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Clerk: Ruth Davies

Michael Lee Planning Officer RBWM

7 October 2021

Dear Michael

Reference: Planning Application 21/02541 Installation of a 30m Greenfield column with associated supporting apparatus and post rail fence enclosure. Telecommunications Mast, Tittenhurst, London Road Sunninghill Ascot

The Planning Committee considered this application at its meeting on 5 October 2021 and **objects** to this application.

This application concerns the installation of a 30m telecommunications greenfield column with associated supporting apparatus in the green belt.



The site is located within a small triangle shaped grass area which accommodates an existing O2/CTIL telecoms mast. The area where the proposed site is to be situated is currently amenity land with no alternative use. This is shown in the picture to your left.



The site already has an existing 15m mast and the proposed 30m mast is planned to be colocated 16.62m away. This is shown in the site layout to your left.

This proposal therefore represents new development in the green belt.

The applicant claims that "The presence of this existing telecoms mast provides a utilitarian context in which the proposed greenfield column will assimilate, thereby not resulting in a prominent, or incongruous feature which would detract from the existing character of the area."

This is very far from the truth. The sheer height of this column at 30m completely overwhelms both the existing 15m mast and the tree canopy which has a height of 19m. This is best illustrated by the picture below.



The National Planning Policy Framework (NPPF) covers both the key aspects of this application; that of Communications Infrastructure and Protection of the Green Belt.

Communications Infrastructure

The NPPF states in paragraph 114 that 'advanced, high-quality communications infrastructure is essential for sustainable economic growth', with paragraph 115 stating that 'existing masts, buildings and other structures should be encouraged'. Where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate'.

Paragraph 118 requires that 'local planning authorities 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 for public exposure'.

Protecting the Green Belt

However, paragraph 148 requires that "when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations."

Paragraph 149 requires that " a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt." This paragraph refers to 'buildings' as defined in section 336 of the Town and Country Planning Act 1990 (as amended) to mean any structure or erection. This mast is therefore a 'building'.

The applicant argues that this is an 'engineering operation' as a result of engineering input with regards to the foundations, wind load and structural capacity of the structure. As engineering operations, electronic communication works benefit from the guidance contained in paragraph 150 of the Framework and should only be treated as inappropriate development where they affect the openness of the Green Belt.

A 30m high telecommunications mast does not fall within any of the exceptions listed in paragraph 149 of the NPPF and no very special circumstances have been put forward that outweigh the harm to the Green Belt.

The proposed tower would be adjacent to trees but as mentioned above this tree canopy height is only 19m. The mast at 30m in height would be excessive in height and would be clearly visible, towering above the canopies of the trees within the vicinity by a considerable distance. The height of the proposed tower with its open lattice design would be very prominent in the landscape and the adjacent open green space.

Consequently, the proposal would lead to a loss of spatial and visual openness. As such it would fail to safeguard the countryside from encroachment, one of the five purposes of the Green Belt, and would not comply with the fundamental aim of Green Belt policy to prevent urban sprawl by keeping land permanently open.

The scale and design of the proposed tower is unacceptable in this location. The proposal is therefore considered to not be in accordance with the broad aims of the National Planning Policy Framework.

Also, the visually prominent and utilitarian appearance of the lattice tower would detract from the rural context of the site and its immediate surroundings of open fields, trees and hedges. It would represent a stark and incongruous intrusion of built development of a height and scale which would be noticeably greater than those of the closest trees. We would argue that the visual impact is not sufficiently minimised by the light permeable lattice design, since the structure would nonetheless be bulky in appearance, and this would be compounded by the antennae and dishes at the top. Using a zinc galvanised or other colour finish would do little to ameliorate this prominent and utilitarian appearance.

Conclusion

The proposed telecommunication mast represents inappropriate development in the Green Belt which is harmful by definition. No very special circumstances have been identified to outweigh this harm. The proposed development fails to comply with Chapter 13 of the NPPF 2021.

The height of the proposed tower with its open lattice design would be very prominent in the landscape. The scale and design of the proposed tower are considered to be unacceptable in this location. The proposed tower would have a materially adverse impact and a visually prominent impact on the surrounding area contrary to Chapter 13 of the National Planning Policy Framework 2021.

The Parish Council request that this application is **REFUSED**.

Yours sincerely

Yvonne Jacklin and Michael Burn Co-Chairs of the Planning Committee