

Application reference: 22/3747/TEL
TWICKENHAM RIVERSIDE WARD

Date application received	Date made valid	Target report date	8 Week date
21.12.2022	21.12.2022	14.02.2023	14.02.2023

Site:

Telecommunications Apparatus Outside, 383 - 391 Richmond Road, Twickenham,

Proposal:

The installation of a new 20m-high telecommunications monopole and 3no. ground-based equipment cabinets; and ancillary development thereto

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

APPLICANT NAME

Gallivan
450 Longwater Avenue
Reading
RG2 6GF
United Kingdom

AGENT NAME

mr Tom Gallivan
14
Inverleith Place
Edinburgh
EH3 5PZ

DC Site Notice: printed on 28.12.2022 and posted on 06.01.2023 and due to expire on 27.01.2023

Consultations:

Internal/External:

Consultee

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

Expiry Date

17.01.2023
11.01.2023
11.01.2023

Neighbours:

12 Richmond Mansions, Denton Road, Twickenham, TW1 2HH -
8 BARON'S COURT ROAD, LONDON, W14 9DT -
5 Old House Gardens, Park Road, Twickenham, TW1 2QB -
Flat 1, 358 Richmond Road, Twickenham, -
57 NAPIER ROAD, ISLEWORTH, TW7 7HP -
3 Langham Court, Park Road, Twickenham, TW1 2PS -
Flat 2, Oak House, 42 Melliss Avenue, Kew, Richmond, TW9 4BE -
32 Sheringham Avenue, Twickenham, TW2 6AW -
Flat 4, Phelps House, 133A St Margarets Road, Twickenham, TW1 1RG -
43 Morley Road, Twickenham, TW1 2HG -
27 Cresswell Road, Twickenham, TW1 2EA -
30 Cambridge Park Court, Cambridge Park, Twickenham, TW1 2JN -
50 Park House Gardens, Twickenham, TW1 2DE -
55 Park House Gardens, Twickenham, TW1 2DF -
9 VALROY CLOSE, CAMBERLEY, GU15 3TL -
40 Park Road, Twickenham, TW1 2PX -

Flat B,32 Morley Road,Twickenham,TW1 2HF -
36 Gordon Avenue,Twickenham,TW1 1NQ -
113 Haliburton Road,Twickenham,TW1 1PE -
3 Jocelyn Road,Richmond,TW9 2TJ -
37 TALBOT ROAD,ISLEWORTH,TW7 7HG -
Flat 43,Meadowside,Cambridge Park,Twickenham,TW1 2JQ -
9 Orchard Road,Twickenham,TW1 1LX -
33A Morley Road,Twickenham, -
12 Richmond Bridge Mansions,Willoughby Road,Twickenham,TW1 2QJ -
4 Richmond Bridge Mansions,Willoughby Road,Twickenham,TW1 2QJ -
30D Cambridge Park,Twickenham,TW1 2JL -
11 Richmond Bridge Mansions,Willoughby Road,Twickenham,TW1 2QJ -
139 Amyand Park Road,Twickenham,TW13HN -
46 Morley Road,Twickenham,TW1 2HF -
59 Park House Gardens,Twickenham,TW1 2DF -
25 Morley Road,Twickenham,TW1 2HG -
7 Eminence House,76 Lower Mortlake Road,Richmond,TW9 2AB -
Flat 48,Meadowside,Cambridge Park,Twickenham,TW1 2JQ -
33 Dunstable Road,Richmond,TW9 1UH -
32 Carisbrooke House,Courtlands,Richmond,TW10 5AZ -
139 HARTHAM ROAD,ISLEWORTH,TW7 5EZ -
4 Claremont Road,Twickenham,TW1 2QY -
Flat 6,121 Heath Road,Twickenham,TW1 4BF -
5 Beaulieu Close,Twickenham,TW1 2JR -
12 CLIFFORD GARDENS,SHIREHAMPTON,BRISTOL,BS11 0EE -
Top Flat,323 Richmond Road,Twickenham,TW1 2PB -
9 Sandycombe Road,Twickenham,TW1 2LU -
1,MIDDLESEX COURT,BRITISH GROVE,CHISWICK,LONDON,W4 2NJ -
106 Heathcote Road,Twickenham,TW1 1SD -
FLAT 17,LION COURT,LION WHARF ROAD,ISLEWORTH,TW7 6XX -
23A Cresswell Road,Twickenham,TW1 2EA -
Wharf house,2 brewery lane,London,Tw11 ax -
52 St Margarets Road,Twickenham,TW1 2LP -
8 Kings Road,Twickenham,TW1 2QS -
127 Warren Road,Twickenham,TW2 7DJ -
24 Kings Road,Twickenham,TW1 2QS -
14 Haversham Close,Twickenham,TW1 2JP -
4 Trevelyan House,Arlington Road,Twickenham,TW1 2AS -
6 Kings Road,Twickenham,TW1 2QS -
17 Kings Road,Twickenham,TW1 2QS -
2 Nicol Close,Twickenham,TW1 1RP -
14 Alexandra Road,Twickenham,TW1 2HE -
30 Kings Road,Twickenham,TW1 2QS -
2 St Margarets Road,Twickenham,TW1 2LW -
36 EVE ROAD,ISLEWORTH,TW7 7HS -
2 Cambridge Park Court,Cambridge Park,Twickenham,TW1 2JN -
FLAT 21,LION COURT,LION WHARF ROAD,ISLEWORTH,TW7 6XX -
32 Petersham Road,Richmond,TW10 6UW -
18 Ellesmere Road,Twickenham,TW1 2DL -
Flat 2,14 Riverdale Road,Twickenham,TW1 2BS -
43 BOROUGH ROAD,ISLEWORTH,TW7 5DT -
83 Fifth Cross Road,Twickenham,TW2 5LJ -
9 Ellesmere Road,Twickenham,TW1 2DJ -
3 Cambridge Park Court,Cambridge Park,Twickenham,TW1 2JN -
94 WOODLANDS ROAD,ISLEWORTH,TW7 6JY -
Flat 14,Bevan Court,31 Clevedon Road,Twickenham,TW1 2TS -
20 St Margarets Road,Twickenham,TW1 2LW -
36 PREBEND GARDENS,CHISWICK,LONDON,W4 1TW -
Linden Corner,Rosslyn Road,Twickenham,TW1 2AR -
28 Cresswell Road,Twickenham,TW1 2DZ -

25 Grove Terrace, Teddington, TW11 8AU -
26 Riverdale Gardens, Twickenham, TW1 2BZ -
39 Haggard Road, Twickenham, TW1 3AL -
59 Petersham Road, Richmond, TW10 6UT -
25 Ellesmere Road, Twickenham, TW1 2DJ -
15 St Georges Road, Twickenham, TW1 1QS -
1 Arlington Close, Twickenham, TW1 2BE -
First Floor Flat, 6 Cambridge Park, Twickenham, TW1 2PF -
3 Leicester Court, 24 Clevedon Road, Twickenham, TW1 2TB -
29 Alexandra Road, Twickenham, TW1 2HE -
18 Turner House, 26 Clevedon Road, Twickenham, TW1 2TE -
Basement Flat, 28 Crown Road, Twickenham, TW1 3EE -
5 Powers Court, Twickenham, -
34 Denton Road, Twickenham, TW1 2HQ -
19 Warwick Close, Hampton, TW12 2TZ -
Top Floor Flat Rear, 31 Cresswell Road, Twickenham, TW1 2EA -
15 South Western Road, Twickenham, TW1 1LG -
14 Cresswell Road, Twickenham, TW1 2DZ -
12 Winchester House, Cambridge Park, Twickenham, TW1 2JG -
41 WORPLE ROAD, ISLEWORTH, TW7 7AT -
25 Cambridge Road, Twickenham, TW1 2HN -
FLAT 18, OLIVER COURT 1, DRAYMANS WAY, ISLEWORTH, TW7 6SX -
Flat 7, Riverside House, Railshead Road, Twickenham, Isleworth, TW7 7BY -
39 Arlington Road, Twickenham, TW1 2AZ -
11 Beresford Avenue, Twickenham, TW12PY -
26 Park Road, Twickenham, TW1 2PX -
6A Denton Road, Twickenham, TW1 2HQ -
13 TALBOT ROAD, ISLEWORTH, TW7 7HG -
1B Cresswell Road, Twickenham, TW1 2EA -
17 Ravensbourne Road, Twickenham, TW1 2DG -
8 Alexandra Road, Twickenham, TW1 2HE -
FLAT 48, LION COURT, LION WHARF ROAD, ISLEWORTH, TW7 6XX -
BLK02 49 TO 70, HILLARY DRIVE, ISLEWORTH, TW7 7EG -
57 Grosvenor Road, Twickenham, TW1 4AD -
89 Cole Park Road, Twickenham, TW1 1HX -
24 Riverdale Gardens, Twickenham, TW1 2BZ -
10 Langham Court, Park Road, Twickenham, TW1 2PS -
17 Morley Road, Twickenham, TW1 2HG -
68, 68 Northcote Road, Twickenham, TW1 1PA -
Mallard House, Willoughby Road, Twickenham, TW1 2QE -
32 Ravensbourne Road, Twickenham, TW1 2DQ -
The Bungalow, Beresford Court, Park Road, Twickenham, TW1 2PU -
28 Park House Gardens, Twickenham, TW1 2DE -
33 PARK ROAD, EAST TWICKENHAM, TW1 2QD -
Houseboat Sunray, 9 Ducks Walk, Twickenham, TW1 2DD -
8 Morley Road, Twickenham, TW1 2HF -
15 Ellesmere Road, Twickenham, TW1 2DJ -
11 Ellesmere Road, Twickenham, TW1 2DJ -
3 Kings Road, Twickenham, TW1 2QS -
106F Richmond Hill, Richmond, TW10 6RJ -
18 Park House Gardens, Twickenham, TW1 2DE -
176 WORTON ROAD, ISLEWORTH, TW7 6EP -
14 Park House Gardens, Twickenham, TW1 2DE -
2 Queens Keep, Park Road, Twickenham, TW1 2QA -
7 The Greenways, South Western Road, Twickenham, TW1 1LH -
20 Arlington Court, Arlington Road, Twickenham, TW1 2AU -
First Floor Flat, 9 St Margarets Road, Twickenham, TW1 2LN -
10 Beresford Court, Park Road, Twickenham, TW1 2PU -
Garden Flat, 12 Cambridge Park, Twickenham, TW1 2PF -
15 Kings Road, Twickenham, TW1 2QS -

Ground Floor Flat,39 Morley Road,Twickenham,TW1 2HG -
6A King Street,Richmond,TW9 1ND -
19 Kings Road,Twickenham,TW1 2QS -
18 Cambridge Road,Twickenham,TW1 2HL -
13 Park Road,Twickenham,TW1 2QD -
15 Beaulieu Close,Twickenham,TW1 2JR -
17 Mereway Road,Twickenham,TW2 6RF -
54 Cambridge Road,Twickenham,TW1 2HL -
2 Arlington Road,Twickenham,TW1 2BG -
Old Ham Lodge,Ham Street,Ham,Richmond,TW10 7HA -
5 Kings Road,Twickenham,TW1 2QS -
10 Kilmorey Gardens,Twickenham,TW1 1PY -
1 Ravensbourne Road,Twickenham,TW1 2DG -
7 Kings Road,Twickenham,TW1 2QS -
23 Alexandra Road,Twickenham,TW1 2HE -
16 Kings Road,Twickenham,TW1 2QS -
55 WOODLAND GARDENS,ISLEWORTH,TW7 6LW -
69 Cole Park Road,Twickenham,TW1 1HT -
23 Court Close,Twickenham,TW2 5JH -
25 Rosedale Road,Richmond,TW92SX -
1 Cresswell Road,Twickenham,TW12EA -
34 Morley Road,Twickenham,TW1 2HF -
60 Morley Road,Twickenham,TW1 2HF -
22 Alexandra Road,Twickenham,TW1 2HE -
13 Ryde Place,Twickenham,TW1 2EH -
C,313 Richmond road,Twickenham,TW1 2PB -
Bute Lodge,Park Road,Twickenham,TW1 2PT -
27 Morley Road,Twickenham,TW1 2HG -
68 Northcote Road,Twickenham,TW1 1PA -
7A Fairlawns,Twickenham,TW1 2JY -
75 The Vineyard,Richmond,TW10 6AS -
9 KINGS TERRACE,ISLEWORTH,TW7 7AW -
91B St Margarets Road,Twickenham,TW1 2LJ -
11 Cambridge Road,Twickenham,TW1 2HN -
46 Beaconsfield Road,Twickenham,TW1 3HU -
24 St Margarets Road,Twickenham,TW1 2LW -
1D Cambridge Road,Twickenham,TW1 2HN -
12 Park Road,Twickenham,TW1 2PX -
19 Old Deer Park Gardens,Richmond,TW9 2TN -
8A Ducks Walk,Twickenham,TW1 2DD -
15 Jocelyn Road,Richmond,TW9 2TJ -
18 Cresswell Road,Twickenham,TW1 2DZ -
28 Beresford Avenue,Twickenham,TW1 2PY -
10 Blenheim Court,Stanmore Road,Richmond,TW9 2DA -
The Hermitage,Petersham Road,Petersham,Richmond,TW10 7AW -
6 Fairlawns,Twickenham,TW1 2JY -
31 St Stephens Gardens,Twickenham,TW1 2LT -
105 Cambridge Road,Teddington,TW11 8DF -
23 Beresford Avenue,Twickenham,TW1 2PY -
Top Flat,20 Cresswell Road,Twickenham,TW1 2DZ -
Salix House,Willoughby Road,Twickenham,TW1 2QG -
16 Queens Keep,Park Road,Twickenham,TW1 2QA -
8 Cambridge Park Court,Cambridge Park,Twickenham,TW1 2JN -
92 Amyand Park Road,Twickenham,TW1 3HH -
8 Park Road,Twickenham,TW1 2PX -
4 Alexandra Road,Twickenham,TW1 2HE -
9 Queens Keep,Park Road,Twickenham,TW1 2QA -
8 Richmond Bridge Mansions,Willoughby Road,Twickenham,TW1 2QJ -
94 Petersham Road,Richmond,TW10 6UU -
2 Russell Villas,Willoughby Road,Twickenham,TW1 2QG -

Community Centre,13 Rosslyn Road,Twickenham,TW1 2AR -
7 Old House Gardens,Park Road,Twickenham,TW1 2QB -
5 Alexandra Road,Twickenham,TW1 2HE -
3 Park House Gardens,Twickenham,TW1 2DF -
56 Park House Gardens,Twickenham,TW1 2DE -
1 petit gouzil,saint ferme,33580 France -
10 Park Road,Twickenham,TW1 2PX -
41 Breamwater Gardens,Ham,Richmond,TW10 7SF -
20 Alexandra Road,Twickenham,TW1 2HE -
61 Morley Road,Twickenham,TW1 2HG -
15 STEELE ROAD,ISLEWORTH,TW7 7HL -
17 Ailsa Road,Twickenham,TW1 1QJ -
54A,Halford Road,Richmond,TW10 6AP -
6 Shaftesbury Road,Richmond,TW9 2TD -
49 Morley Road,Twickenham,TW1 2HG -
7B Parkshot,Richmond,TW9 2RD -
Flat 6,43 Cambridge Road,Twickenham,TW1 2TX -
17 Ashley Road,Richmond,TW9 2TG -
16 Beresford Avenue,Twickenham,TW1 2PY -
33 Darling House,35 Clevedon Road,Twickenham,TW1 2TU -
3 Richmond Bridge Mansions,Willoughby Road,Twickenham,TW1 2QJ -
18 Ryde Place,Twickenham,TW1 2EH -
29 Lower Mortlake Road,Richmond,TW9 2LR -
23 Riverdale Gardens,Twickenham,TW1 2BX -
10 Ravensbourne Road,Twickenham,TW1 2DH -
28 Somerton Avenue,Richmond,TW9 4QP -
80 St Margarets Road,Twickenham,TW1 2LP -
32 Steele Road,Isleworth,Hounslow,TW7 7HN -
19 Richmond Bridge Mansions,Willoughby Road,Twickenham,TW1 2QJ -
13 Old Deer Park Gardens,Richmond,TW9 2TN -
26 Beresford Avenue,Twickenham,TW1 2PY -
66 Northcote Road,Twickenham,TW1 1PA -
7 St Johns Road,Richmond,TW9 2PE -
4 Park Road,Twickenham,TW1 2PX -
22 Beresford Avenue,Twickenham,TW1 2PY -
16 Lebanon Park,Twickenham,TW1 3DG -
13A St Stephens Gardens,Twickenham,TW1 2LT -
Flat 2,12 Riverdale Road,Twickenham,TW1 2BS -
Bream House,Willoughby Road,Twickenham,TW1 2QG -
3 Ducks Walk,Twickenham,TW1 2DD -
First Floor Flat,10 Cambridge Park,Twickenham,TW1 2PF -
14 Morley Road,Twickenham,TW1 2HF -
52 Chertsey Court,Clifford Avenue,East Sheen,London,SW14 7RD -
18 Beresford Court,Park Road,Twickenham,TW1 2PU -
21 Richmond Bridge Mansions,Willoughby Road,Twickenham,TW1 2QJ -
339 Staines Road,Twickenham,TW2 5AU -
11 Park House Gardens,Twickenham,TW1 2DF -
Flat 1,5 Riverdale Road,Twickenham,TW1 2BT -
Maisonette,Second And Third Floors,6 Cambridge Park,Twickenham,TW1 2PF -
9 Vivienne Close,Twickenham,TW1 2JX -
87 THE GROVE,ISLEWORTH,TW7 4JD -
8 York House,Courtlands,Richmond,TW10 5BD -
4 DAWES AVENUE,ISLEWORTH,TW7 7JT -
3 Yelverton Lodge,Richmond Road,Twickenham,TW1 2NW -
23 Norman Avenue,Twickenham,TW1 2LY -
39E Cambridge Park,Twickenham,TW1 2JU -
Flat 1,32 The Avenue,Twickenham,TW1 1RY -
39A The Avenue,Twickenham,TW1 1QU -
183 Petersham Road,Petersham,Richmond,TW10 7AW -
Flat 3,77 Petersham Road,Richmond,TW10 6UT -

28 Park Road, Twickenham, TW1 2PX -
10A Denton Road, Twickenham, TW1 2HQ -
75 St Margarets Grove, Twickenham, TW1 1JF -
11 Alexandra Road, Twickenham, TW1 2HE -
3 Beaulieu Close, Twickenham, TW1 2JR -
11 Vivienne Close, Twickenham, TW1 2JX -
30 St Margarets Road, Twickenham, TW1 2LW -
44 Morley Road, Twickenham, TW1 2HF -
14 Park Road, Twickenham, TW1 2PX -
25 Garden Road, Richmond, TW9 4NR -
35 Morley Road, Twickenham, TW1 2HG -
10 Morley Road, Twickenham, TW1 2HF -
23 Morley Road, Twickenham, TW1 2HG -
Flat 8, Hatfield House, 40 Cambridge Park, Twickenham, TW1 2JU -
39 Haliburton Road, Twickenham, TW1 1PD -
39 The Avenue, Twickenham, TW1 1QU -
8 Beresford Court, Park Road, Twickenham, TW1 2PU -
11 TEESDALE GARDENS, ISLEWORTH, TW7 6AT -
2 Poplar Court, Richmond Road, Twickenham, TW1 2DS -
7 Evelyn Gardens, Richmond, TW9 2PL -
25 Riverdale Gardens, Twickenham, TW1 2BX -
13 Haliburton Road, Twickenham, TW1 1PD -
38 Godstone Road, Twickenham, TW1 1JX -
17 Cresswell Road, Twickenham, TW1 2EA -
183 Petersham Road, Richmond, TW107AW -
5 Park House Gardens, Twickenham, TW1 2DF -
13 Morley Road, Twickenham, TW1 2HG -
22 Park House Gardens, Twickenham, TW1 2DE -
39 Park House Gardens, Twickenham, TW1 2DF -
21 PERCHERON CLOSE, ISLEWORTH, TW7 6SS -
38 Park House Gardens, Twickenham, TW1 2DE -
33 Arlington Road, Twickenham, TW1 2AZ -
11 Ailsa Road, Twickenham, TW1 1QJ -
12 Park House Gardens, Twickenham, TW1 2DE -
142 ST STEPHENS ROAD, HOUNSLOW, TW3 2BW -
1B Ducks Walk, Twickenham, TW1 2DD -
26 Morley Road, Twickenham, TW1 2HF -
Flat 4, Green Hedges, Riverdale Gardens, Twickenham, TW1 2BU -
31 Morley Road, Twickenham, TW1 2HG -
49 2 brewery lane, Twickenham, London, Tw1 1 ax -
30 Morley Road, Twickenham, TW1 2HF -
38C Cambridge Park, Twickenham, TW1 2JU -
9 Ryde Place, Twickenham, TW1 2EH, - 28.12.2022
7 Ryde Place, Twickenham, TW1 2EH, - 28.12.2022
4 Ryde Place, Twickenham, TW1 2EH, - 28.12.2022
2 Ryde Place, Twickenham, TW1 2EH, - 28.12.2022
8 Ryde Place, Twickenham, TW1 2EH, - 28.12.2022
6 Ryde Place, Twickenham, TW1 2EH, - 28.12.2022
5 Ryde Place, Twickenham, TW1 2EH, - 28.12.2022
3 Ryde Place, Twickenham, TW1 2EH, -
1 Ryde Place, Twickenham, TW1 2EH, - 28.12.2022
402 Richmond Road, Twickenham, TW1 2EB, - 28.12.2022
404 Richmond Road, Twickenham, TW1 2EB, - 28.12.2022
22 Morley Road, Twickenham, TW1 2HF -
21 Halford Road, Richmond, TW10 6AW -
Flat 8, St Margarets Court, The Barons, Twickenham, TW1 2AL -
6 Talbot Road, Isleworth, TW7 7HH -
25 Alexandra Road, Twickenham, TW1 2HE -
14 Reynolds Place, Richmond, TW10 6JZ -
15 HARTLAND ROAD, ISLEWORTH, TW7 6RH -

24 Cambridge Road, Twickenham, TW1 2HL -
Flat 1a, Arlington House, 3 Rosslyn Road, Twickenham, TW1 2AR -
24 Park Road, Twickenham, TW1 2PX -
35 BOROUGH ROAD, ISLEWORTH, TW7 5DT -
6B Cambridge Court, Clevedon Road, Twickenham, TW1 2HT -
,, -
6 Rolandson Court, Kilmorey Road, Twickenham, TW1 1QF -
54 Chertsey Road, Twickenham, TW1 1JQ -
7 GROVE ROAD, ISLEWORTH, TW7 4JJ -
20 Chertsey Road, Twickenham, TW1 1JQ -
165 Lower Mortlake Road, Richmond, TW9 2LP -
7 Powers Court, Cambridge Park, Twickenham, TW1 2JJ -
39D Cambridge Park, Twickenham, TW1 2JU -
Flat 1, 50 Denton Road, Twickenham, TW1 2HQ -
Hall Flat, 314A Richmond Road, Twickenham, TW1 2PD -
6 Westbourne House, Richmond Road, Twickenham, TW1 3AS -
15 Alexandra Road, Twickenham, TW1 2HE -
24 Arlington Road, Twickenham, TW1 2BG -
70 WHITE LODGE CLOSE, ISLEWORTH, TW7 6TR -
40 CHURCH STREET, ISLEWORTH, TW7 6BG -
37 Cambridge Park, Twickenham, TW1 2JU -
56 Morley Road, Twickenham, TW1 2HF -
31 Park Road, Twickenham, TW1 2QD -
Flat 32, Meadowside, Cambridge Park, Twickenham, TW1 2JQ -
58 BANKSIDE CLOSE, ISLEWORTH, TW7 7EW -
36 Park Road, Twickenham, TW1 2PX -
Flat 1, 11 The Barons, Twickenham, TW1 2AN -
13 Park House Gardens, Twickenham, TW1 2DF -
27 Park House Gdns, Twickenham, TW1 2DF -
16 Park House Gardens, Twickenham, TW1 2DE -
21 Park House Gardens, Twickenham, TW1 2DF -
Flat 6, Blanchard House, 28 Clevedon Road, Twickenham, TW1 2TD -
22 Riverdale Gardens, Twickenham, TW1 2BZ -
54 Park House Gardens, Twickenham, TW1 2DE -
3 Ellesmere Road, Twickenham, TW1 2DJ -
66 Park House Gardens, Twickenham, TW1 2DE -
13 Ellesmere Road, Twickenham, TW1 2DJ -
29 Riverdale Gardens, Twickenham, TW1 2BX -
2 Vivienne Close, Twickenham, TW1 2JX -
Flat 26, Meadowside, Cambridge Park, Twickenham, TW1 2JQ -
10 Cross Deep Gardens, Twickenham, TW1 4QU -
2 MILL PLAT, ISLEWORTH, TW7 6DY -
9 Sion Road, Twickenham, TW1 3DR -
43 Park House Gardens, Twickenham, TW1 2DF -
53 Haliburton Road, Twickenham, TW1 1PD -
33 Haggard Road, Twickenham, TW1 3AL -
15 Atwood Avenue, Kew, Richmond, TW9 4HF -
15 Woburn Court, Stanmore Road, Richmond, TW9 2DD -
29 Cambridge Park, Twickenham, TW1 2JL -
25 Park House Gardens, Twickenham, TW1 2DF -
17 Arlington Court, Arlington Road, Twickenham, TW1 2AU -
68A, Sidney Road, Twickenham, TW1 1JR -
11 Winchester House, Cambridge Park, Twickenham, TW1 2JG -
46 Sidney Road, Twickenham, TW1 1JR -
71 South Western Road, St Margarets, London, Tw11lg -
23 Park House Gardens, Twickenham, TW1 2DF -
45 Park House Gardens, Twickenham, TW1 2DF -
17 Park House Gardens, Twickenham, TW1 2DF -
171 Richmond Road, Twickenham, TW1 3AT -
1 Artichoke Walk, Richmond, TW9 1BE -

4, Cambridge park Court, Cambridge Park, Twickenham, TW1 2JN -
4 Cambridge Park Court, Cambridge Park, Twickenham, TW1 2JN -
48 Cresswell Road, Twickenham, TW1 2DZ -
19B, BOROUGH ROAD, ISLEWORTH, TW7 5DT -
Arlington House, 3 Rosslyn Road, Twickenham, TW1 2AR -
47 Beaconsfield Road, Twickenham, TW1 3HX -
Flat 1, Hatfield House, 40 Cambridge Park, Twickenham, TW1 2JU -
23 Vivienne Close, Twickenham, TW1 2JX -
15 Haversham Close, Twickenham, TW1 2JP -
16 Morley Road, Twickenham, TW1 2HF -
7 Haversham Close, Twickenham, TW1 2JP -
202C St Margarets Road, Twickenham, TW1 1NP -
60 Park House Gardens, Twickenham, TW1 2DE -
16 Ellesmere Road, Twickenham, TW1 2DL -
19 Beresford Avenue, Twickenham, TW1 2PY -
18 Vivienne Close, Twickenham, TW1 2JX -
4 QUEENS TERRACE, ISLEWORTH, TW7 7DB -
Ground Floor, 41 Montague Road, Richmond, TW10 6QJ -
87 Queens Road, Twickenham, TW1 4EU -
5 Vivienne Close, Twickenham, TW1 2JX -
The Mews, 155 Kew Road, Richmond, TW9 2PN -
Flat 2, Trinder House, 14 Hill Rise, Richmond, TW10 6UA -
16 Beresford Court, Park Road, Twickenham, TW1 2PU -
36 Park House Gardens, Twickenham, TW1 2DE -
Flat 17, SignalHouse, 76 London Road, Twickenham, TW1 1FB -
Ranelagh Cottage Adjacent To, 7 Ailsa Road, Twickenham, TW1 1QJ -
Flat 4, 10 Riverdale Road, Twickenham, TW1 2BS -
Flat 3, River Court, 21-23 Richmond Hill, Richmond, TW10 6QY -
404B Richmond Road, Twickenham, TW1 2EB, - 28.12.2022
404A Richmond Road, Twickenham, TW1 2EB, - 28.12.2022
402D Richmond Road, Twickenham, TW1 2EB, - 28.12.2022
402C Richmond Road, Twickenham, TW1 2EB, - 28.12.2022
402B Richmond Road, Twickenham, TW1 2EB, -
402A Richmond Road, Twickenham, TW1 2EB, - 28.12.2022
Deer Park School, 389 Richmond Road, Twickenham, TW1 2EF, -
383 Richmond Road, Twickenham, TW1 2EF, - 28.12.2022
Flat 4, 380B Richmond Road, Twickenham, TW1 2DX, - 28.12.2022
Flat 3, 380B Richmond Road, Twickenham, TW1 2DX, - 28.12.2022
398A Richmond Road, Twickenham, TW1 2DY - 28.12.2022
394A Richmond Road, Twickenham, TW1 2DY - 28.12.2022
392B Richmond Road, Twickenham, TW1 2DY - 28.12.2022
400B Richmond Road, Twickenham, TW1 2DY, - 28.12.2022
396B Richmond Road, Twickenham, TW1 2DY, - 28.12.2022
386C Richmond Road, Twickenham, TW1 2DY, -
386A Richmond Road, Twickenham, TW1 2DY, - 28.12.2022
382B Richmond Road, Twickenham, TW1 2DY, - 28.12.2022
381A Richmond Road, Twickenham, TW1 2EF, - 28.12.2022
400 Richmond Road, Twickenham, TW1 2DY, - 28.12.2022
393 Richmond Road, Twickenham, TW1 2EF, - 28.12.2022
379 Richmond Road, Twickenham, TW1 2EF, - 28.12.2022
396 Richmond Road, Twickenham, TW1 2DY, - 28.12.2022
392 Richmond Road, Twickenham, TW1 2DY, - 28.12.2022
386 Richmond Road, Twickenham, TW1 2DY, - 28.12.2022
382 Richmond Road, Twickenham, TW1 2DY, -
394C Richmond Road, Twickenham, TW1 2DY, - 28.12.2022
Flat 2, 380A Richmond Road, Twickenham, TW1 2DX - 28.12.2022
Flat 1, 380A Richmond Road, Twickenham, TW1 2DX - 28.12.2022
381B Richmond Road, Twickenham, TW1 2EF - 28.12.2022
2A Morley Road, Twickenham, TW1 2HF, - 28.12.2022
394B Richmond Road, Twickenham, TW1 2DY, - 28.12.2022

398B Richmond Road, Twickenham, TW1 2DY, - 28.12.2022
390 Richmond Road, Twickenham, TW1 2DY, - 28.12.2022
394 Richmond Road, Twickenham, TW1 2DY, - 28.12.2022
388 Richmond Road, Twickenham, TW1 2DY, - 28.12.2022
398 Richmond Road, Twickenham, TW1 2DY, - 28.12.2022
380 Richmond Road, Twickenham, TW1 2DX, - 28.12.2022
Flat 1, 388 Richmond Road, Twickenham, TW1 2DY, - 28.12.2022
381 Richmond Road, Twickenham, TW1 2EF, - 28.12.2022
384 Richmond Road, Twickenham, TW1 2DY, - 28.12.2022
400A Richmond Road, Twickenham, TW1 2DY, - 28.12.2022
396A Richmond Road, Twickenham, TW1 2DY, - 28.12.2022
386D Richmond Road, Twickenham, TW1 2DY, -
386B Richmond Road, Twickenham, TW1 2DY, - 28.12.2022
384B Richmond Road, Twickenham, TW1 2DY, - 28.12.2022
384A Richmond Road, Twickenham, TW1 2DY, - 28.12.2022
2 Winchester House, Cambridge Park, Twickenham, TW1 2JG -
12 Beaulieu Close, Twickenham, TW1 2JR -
1 Maids Of Honour Row, Richmond, TW9 1NY -
7 Morley Road, Twickenham, TW1 2HG -
FLAT 10, BRIDGE HOUSE 3, LONDON ROAD, BRENTFORD, TW8 8GF -
62 Park House Gardens, Twickenham, TW1 2DE -
7 AVENUE ROAD, ISLEWORTH, TW7 4JL -
62 Morley Road, Twickenham, TW1 2HF -
41A Cresswell Road, Twickenham, TW1 2EA -
119 THORNBURY ROAD, ISLEWORTH, TW7 4ND -
6 Park House Gardens, Twickenham, TW1 2DE -
382A Richmond Road, Twickenham, TW1 2DY, - 28.12.2022
379A Richmond Road, Twickenham, TW1 2EF, - 28.12.2022
Flat 5, 390A Richmond Road, Twickenham, TW1 2DY, - 28.12.2022
Flat 4, 390A Richmond Road, Twickenham, TW1 2DY, - 28.12.2022
Flat 3, 390A Richmond Road, Twickenham, TW1 2DY, - 28.12.2022
Flat 2, 390A Richmond Road, Twickenham, TW1 2DY, - 28.12.2022
Flat 1, 390A Richmond Road, Twickenham, TW1 2DY, - 28.12.2022
Flat 3, 388 Richmond Road, Twickenham, TW1 2DY, - 28.12.2022
Flat 2, 388 Richmond Road, Twickenham, TW1 2DY, - 28.12.2022
33 Park House Gardens, Twickenham, TW1 2DF -
13 Beaulieu Close, Twickenham, TW1 2JR -
Flat 31, Queens House, 6 Holly Road, Twickenham, TW1 4EG -
12 Cambridge Road, Twickenham, TW1 2HL -
17 The Vineyard, Richmond, TW10 6AQ -
9 Beaulieu Close, Twickenham, TW1 2JR -
55 NAPIER ROAD, ISLEWORTH, TW7 7HP -
20 Haversham Close, Twickenham, TW1 2JP -
1 Victoria Road, Twickenham, TW1 3HW -
27 Laurel Avenue, Twickenham, TW1 4HZ -
6 Beaulieu Close, Twickenham, TW1 2JR -
13 Haversham Close, Twickenham, TW1 2JP -
18 Morley Road, Twickenham, TW1 2HF -
19 Riverdale Gardens, Twickenham, TW1 2BX -
10 Park House Gardens, Twickenham, TW1 2DE -
9 Manor Grove, Richmond, TW9 4QE -
24 Park House Gardens, Twickenham, TW1 2DE -
55 Cresswell Road, Twickenham, TW1 2EA -

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

Development Management

Status: PCO

Date:

Application: 22/3747/TEL

The installation of a new 20m-high telecommunications monopole and 3no. ground-based equipment cabinets; and ancillary

development thereto

Development Management

Status: WDN

Date:23/12/2022

Application:22/3760/TEL

The installation of a new 20m-high telecommunications monopole and 3no. ground-based equipment cabinets; and ancillary development thereto

Application Number	22/2228/TEL
Address	Telecommunications Apparatus Outside 383 - 391 Richmond Road Twickenham
Proposal	The installation of a new 20m-high telecommunications monopole and 3no. ground-based equipment cabinets; and ancillary development thereto
Contact Officer	Jack Davies
Target Determination Date	14/02/2023

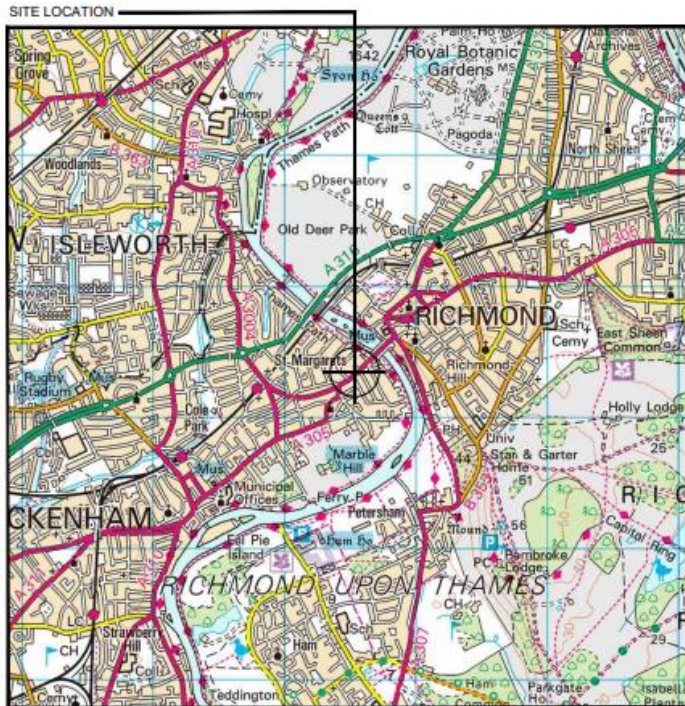
1. INTRODUCTION

This application is of a nature where the Council's Constitution delegates the authority to make the decision to Officers rather than it being determined by the Planning Committee.

By indicating that the development proposal complies with the relevant provisions of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) the planning officer is taking into account the information submitted with the application, material planning considerations raised within any representations received relevant to the assessment against Part 16 of the legislation and any previous relevant applications.

2. DESCRIPTION OF THE SITE

The application site is located on the pavement located on the northern side of Richmond Road, adjacent to the entrance to Deer Park School and near to the Lidl. The site is located within the Richmond Road East Twickenham Conservation area and is within proximity to Old Ryde House which is a Listed Building and is on the approach to Grade 1 Listed Richmond Bridge. The site is located in an area designated within Floodzones 2, 3 and 3a and a Critical Drainage Area.



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3. DESCRIPTION OF THE PROPOSAL AND ANY RELEVANT PLANNING HISTORY

The proposal is for the installation of a new 20m monopole tower and 3no. ground-based equipment cabinets; and ancillary development thereto

There is no relevant planning history on this site.

In the wider surrounds, the following is considered relevant:

Sites along Richmond Road

Telecommunications Apparatus Footpath To The Front Of Leeson House, Richmond Road

21/4056/TEL - The installation of a 15-metre-high monopole, 4 no. equipment cabinets and development work ancillary thereto. **Refused**

Reasons:

The application fails to demonstrate that the proposal would comply with International Commission guidance. As such, the application fails to comply with outcomes sought in Paras. 117 of the NPPF (2021), policy LP33 of the Local Plan (2018) and the Council's, 'Telecommunications Equipment' Supplementary Planning Document (June 2006).

Under schedule 2, Part 16 of the General Permitted Development Order 2015 (as amended), the Local Planning authority has determined that prior approval is required and hereby REFUSED as to the siting and appearance of the proposed development for the following reason:

The proposed 15 m monopole and associated equipment, due to its prominent siting, height and bulbous appearance result in an unduly dominant, incongruous and visually intrusive form of development that would adversely affect the character, appearance and visual amenity of the streetscene in general and also to the setting of the Twickenham Riverside Conservation Area, adjacent Other Open Land of Townscape Importance (OOLTI) and areas of Metropolitan Open Land (MOL) to the south of it due to its highly visible siting. Insufficient information has been provided for the purposes of assessing the impact of construction activities on nearby protected trees and thus fails to demonstrate that the scheme will protect and respect trees and landscape and thus the visual amenity of the locality and adjacent conservation area. The proposal would therefore be contrary to the NPPF (2021) and in particular policies LP1, LP3, LP8, LP13, LP14, LP16 and LP 33 of the Adopted Local Plan (2018) and associated policies of The London Plan (2021), the Telecommunications SPD, Twickenham Village Plan SPD and Twickenham Riverside Conservation Area Study & appraisal.

4. CONSULTATIONS CARRIED OUT

A site notice has been erected and adjoining neighbours have been consulted on the application. 538 x objections have been received and can be summarised as follows:

- Visually intrusive
- Harmful to Conservation Area
- Alter character of area
- Lack of evidential need for 5G
- Pedestrian safety issues
- Lack of ICNIRP document
- Health concerns
- Proximity to school
- Impact on Listed heritage assets
- Highway safety issues
- Risk to trees
- Noise
- Consultation issues
- Lack of alternative locations considered
- Impact on nearby artwork
- Inappropriate design and materials
- Congestion
- Fire safety issues for school
- Inappropriate location
- Impact to nearby BTMs
- Impact on landscape
- Not sympathetically designed
- Loss of sunlight / overshadowing

8 x observations have also been received. Most echoing the points raised above, however 2 x observations commented on the need for better communication services in the area.

5. ASSESSMENT AS TO WHETHER THE APPLICATION MEETS THE GPDO CRITERIA FOR PERMITTED DEVELOPMENT

The determination is made in relation to the provisions of Schedule 2, Part 16 of the Town and Country Planning (General Permitted Development) Order (as amended).

a) PERMITTED DEVELOPMENT

Under Class A ‘Electronic Communication Code Operators’, the following is permitted development:

A. Development by or on behalf of an electronic communications code operator for the purpose of the operator’s electronic communications network in, on, over or under land controlled by that operator or in accordance with the electronic communications code, consisting of—

- (a) the installation, alteration or replacement of any electronic communications apparatus,
- (b) the use of land in an emergency for a period not exceeding 18 months to station and operate moveable electronic communications apparatus required for the replacement of unserviceable electronic communications apparatus, including the provision of moveable structures on the land for the purposes of that use, or
- (c) development ancillary to radio equipment housing.

This is subject to the following:

Ground based apparatus		Complies	
A.1 (1) Development consisting of the installation, alteration or replacement of electronic communications apparatus (other than on a building) is not permitted by Class A(a) if -			
(c)	in the case of the installation of a mast, the mast, excluding any antenna, would exceed a height of— (i) 30 metres above ground level on unprotected land; or (ii) 25 metres above ground level on article 2(3) land or land which is on a highway;	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Development not permitted: Apparatus on masts		Complies	
(3)	Development consisting of the installation, alteration or replacement of electronic communications apparatus (other than an antenna) on a mast is not permitted by Class A(a) if the height of the mast (including the apparatus installed, altered or replaced) would exceed any relevant height limit specified in paragraph A.1(1)(c) or (d) or A.1(2)(a) or (b). For the purposes of applying the limit specified in paragraph A.1(2)(a), the words “taken by itself” in that paragraph are omitted.	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Development not permitted: radio equipment housing		Complies	
(9)	Development consisting of the installation, alteration or replacement of radio equipment housing is not permitted by Class A(a) if— (a) the development is not ancillary to the use of any other electronic communications apparatus; (b) the cumulative volume of such development would exceed 90 cubic metres or, if located on the roof of a building, the cumulative volume of such development would exceed 30 cubic metres; or (c) on any article 2(3) land, or on any land which is, or is within, a site of special scientific interest, any single development would exceed 2.5 cubic metres, unless the development is carried out in an emergency.	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

b) REQUIREMENT FOR PRIOR APPROVAL

A.2 (3) sets out the need for prior approval for Class A development. Prior approval is required for this development.

c) CONDITIONS FOR PRIOR APPROVAL

A.3 Prior Approval		Complies	
(1)	Before making the application required by sub-paragraph (4), the developer must give notice of the proposed development to— (a) any person (other than the developer) who is an owner of the land to which the development relates, or (b) a tenant of an agricultural holding any part of which is comprised in the land to which the application relates.	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

A copy of the developer’s notice is provided. This indicates that the requisite information has been inserted into a letter and sent to the landowner. However, in the absence of proof of delivery the applicant has failed to demonstrate that the notice has been served.

A.3 Prior Approval		Complies	
(2)	Notice must be given by or on behalf of the developer as follows— (a) by serving a signed and dated notice on every person described in sub-paragraph (1) whose name and address is known to the developer, stating— (i) the name of the developer; (ii) the address or location of the proposed development; (iii) a description of the proposed development (including its siting and appearance which includes the height of any mast); (iv) a statement that the developer will apply to the local planning authority for a determination as to whether the prior approval of the authority will be required as to the siting and appearance of the development; (v) the name and address of the local planning authority to whom the application will be made; (vi) a statement that the application is available for public inspection at the offices of the local planning authority during usual office hours; (vii) a statement that any person who wishes to make representations about the siting and appearance of the proposed development may do so in writing to the local planning authority; (viii) the date by which any such representations should be received by the local planning authority, being a date not less than 14 days from the date of the notice; and (ix) the address to which such representations should be made; or (b) if the developer has been unable to ascertain the names and addresses of every such person after taking reasonable steps, by local advertisement.	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

As above, a copy of the developer’s notice is provided. This indicates that the requisite information has been inserted into a letter and sent to the landowner. However, in the absence of proof of delivery the applicant has failed to demonstrate that the notice has been served.

A.3 Prior Approval		Complies	
(4)	Before beginning the development described in paragraph A.2(3), the developer must apply to the local planning authority for a determination as to whether the prior approval of the authority will be required as to the siting and appearance of the development.	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

This is the prior approval application to address this criterion.

A.3 Prior Approval		Complies	
(5)	The application must be accompanied by— (a) a written description of the proposed development and a plan indicating its proposed location together with any fee required to be paid; (b) the developer’s contact address, and the developer’s email address if the developer is content to receive communications electronically; (c) evidence that the requirements of sub-paragraph (1) have been satisfied where applicable; and (d) where the	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

	condition in paragraph A.2(5A) applies, evidence that the Civil Aviation Authority, the Secretary of State for Defence or the operator of the civil safeguarding area or defence safeguarding area, as the case may be, has been notified of the proposal.		
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Although a copy of the developer’s notice has been provided, the applicant has failed to provide any proof of delivery such as a Royal Mail receipt or email receipt. As such, the application has not met the requirements of A.3(5)(c).

7. ASSESSMENT OF DESIGN AND SITING

The GPDO requires that the developer must apply to the local planning authority for a determination as to whether the prior approval of the authority will be required as to the siting and appearance of the development. It is not a full planning application. As such, siting and appearance are the only considerations applicable in the assessment of an application which meets the criteria set out in the GPDO for this process, and not the principle of development.

(a) Design and visual impact / impact on designated / non-designated heritage assets

The NPPF (National Planning Policy Framework) advises good design is a key aspect of sustainable development and is indivisible from good planning and should contribute positively to making places better for people. Local Plan Policy LP1 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.

The NPPF states that there should be a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage asset the greater the presumption in favour of its conservation should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.

Local Plan Policy LP3 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.*

Policy LP 33 deals with telecommunications and states that the Council will promote the enhanced connectivity of the borough through supporting infrastructure for high speed broadband and telecommunications. The policy confirms that applications will be determined in accordance with national policy and guidance, that the sharing and utilization of existing structures will be encouraged but also that the visual impacts of telecommunications proposals should be minimised in accordance with policy LP 1.. The policy also requires confirmation that proposals will comply with the International Commission on Non-Ionizing Radiation Protection Guidelines (ICNIRP) for public exposure.

Objections have been received arguing that the chosen location is not suitable due to the potential impacts it would have on the character of the locality.

The scheme proposed under this application seeks permission for a 20m monopole with ancillary equipment. The monopole would be on the footpath located on the northern side of Richmond Road, adjacent to Nos 383-391. The area is characterised by various street furniture including signs, street lamps, traffic lights and a bus shelter. Mature street trees are also adjacent to the proposal.

The site is also located in proximity to Old Ryde House, which is a Listed Building and is on the approach to Richmond Bridge which is Grade 1 Listed.

The Richmond Road, East Twickenham Conservation Area Statement states:
Richmond Road (East Twickenham) conservation area forms the busy well-planned commercial centre of East Twickenham. It forms the historic approach to Richmond from the west towards Richmond

Bridge, and the gateway to Twickenham from the east. There is an important vista along this road towards the bridge, river and Richmond, and then back towards Poplar Court... Architecturally the area is characterised by consistent purpose-built Edwardian shopping parades along the south and part of the north sides of this road, providing a sense of urbanity and cohesiveness to the area. These parades are of 2.5 storeys in red brick with painted stone lintels and characteristic dormer windows, and retain a good number of original features such as fine traditional shopfronts.

Problems and pressures associated with the Conservation Area are listed as:

- *Loss of traditional architectural features and materials due to unsympathetic alterations*
- *Lack of coordination and poor quality of street furniture and flooring*
- *Domination of traffic and poor pedestrian safety leading to clutter of signage and street furniture*
- *Loss of original or quality shopfronts and unsympathetic alterations and advertisement*

As described above the area is mostly characterised by 2.5 storey Edwardian shopping parades, albeit there has been larger 3 storey development constructed adjacent to the site. It is noted there is various street furniture in the immediate locality, including a bus shelter, lamp post and signage. The site is also adjacent to mature street trees.

The NPPF is clear that where new telecommunication sites are required, equipment should be sympathetically designed and camouflaged where appropriate. The applicant states in their supporting information that *"Proposed location of a new mast shown above will assimilate well into the immediate street scene and not be detrimental"*. The LPA disagree considered given the Monopole is 20m in height and in accordance with the submitted elevation, would tower 10m above the nearest lamppost and trees, and 8m above the building directly adjacent. In reflection of the local character, it is not considered that the proposal can be compared to other street furniture, and therefore the scale of the monopole to *assimilate well into the immediate street scene* is not considered to be adequate justification for the proposal which is just under double the height of the largest building in the locality.

Given the uncharacteristic size and height of the proposed monopole, it is not considered that any of the development in the locality or street paraphernalia provides any justification or mitigation for such an incongruous and large proposal. Further, the proposal is sited in a sensitive location, within a Conservation Area, within the setting of Listed Old Ryde House and on the Approach to Grade 1 Listed Richmond Bridge. It is noted that this portion of the pavement consists of several items of street furniture, including a bus shelter, sign and refuse bin. The additions would result in added clutter to the locality, which as per the Conservation Area Statement is of current concern. This is particularly relevant given the siting of the proposals within the setting of the Listed Old Ryde House. It is considered that the additional street clutter adjacent to this building, coupled with the incongruous scale of the proposals will impact the setting of Old Ryde House, ultimately detracting from its special designation. The Monopole would tower above existing street furniture and would be visible in the lead up to Richmond Bridge, which, as described in the Conservation Area Statement are important views which characterises the area, and of which is important for the setting of which contributes to the historic importance of Richmond Bridge. The siting chosen is considered particularly poor given the very sensitive location which is affected by various heritage assets in addition to other constraints in respect of trees and transport, discussed further below.

Further, the applicants supporting statement includes references which infer that the site is not located within a Conservation Area. It is also noted there is no mention of the nearby Listed Buildings or justification in regard to the impact that these proposals have on the designated Heritage Assets. The Supporting information includes statements such as:

It is our opinion that the proposed design presents a better 'fit' within the local community and immediate street scape, offering a reduced visual impact upon an area of adopted highway identified, as situated out with a conservation area or other such restrictive designation.

And

The equipment cabinets are located at the base of the new pole and (unless the site is located in Article 2 (3) land), such installations are deemed Permitted Development without Prior Approval and therefore do not form part of the proposal from a planning consideration perspective as set out in the undernoted planning analysis

Paragraphs as above would imply that the developer was unaware of the heritage designations of the site and suggests that the siting and design of the proposal has not been duly considered.

Given the height of the monopole and inappropriate siting, it is considered that the proposal would be a conspicuous and incongruous addition to the locality, and would result in harm to the character of the locality and would change the setting of both Listed Old Ryde House and Richmond Bridge, leading to less than substantial harm to the listed assets and the surrounding Richmond Road, East Twickenham Conservation Area. The scheme would conflict with Policy LP1, LP3 and LP33 of the London Borough of Richmond Upon Thames Local Plan Adopted July 2018.

NPPF para 202 states 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.

The harm will be weighted against the benefits of the scheme and this will be discussed further throughout the report.

The proposed cabinets assessed independently will not be prominent within the streetscene. However, in conjunction with the proposed monopole add clutter to the street, which as discussed above impacts the setting of Old Ryde House and is harmful to the Conservation Area.

(b) Amenity

Policy LP8 of the Local Plan (2018) requires that developments do not cause harm to neighbouring amenities in terms of daylight/sunlight, outlook, privacy, noise and disturbance. Policy LP10 of the Local Plan (2018) specifically sets out that local environmental impacts of all development proposals should not lead to detrimental effects on the health, safety and the amenity of existing and new users or occupiers of the development site, or the surrounding land.

Recent appeal decisions have stated that there is a balancing exercise to be undertaken between the significant benefits of having high quality communications infrastructure with good mobile connectivity and the availability of mobile broadband, against the harm to visual amenity. The sensitivity of the location must also be afforded appropriate weight.

The equipment and monopole will be visible from residential properties on the upper floor of Richmond Road. Whilst harm is identified to the character and appearance of the area which by definition will be noticeable to local residents and visual amenity would be compromised, it is not considered that the scheme is in close enough proximity to habitable room windows warrant a refusal on the grounds of harm to residential amenity in particular. Despite being conspicuously high, the monopole is 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 monopole is not wide enough that sunlight would be adversely impacted either.

Given such the scheme is considered to satisfy Local Plan Policy LP 8.

(c) Pedestrian/highway safety

Local Plan Policy LP44 states:

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 including for health benefits and providing access to services, facilities and employment. The Council will:

- *Ensure that new development is designed to maximise permeability within and to the immediate vicinity of the development site through the provision of safe and convenient walking and cycling routes.*
- *Ensure that new development does not have a severe impact on the operation, safety or accessibility to the local or strategic highway networks.*

The proposed cabinets lie approximately 10m east of the bell-mouth access junction which serves as the vehicular access to and egress from 383-391 Richmond Road, which provides a basement car park, a servicing area and a supermarket on the ground floor, and a state primary school on the floors above.

It is noted that the application has not addressed potential vehicular and pedestrian safety issues in any of the submission documents. As such, the applicant has not demonstrated that a vehicular visibility splay of 2.4m x 2.5m can be provided in an easterly direction from the access junction. Failure to provide this visibility splay, which is set out in Chapter 7 of *Manual for Streets* (Department for Transport, 2007), will increase the likelihood of collisions between vehicles egressing the site and westbound vehicular traffic on Richmond Road.

Neither has the applicant evidenced that there is sufficient space on the pavement to accommodate the equipment in this particularly busy pedestrian environment adjacent to a School entrance. The equipment is sited somewhat back from the edge of the pavement in the wider school forecourt area, subdividing the pavement area. Pedestrians will suffer a net loss of usable footway. It is however observed that there would still be 3m of usable footway width north of the proposed structures and 2.5m of usable footway width south. Although the impact would be negative, it would be unlikely to create pedestrians' capacity issues significant enough to impact on pedestrian safety for those waiting at the bus stop or for those walking along the footway.

There is no discussion in the supplementary information to indicate how congested the pavement is at school pickup/drop off times. Third party representations received reinforce that the pavement in this location is congested. In particular, the representation from Deer Park School states:

"This area is heavily used at both entry and exit times within the school day, and is congested at these times; especially in light of the adjacent bus stop. The congestion traffic in this case is primary aged children and their families, many of whom have prams, bikes, scooters, or buggies, and the imposition of a 20m mast and three large metal containers will be at best obstructive and, more likely, unsafe for our children. The current space outside is already tight with 329 children currently attending our school. This will be 420 children by 2025, and the space outside our front entrance will thus be increasingly important – and increasingly busy – over the next three years. This, of course, is to say nothing of the added congestion from regular foot traffic on the pavement, and that the proximity to Lidl makes this a thoroughfare for local shoppers."

Given the very sensitive siting, the onus should be on the applicant to demonstrate that this would not be materially harmful and this adds to concerns about visibility splays and highway/pedestrian safety in general.

Given the lack of justification provided the council it is not considered that highway safety issues have been adequately considered or mitigated and the proposal is therefore not in accordance with Para. 110 and 112 of the NPPF nor Local Plan Policy LP44.

(d) Flooding

Local Plan Policy LP21 states that All developments should avoid, or minimise, contributing to all sources of flooding, including fluvial, tidal, surface water, groundwater and flooding from sewers, taking account of climate change and without increasing flood risk elsewhere.

The site is located within Flood Zone 2, 3 and 3a and is designated in a critical drainage area. 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 2 or 3.

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”.

(e) Trees

Policies LP15 and LP16 seek to protect biodiversity and health and longevity of trees, woodland and landscape in the borough. Local Plan policy LP16, subsection 5 requires “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 (2012).”

The location of this proposal is sited within the “CA66 Richmond Road East Twickenham” Conservation Area, which affords trees both within and adjacent to the site of the proposal, statutory protection. Furthermore, records show there are 2xTurkey Oaks adjacent to the site of the proposed telecom mast which are subject to statutory protection via Tree Preservation Order (TPO) Ref: T0378 affording them singular protected status.

The scheme is located on the footpath on the northern side of Richmond Road, Opposite No. 383-391. 1 x highway tree (Liquidamber) is identified adjacent to the location of the proposed telecom apparatus that is managed and maintained by the London Borough of Richmond upon Thames (LBRuT). The Council is concerned with this tree in particular given that its proximity is such that there may be interference with the RPA of this tree.

The submitted documentation is insufficient for the purposes of assessing the impact of construction activities on the trees on site and does not provide any corresponding tree survey data that can be independently verified by the LPA as part of the application process.

No documentation has been submitted relating to tree protection measures and the impact of indirect construction activity by the way of storage of materials, the use and storage of plant and machinery (Where necessary) or ingress and egress to the site etc.

There is not sufficient detail pertaining to the excavation required for the installation of underground service runs to supply the mast nor details on the depth of the excavation for the concrete foundation and their impact on nearby trees nor is there a method statement or construction plan.

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. There is no documentation submitted to assess how trees (Including any remote from site) will impact upon telecommunications attached to the mast, both present and future that require LOS to function.

An Arboricultural Impact Assessment is crucial to understand the immediate and long term impacts upon trees. Given the lack of information submitted as outlined above, it is not possible for the Council’s Tree Officer’s to make a full and considered assessment of the proposal. Therefore, by reason of insufficient information, the applicant has failed to demonstrate that the scheme would not be detrimental to the mature trees located adjacent to the proposed monopole, and not cause consequent harm to the character and appearance of the locality and Conservation Area, of which these street trees contribute, and is therefore contrary to Local Plan Policy LP1, LP3, LP15 and LP16.

(f) Compliance with the NPPF

Section 10 of the NPPF deals with supporting high quality communications infrastructure. Paragraph 115 states: “The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion”.

Para 117 states: "Applications for electronic communications development (including applications for prior approval under the General Permitted Development Order) 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 and a statement that self-certifies that, when operational, International Commission guidelines will be met.*

That applicant notes that Riverside Nursery Schools, Twickenham Park, Deer Park School and Rosslyn Nursery & Preschool are sited in proximity to the application site. Notably the entrance to Deer Park School is adjacent to the proposed mast. The supporting information states that each school was consulted. There has been no additional evidence submitted to substantiate this from the applicant, although it is noted that an email was sent to the Planning department and other third parties, including the above mentioned schools on 7/12/22 which asked for comment. The Planning department did not respond; however it is noted that Deer Park School responded on 14/12/22 outlining a number of concerns. In the supporting information submitted with the application under 'Summary of outcome/Main issues raised:' the applicant states 'N/A' which would indicate that the schools did not comment on the scheme. As above, this of course is not the case, and the applicants lack of transparency in this instance is considered to be contrary to the requirements of Para 117a of the NPPF which states that applications should be supported with outcomes from consultations with organisations with an interest in the proposed development.

The NPPF indicates that a Local Planning Authority should not seek to set additional health standards. The NPPF states that Local Planning Authority must determine applications on planning grounds. They should not seek to prevent competition between different operators, question the need for the telecommunications system, or determine health safeguards if the proposal meets International Commission guidelines. This position is established in planning law. In this instance the applicant has stated in their supporting information that provided the ICNIRP (International Commission for Non-Ionising Radiation) declaration for public exposure has been submitted, although this information appears to be missing. In the absence of such information an objection on public health grounds tenable. The proposal is thereby considered contrary Para 117b of the NPPF as well as to policy LP33 of the Local Plan (2018) and SPD 'Telecommunications Equipment' (2008).

The applicant has provided an image of the cell search area, noting that the mast must be located 'close to the area shown'. In regards to discounting options, the applicant has provided a paragraph which outlines the sequential approach and states: '*all attempts to utilise any existing telecommunication structures where they represent the optimum environmental solution have been employed.*'

There is no discourse regarding the alternative sites which were considered and therefore the Council do not agree that the proposed site has been well considered, nor that other sites in the cell search area or 'close to' have been appropriately discounted. Notably, there are several flat roofed buildings in the immediate locality for which it would appear that no consideration has been given. This includes the roof of Ryde House and several buildings along Cambridge Road and Clevedon Road.

The Council notes appeal decision APP/H5960/W/22/3299292 where the planning Inspectorate acknowledges the lack of information submitted to justify that the appeal site was the most appropriate for the telecommunications structure:

I acknowledge that the technical and operational requirements of the 5G service means that the target service area can be small. I also accept, again for technical and operational reasons, that the potential to erect antennas on existing buildings, masts or other structures can be limited and subject to constraints. However, very little evidence has been submitted in regard to why, in this case, this is not a suitable alternative. Although the submitted evidence depicts the locations of some existing

telecommunications equipment in the area, an existing mast closer to the appeal site and beside the A3 to the northeast is not referenced. No Detailed reference is made to existing buildings in the area which do include some non-residential buildings of quite considerable height. Such Options have been discarded in favour of new ground-based options without evidence of clear or robust reasoning.

The appeal was ultimately dismissed and it is considered that the Inspectorates decision puts further emphasis on the need for applications to be submitted with robust and compelling justification. Given the above it is not considered that the proposal has adequately considered alternate sites and the proposals are therefore contrary to Paragraph 117c of the NPPF.

(g) Compliance with the Development Plan

Policy LP 33 deals with telecommunications and states that applications, including for prior approval 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.

The policy explains that it is important to keep the number of masts and sites to a minimum as an over-concentration of equipment and installations can have harmful impacts on the borough's unique and distinctive character. Therefore, there is an expectation that existing masts, buildings and other structures are used wherever possible, which includes sharing facilities with other operators, unless the need for a new site has been justified and accepted by the Council.

As discussed in section (f) above, this has not been fully considered by the applicant.

2. Visual impacts of telecommunications proposals should be minimised, in line with policies on Local Character and Design, particularly on roof tops.

As discussed in section (a) above, this has not been fully considered by the applicant.

3. The applicant has demonstrated that the development will operate within the International Commission on Non-Ionizing Radiation Protection Guidelines for public exposure.

As discussed in section (f) above, this has not been provided by the applicant.

(h) Planning balance

Para 114 of the NPPF advises 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.'

Local Plan policy LP33 states that 'The Council will promote the enhanced connectivity of the borough through supporting infrastructure for high speed broadband and telecommunications'.

It is acknowledged that the proposal would bring public benefits in enhancing the telecommunications infrastructure and enhancing the network provision. The applicant has not provided certification that the installation would comply with ICNIRP. Weight that would be afforded to the benefits of the application is discounted given the lack of ICNIRP certification.

The introduction of the proposed telecommunications equipment, by reason of its size and siting, would result in an incongruous form of development which would have a detrimental impact on the character and appearance of the locality, the Richmond Road. East Twickenham Conservation Area and nearby Listed Old Ryde House and Richmond Bridge. Further, the scheme fails to demonstrate that adjacent trees will be adequately safeguarded or that flooding risks have been adequately considered, and this weighs against the proposal.

Whilst the benefits of providing improved infrastructure for the telecommunications network have been

taken into account and acknowledged, they are not considered to outweigh the visual harm that this proposal would cause to the local area, designated heritage assets and the potential impact on mature trees, highway/pedestrian safety and flood risk.

The National Planning Policy Framework (the Framework) recognises that high quality and reliable communications infrastructure is essential for economic growth and social well-being. However, while planning decisions should support the expansion of communications networks, paragraph 115 of the Framework advises that the number of masts and the sites for such installations should be kept to a minimum. The LPA is not satisfied from the information provided that no alternative sites would be available to provide the required coverage. This is a material consideration which affects the planning balance.

As such, the proposal is contrary to policies and guidance from the Local Plan (2018) in particular LP1, LP3, LP15, LP16, LP21, LP33 and LP44 and Supplementary Planning Document 'Telecommunications Equipment' (2006).

8. RECOMMENDATION

Prior approval of the Council is REQUIRED AND REFUSED for the development

Recommendation:

The determination of this application falls within the scope of Officer delegated powers - YES

I therefore recommend the following:

- 1. REFUSE
- 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):DAV..... Dated:27/01/2023.....

I agree the recommendation:

This application has been subject to representations. The Head of Development Management / South Area Team Manager has considered those representations and concluded that the application can be determined without reference to the Planning Committee in conjunction with existing delegated authority.

South Area Team Manager:Nicki Dale.....

Dated:31.01.2023.....