of existing fire escape staircase GTD 04/01/1983

#### **4. Amendments:**

The following revised plans were received in 23 May 2022:

16857-22-101-MD013 13 Proposed equipment plan  
16857-22-001-MD013 13 Existing site plan  
16857-22-100-MD013 13 Proposed site plan  
16857-22-150-MD013 13 Proposed elevations  
16857-22-002-MD013 13 Existing elevations

#### **5. Other matters:**

None.

#### **6. Material representations:**

The adjacent properties are Nos 84, 86, 86 flat 1-3 (west), Nos 100 – 102 High Street (east) and Nos 19 – 37 Springfield Road to the rear have been consulted. A full list of the neighbours consulted is listed below.

- 37 Windsor Road, Teddington TW11 0SG
- 2A Watts Lane, Teddington TW11 8HQ
- 104A High Street, Teddington TW11 8JD
- 104 High Street, Teddington TW11 8JD
- 39 39 Springfield Road, Teddington Tw11 9ap
- 21 Springfield Road, Teddington TW11 9AP
- Flat 2, 86 High Street Teddington TW11 8JD
- 117 High Street, Teddington TW11 8HG
- 115 High Street, Teddington TW11 8HG
- 113 High Street, Teddington TW11 8HG
- 111 High Street, Teddington TW11 8HG
- 93 High Street, Teddington TW11 8HG
- Flat Above, 91 High Street Teddington TW11 8HG
- 97 High Street, Teddington TW11 8HG
- 97B High Street, Teddington TW11 8HG
- 99 – 109 High Street, Teddington TW11 8HG

- Ground Floor, 95 High Street Teddington TW11 8HG
- 91 High Street, Teddington TW11 8HG
- 4 Udney Park Road, Teddington TW11 9BG
- Ground Floor, 7 Plough Lane Teddington TW11 9BN
- First Floor Flat, 100 High Street Teddington TW11 8JD
- Flat 3, 86 High Street Teddington TW11 8JD
- Flat, 102 High Street Teddington TW11 8JD
- Flat 1, 86 High Street Teddington TW11 8JD
- 84 High Street, Teddington TW11 8JD
- First Floor, 7 Plough Lane Teddington TW11 9BN
- 100 High Street, Teddington TW11 8JD
- 25 Springfield Road, Teddington TW11 9AP
- 23 Springfield Road, Teddington TW11 9AP
- 21 Springfield Road, Teddington TW11 9AP
- 19 Springfield Road, Teddington TW11 9AP
- 84B High Street, Teddington TW11 8JD
- 39 Springfield Road, Teddington TW11 9AP
- 37 Springfield Road, Teddington TW11 9AP
- 35 Springfield Road, Teddington TW11 9AP
- 86 High Street, Teddington TW11 8JD
- 84A High Street, Teddington TW11 8JD
- Flat 2, 100 High Street Teddington TW11 8JD
- 33 Springfield Road, Teddington TW11 9AP
- 31 Springfield Road, Teddington TW11 9AP
- 29 Springfield Road, Teddington TW11 9AP
- 27 Springfield Road, Teddington TW11 9AP
- 17 Springfield Road, Teddington TW11 9AP
- 102 High Street, Teddington TW11 8JD

Four public objections have been received and one from the Teddington Management Limited representing the residents of flats 11, 113, 115 and 117 High Street Teddington.

#### 4 Public Comments:

Public Comments	Officer Response
Unacceptable loss of light, overshadowing	It is not agreed that the proposal would cause overshadowing or loss of light to an unacceptable degree. See the 'Neighbour Amenity' section below.
Loss of privacy	It is not considered that the antennas would detrimentally impact on privacy. See the 'Neighbour Amenity' section below.
Detrimental to the character and appearance of the area.	It is agreed that the site would have a detrimental impact on the character and appearance of the site and immediate area. See the 'Heritage, Character & Design Section' below
Excessive in height	It is agreed that the 'height' is excessive here. Please see the 'Heritage, Character and Design' section below.
Detrimental to the historic character of the area	It is agreed that the site would have a detrimental impact on the character and appearance of the High Street Teddington Conservation Area. See the 'Heritage, Character and Design' Section below.
Same as the refused applicaion.	The design has been amended from the withdrawn scheme. 21/0509/TEL. This was withdrawn as it would be refused by the Council. The design is similar to but not the same as 18/0128/TEL which was also withdrawn. It was noted that the



	design of this was not considered acceptable in the WDN report.
Insufficient information on the health implications to exposure & health and safety	An ICNIRP Certificate has been supplied. This is a declaration of conformity public RF exposure guidelines. The proposal is acceptable in this regard

*Teddington Management Limited:*

<b>Objector</b>	<b>Objection</b>	<b>Officer Response</b>
Teddington Management Limited representing the residents of flats 11, 113, 115 and 117 High Street.	The antennas and apparatus would have a detrimental impact on the Telephone Exchange Building, surrounding streetscape and conservation area.	It is agreed that the site would have a detrimental impact on the character and appearance of the High Street Teddington Conservation Area. See the 'Heritage, Character and Design Section' below.
	Could set a precedent for the surrounding area.	Not a planning consideration. All applications are assessed on a case by case basis.
	Excessive in height and visually intrusive and overbearing.	It is agreed the antennas and apparatus would have an unacceptable negative impact on the character of the area however not on the visual amenity of neighbours. See the 'Neighbour Amenity' section below.
	Detrimental to the views from the flats opposite the site.	Whilst some deterioration on views is anticipated, it is not considered that the proposal would have an impact on the visual amenity of the occupants of the properties surrounding the site. See the 'Neighbour Amenity' section below.

Internal consultation

- Transport – No objection
- Trees – No objection
- Urban Design – Objection to impact on conservation area and settings of Listed Buildings and BTMs

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

**Planning policies:**

The application has been considered against relevant planning legislation and national, regional and local planning policies, in particular:

National Planning Policy Framework (NPPF) (2021):

- Chapter 10 Supporting High Quality Communications

London Plan (2021):

- Policy D12 Fire Safety

Local Plan (2018):

- Policy LP1 Local Character and Design Quality
- Policy LP3 Designated Heritage Assets
- Policy LP4 Non-Designated Heritage Assets
- Policy LP8 Amenity and Living Conditions
- 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)
- Telecommunications Equipment SPD (June 2006)
- Hampton Wick and Teddington Village SPD (2017)
- High Street (Teddington) Conservation Area 37 Statement

**7. Professional comments:**

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

- Principle of development;
- Character and appearance of the local streetscene;
- Heritage impacts;
- Neighbouring amenities;
- Trees and landscaping;
- Transport and highways.

Principle of Development

NPPF Chapter 10 'Supporting High Quality Communications' para. 112 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.

Para. 114 states 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 connect transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate.

Para. 115 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 wider area or a wide range of electronic communications development, or insist on minimum distances between new electronic communications development and existing development. They should ensure that:

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

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

Para. 116 goes on to state that applications for electronic communications development (including applications for prior approval under the General Permitted Development Order) should be supported by 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 for non-ionizing radiation protection (ICNIRP); 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 and a statement that self-certifies that, when operational, International Commission guidelines will be met.

Finally, para. 117 states that Local 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.

Local Plan Policy SA 5 Telephone Exchange, Teddington sets out that "if the site is declared surplus to requirements, appropriate land uses include commercial / retail on the ground floor, especially in the designated key shopping frontage facing the High Street. Any proposal should provide for employment floorspace, such as B1 offices. A mixed use scheme with housing (including affordable housing) in upper floors and to the rear of the site could be considered".

The applicaion aims to provide for the 'installation of 3 No. proposed antennas, installation of 3 No. proposed equipment cabinets, installation of 1 No. meter cabinet; and the installation of minor ancillary apparatus and associated works' on the roof and adjacent to the Telephone Exchange.

As noted above the site is in the town centre of Teddington. The application aims to improve mobile coverage to the town centre of Teddington and the area surrounding the High Street, to the south and north.

There is no blanket ban or restrictions on telecommunications in the borough subject to the relevant NPPF (2021), London plan (2021) and Local Plan (2018) policies being met.

It is recognised that the proposal seeks to reduce the need for a standalone telephone mast by locating equipment on the roof of an existing structure. The principle of this is welcomed in line with NPPF Para 155.

A Statement that the ICNIRP guidelines for public exposure would be met has been provided. In line with NPPF Paragraph 117.

The Planning Statement, Nov 21 sets out that Ward Councillors of the Teddington area and Buttercups Nursery on 6th September 2021. Letters providing more information about the proposal were posted to the following residents on "14th September: 84A, 84B, 111, 113, 115, 119A, High Street, • 19, 21, 23, 25, 27, 29, 31, 33, 35 Springfield Road." The Planning Statement, Nov 21 states that the respondent received was from was by Cllr Baker suggesting an alternative location. Consultation and a comprehensive summary of responses should be in any future planning application under **NPPF Paragraph 117**.

The site is in the High Street (Teddington) Conservation Area and it is adjacent to Grade I Listed Buildings as well as a string of BTMS. There is historic significance in Teddington High Street that needs to be protected and enhanced. This application is not supported as it is considered to be contrary to **NPPF (2021) and Local Plan (2018) xxxx. The applicant is advised that, unless a substantially smaller development and more sensitive form of development could be proposed on the roof of the Telephone Exchange, an application of this nature is unlikely to be supported in this location owing to the heritage constraints of the site.**

#### Heritage, Character and Design

The statutory duty in Sections 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act 1990') require that, when considering to grant planning permission for development which affects a listed building or its setting, special regard shall be had to the desirability of preserving the building or its setting, or any features of special architectural or historic interest which it possessed. Section 72 of the Act requires that the decision maker shall pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area in exercising its planning functions.

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 colocation of uses through the layout, design and management of the site.

All proposals will be assessed against the policies contained within 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.

The supporting text to SA5 Telephone Exchange, Teddington sets out that “the site is within the High Street Teddington Conservation Area, and any redevelopment proposal will need to respect its character and the settings of the listed buildings on the opposite side of the High Street.

Telecommunications SPD (2006) outlines that

“where masts are proposed on tall buildings or structures they should;

- be appointed to relate to that of its surroundings;
- be scaled in proportion to the building or structure;
- have minimal impact on the roof line;
- not adversely affect the impact on views or the skyline;
- avoid creating additional ‘clutter’
- use clean lines and maintain symmetry.”

#### *Heritage Significance*

The Conservation Area (37) is situated in the centre of Teddington. The character of the is described in the High Street Teddington Conservation Area Statement “*High Street (Teddington) conservation area forms part of the varied busy commercial centre and good quality residential areas extending from the High Street of Teddington. It has a traditional high street character of mainly specialist*

*shopping, importantly retaining an exceptional number of fine original shopfronts and some remarkable single storey shop units built on the frontage of older houses. This is a unifying feature of the area. There is a series of revealing views along the wide enclosed and gently curving street to the West and East, between the higher ground of the railway bridge and roundabout and down towards the riverside and the landmark St Alban's Church. The street is enclosed by an eclectic mix of predominately two storey traditional brick 18th century and later Victorian buildings on distinctively narrow plots to the North side, addressing the more imposing three storey Edwardian shopping parades, in well detailed red and yellow brick, to the South side. "*

The High Street Teddington Character Area is described in the Hampton Wick and Teddington Village SPD (2017) as follows "it has a traditional high street character of mainly specialist shopping, retaining an exceptional number of original shop fronts and single storey shop units built on the frontage of older houses. This is a unifying feature of the area. The High Street is enclosed by a mix of predominately two storey traditional brick eighteenth century and later Victorian buildings on distinctively narrow plots to the north side, in well detailed red and yellow brick. The variety of building forms, facades and roofscape provides interest and diversity to the street scene." Threats to the area are identified as "new development that does not complement the existing built form, particularly in terms of height and massing."



Figure 1. Telephone Exchange, High Street Teddington





Figure 2. Telephone Exchange, High Street Teddington



Figure 3. Adjacent to the West



Figure 4. BTMs (yellow) Listed Buildings (blue/pink/green)

The building itself is not a BTM and is a site allocation SA5. The site is however of heritage significance owing to its location in a prominent location in High Street Teddington Conservation Area 37. It incorporates the length of the High Street between the railway line to the west and Kingston Lane to the east. The Conservation Area was designated in 1982 and was extended in 2013. Grade I Listed properties Nos 79, 79A – 81, 81A, Nos 83 – 85 and Nos. 93 – 95 High Street opposite the site to the north. BTMs include Nos. 100 – 168 (east), 86 -72 (west) and 73 – 123 (north). A key part of the heritage significance of the area is the original character and Edwardian shopping parades, in well detailed red and yellow brick. These buildings are locally listed as they are reflective of how a shopping street would have appeared in the past and are of high architectural merit. A Planning Statement has been supplied by Cellnex and Telefonica dated November 2021.

### *Harm*

The proposed rooftop telecom equipment (3 No. proposed antennas and supporting equipment on the roof) detracts from a very sensitive High Street Teddington Conservation Area in close proximity to Grade I Listed properties Nos 79, 79A – 81, 81A, Nos 83 – 85 and adjacent BTMs Nos 86 and 100 High Street. It is considered that the height and design of the antennas and supporting structures would cause less than substantial harm to this part of the High Street Teddington Conservation Area. They would be visually conspicuous sited on top of the Telephone exchange building. The proposed 3 thick antennas do not read as domestic aerials. The proposals on the roof would noticeably detract from the significance of the setting of the Grade I Listed Buildings directly opposite Nos 93 – 95 High Street Teddington and the adjacent BTMs Nos 86 and 100 High Street

### *Public Benefit*

It is noted that the proposal comprising of antennas and supporting structures seek to provide 5 G mobile phone connectivity. The applicant's Planning Statement November 2021 outlines that the public benefit to outweigh any harm would be the provision of 5G mobile phone connectivity. This would improve the UK mobile services. Supporting documents also include Site Specific Supporting Operational and Technical Justification 30 Nov 2021.

The site does already benefit from mobile phone signal coverage. The supplied Report Telefonica Coverage Existing 4G Network Report 12 October 2021 identified the site as 'indoor dense urban' this quantifies as "sufficient signal strength to provide for indoor use of a hand portable mobile in urban areas. Mast Data which provides an overview of mobile signal coverage suggests that the 4G O2 coverage in the area is shown as average. <https://mastdata.com>.

It is not considered that upgrading to 5G phone signal would outweigh the less than substantial harm to the Conservation Area, immediate setting to the Grade I Listed Buildings Nos 93 – 95 High Street or the adjacent BTMs Nos 86 and 100 High Street. It is considered that the original character of the High Street Teddington needs to be retained.

### Neighbour Amenity

Local Plan Policy LP8 seeks to protect neighbouring amenities from the effects of development. The application is not considered to cause loss of light, outlook or cause unacceptable noise to any neighbouring residential properties.

As noted above, the application includes the submission of an International Commission on Non-Ionizing Radiation Protection Declaration (ICNIRP) which is considered to be acceptable and in line with the requirements of Para. 116 of the NPPF.

The height and design of the 3 No. proposed antennas and additional supporting equipment on the roof are not in close enough proximity to warrant a refusal on the grounds of harm to residential amenity. Despite being in direct line of sight of the flats opposite the site (Nos 91 – 111 High Street) and adjacent to the site (Nos 86, 100 adjacent the site) the antenna are located at a distance which



cannot be considered to be overbearing to these properties which would warrant a reason for refusal. The profile of the 3 antennas and supporting roof infrastructure are not wide enough that sunlight or daylight would be adversely impacted.

### Transport

Local Plan Policy LP44 seeks to promote sustainable forms of travel. Local Plan Policy LP45 relates to parking standards and servicing. The replacement masts would be at roof level. The Council's Transport Officer has been consulted on the application and confirms that it would have no undue impact on highways safety.

### Flood Risk

Para 167 of the NPPF requires that when determining planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate applications should be supported by a site specific flood risk assessment. This should demonstrate that, amongst other things, the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment. The NPPF clarifies that this should apply to all proposals in flood zone 1 on sites identified in a strategic flood risk assessment as being subject to other sources of flooding.

The Council's LP21 requires an FRA for 'all other development proposals' in such areas. The application has not been submitted with a Flood Risk Assessment as is required by Councils Local Validation Checklist within sites designated with the above mentioned risks of flooding. In the absence of such detail, the Council is unable to make a full and proper assessment of the potential flood risk in respect of the siting of the monopole and therefore the scheme is considered to be contrary to Local Plan Policy LP21.

The Council notes the dismissed appeal APP/J0350/W/W19/324002 in which an Inspector found that the NPPF makes it clear that, even minor developments should still meet the requirements for site-specific flood risk assessments and "therefore, in the absence of an accompanying FRA, it not possible to conclude that the proposal would not result in increased flood risk within the area".

The site is in an Area Susceptible to Groundwater Flood Risk. The site is also in an area at risk of Elevate Groundwater. It is also an area identified at Risk of Surface Water Flooding. Furthermore, it is in a Critical Drainage Area.

Given the primary siting of the proposal on the roof of the Telephone Exchange, it is not considered that the development would be contrary to NPPF Para 167 (2021) and Local Plan (2018) LP21.

### Trees

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

*Require that trees are adequately protected throughout the course of development, in accordance with British Standard 5837"*

The Council's Trees Officer has been consulted. There are no trees within the immediate surrounds of any significant amenity value. Teddington high street has no street trees nor private trees close

## **8. Recommendation**

This recommendation is made following careful consideration of all the issues raised through the application process. In making this recommendation consideration has been had to the statutory duties imposed by the Planning (Listed Buildings and Conservation Areas) Act 1990 and the requirements set out in Chapter 16 of the NPPF. For the reasons set out above, it is considered that the adverse impacts of allowing this planning application would significantly outweigh the benefits, when assessed against the policies in NPPF (2021) and Development Plan, when taken as a whole.

### **Refuse planning permission for the following reasons**

#### Heritage, Character and Design

The proposed 3 antennas and supporting structures on the roof of the Telephone Exchange, Teddington by reason of their combined inappropriate design, scale, bulk and mass would result in an unsympathetic form of overdevelopment that would fail to harmonise with the appearance and setting of the adjacent Grade I Listed Buildings directly opposite the site at Nos 93 – 95 High Street Teddington, the adjacent BTMs Nos 86 (west) and 100 High Street (east) or the wider Teddington High Street Character Area to the detriment of the overall character and appearance of the Teddington High Street Conservation Area. The scheme is therefore contrary to, in particular, NPPF Paragraphs 199, 202 & 203, Policies LP1, LP3 and LP4, LP33 of the LBRUT Local Plan (2018), Teddington High Street Conservation Area Statement 37, the Hampton Wick and Teddington Village Planning Guidance SPD and the Telecommunications Equipment SPD (June 2006).