



Planning Department
London Borough of Hounslow
Hounslow House
7 Bath Road
Hounslow
Middlesex TW3 3EB
Attn: Mr Jack Meacher

Grove Park Group
c/o 26 Grove Park Road
London W4 3SD

admin@groveparkgroup.com

8 March 2022

Dear Mr Meacher,

Re: Telecommunications masts application at 24-26 Beechwood Court, Park Road, London W4 3HJ (System Reference P/2022/0371, Planning Reference 01255/24-26/COM1)

We are writing in relation to the above application. The Grove Park Group is the local residents' association for the area, which has been in existence for over 50 years, and whose membership represents c260 households. Our approach is to comment only on planning applications which have a potential impact on the wider Grove Park area. We support the development of communications infrastructure which is appropriately cited and benefits the wider community and residents, and herein comment on the application and constructively set out a proposed 5g telecommunications plan for Grove Park.

We note that the applicant is seeking permissions to erect 6x antennae each 3.5 metres high (the "Masts"), on top of Beechwood Court which is one of the taller buildings within Grove Park. We propose the application is refused, taking into consideration the following:

1. The application appears to be missing information we would typically expect, for instance results from the applicant's consultation amongst residents and the building's tenants / freeholders, the suitability of the building for the development (location / height, adjacent building or environmental factors influencing the Masts), health & safety considerations (for instance there has been no submission of a 5G health statement or ICNIRP Form) and alternative sites considered (whether there were more appropriate buildings eg on the periphery of the conservation area).
2. The property currently has no developments on its roof beyond a small service building at a height of approximately 2.5m (ie proposed development at 3.5m height is 1m higher than this). The application cites there is existing equipment on the roof which appears incorrect and may be misleading to others considering their position on the application.
3. The proposed development would impact the visual amenity on the area. The 6x 3.5m high Masts are incongruous against other properties and the nature of the area, being significantly higher than other properties and visible from the street and adjacent properties along Park Road, neighbouring roads within Grove Park and (as we understand from residents) certain areas of Chiswick House & Gardens. The proposed development is out of scale and overly prominent, with trees providing only limited coverage and only through part of the year. We note that the property's visual appearance and architectural merit has limited influence on our view here.
4. The proposed development should be considered in terms of its siting and appearance and, whilst acknowledging it is permitted development under the GPDO, local policies and frameworks should be referred to as will help in determining impact on visual amenity generally (ie appearance and



character of the area). This has happened through previous applications assessed by the Planning Department. The local policies and frameworks we identify are as follows:

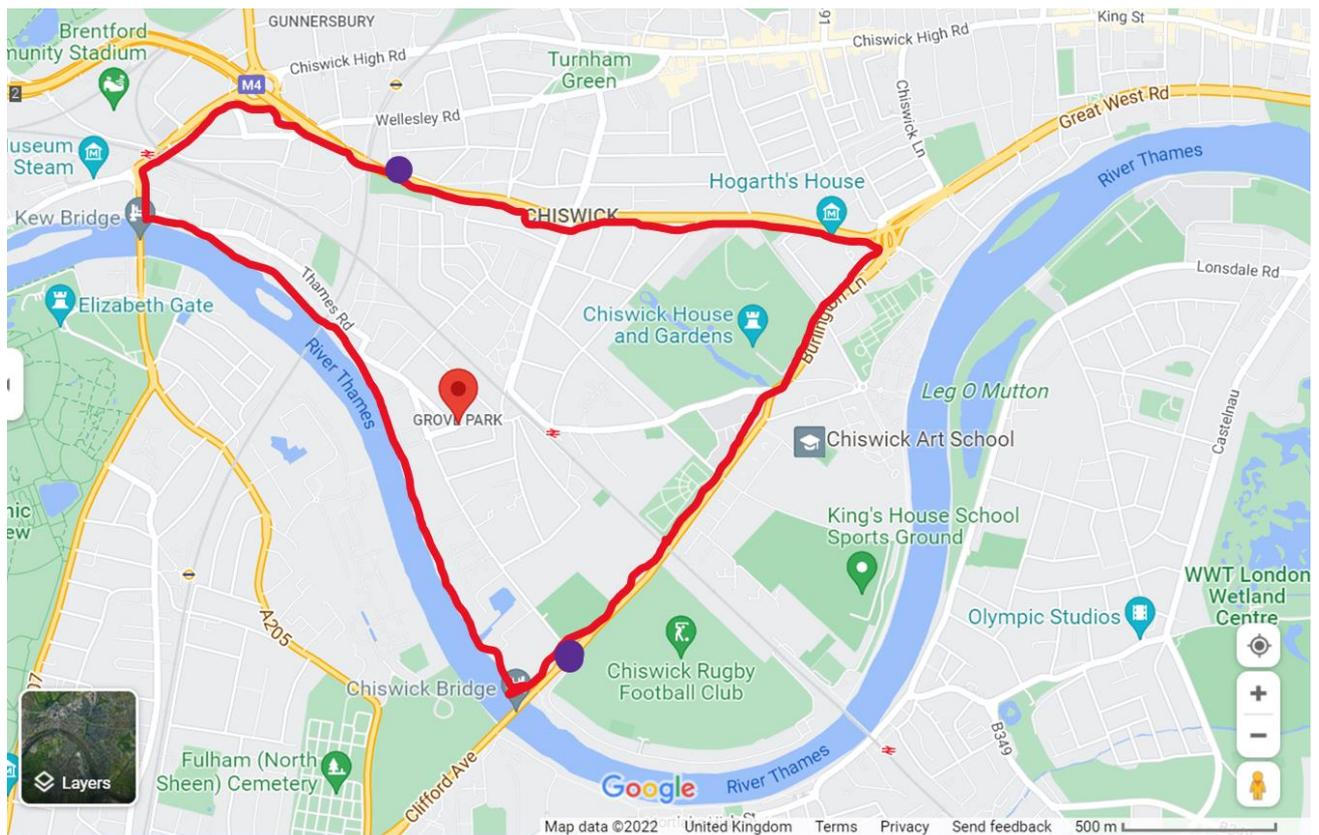
- a. the Chiswick House Conservation Area (as updated in January 2021 by London Borough of Hounslow),
 - b. the NPPF,
 - c. Local Plan policies CC1, CC2 and CC4,
 - d. Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (the Act) paragraph 199.
5. There is insufficient evidence to justify the proposed development, with the location of the Masts potentially providing limited benefit for Grove Park residents, with the mast located near the A4 but potentially covering a limited area within Grove Park. It is our expectation that residents will in general see benefit from increased 5g communications coverage, so we appreciate there is a balance to be struck. It is likely that several 5g masts will be required to cover Grove Park, noting that each mast relates to only one or two mobile networks and may cover a limited area. Please see below our proposal for Grove Park, which we will refer to through future telecommunications mast applications and in our communications with local residents and other stakeholder groups.
6. There are several prior applications which have considered similar developments where we would like to highlight the decisions reached and our view of relevance to this application:
- a. Opposite 58 Corney Road, Chiswick W4 2RA for 20m monopole 5g mast (planning reference PA/2021/4816): Refusal on 28/1/2022 stated the application does *“not comply with Condition A.3(4)(a) of Schedule 2 Part 16 of the General Permitted Development Order as it requires prior approval and would, because of its siting and appearance, be an intrusive development which would create harmful and overbearing impact on the occupiers of nearby residential properties.”* We see similar impact here on local residential properties.
 - b. Land to the north of Harvard Hill for 15m monopole 5g mast (planning reference 00505/GX/PA1): Approval on 5/8/2021. This is not relevant, being a mast appropriately located along the busy A4 road, adjacent to existing road infrastructure, with limited impact on visual amenity.
 - c. Land at Staveley Road opposite 41 Burlington Lane, Chiswick W4 3ET for 15m monopole 5g mast (planning reference 00176/L/COM2): Prior refusal of previous application (planning reference 00306/OPP58/COM1) on 28/1/2021. Refusal on 14/5/2021 stated the application *“would, because of its siting and appearance, be an intrusive and unduly prominent development which would create harmful overbearing impact on the occupiers of nearby residential properties. The proposal would also be out of scale and character with, and harmful to, the Chiswick House Conservation Area”* and *“be detrimental to the visual amenity of the locality and the appearance and character of the site, contrary to the NPPF and Local Plan policies CC1, CC2 and CC4”*. Dismissal at appeal 2/2/2022 stated that whilst the local development plan policies were not specifically relevant to the GDPO, the decision *“had regard to these policies and related supplementary guidance only in so far as they are a material consideration relevant to matters of siting and appearance”* and supported the findings of the original refusal. We see similar impact here on local residential properties and the visual amenity of the local area.



- d. Sutton Court, Sutton Court Road, Chiswick W4 3EE for 6x 5g masts (planning reference 01091/E/COM1): Refusal on 29/1/2020 stated that “six antenna systems are proposed which is more than five allowed under the legislation” and was refused “because of its siting and appearance would be an intrusive development, out of scale and character with the building on which it is located, and would thereby be detrimental to the visual amenity of the locality and the appearance and character of the site, wider Sutton Court Estate and nearby Chiswick House Conservation Area, as well as being harmful to the outlook from residential properties”. We see similar impact here on local residential properties and the visual amenity of the local area.

We would like to propose a 5g telecommunications plan for Grove Park (Chiswick Homefields and Riverside wards), and which could also apply to Strand on the Green.

- Grove Park is an area which is bounded by the A4 to the North, the A316 to the East, the A205 to the West (encompassing Strand on the Green) and the River Thames to the South.
- It is our understanding that 5g masts in some situations will reach a mere 500 metres. There is no area within this boundary which is materially more than 500 metres away from the three surrounding arterial roads.



- We propose that any 5g masts are erected along the three surrounding arterial roads, which should, subject to technical assessment, provide sufficient coverage for both road users along these main roads and the local communities Grove Park and Strand on the Green.

It would be of benefit for the LBH's Planning Department and applicants to be aware of our approach and proposal for Grove Park, so we will publicise this on our website and repeat this in commenting



on future applications. We are perfectly happy should you wish to engage with GPG (contact email address above), to make this letter public or to share this plan or letter with applicants.

Kind regards

Rob King

Rob King

Chair, The Grove Park Group