

DELEGATED APPLICATION REPORT

Ward: Norcot

App Ref: 230425/TEL

Address: Land to the East of, 173 The Meadway, Tilehurst, Reading, RG30 4AP

Proposals: Proposed 5G telecoms installation: H3G 15m street pole and additional equipment cabinets.

Case Officer: Beatrice Malama

Applicant: CK Hutchison Networks (UK) Limited)

Date received (valid from): 1 April 2023 **Target Decision date:** 27 May 2023

Date Visited:

1. SITE DESCRIPTION

The application site is the Council owned green space located on the Meadway opposite the junction with Dee Road to the north east and opposite an arcade of shops to the south west. The site contains multiple trees and this space is designated within the Council's Tree Strategy as a 'treed corridor'. The wider area is largely residential comprising a mixture of single, two and three storey properties built around the 1960s. The site falls within an Air Quality Management Area.

2. PROPOSAL AND SUPPORTING INFORMATION

Planning Application ref. 221915 /TEL for prior notification of proposed 5G telecoms installation: H3G 20m street pole and additional equipment cabinets by telecommunications code systems operators was refused on 10 February 2023

The current resubmission (ref. 230425/TEL) seeks prior notification for the proposed 5G telecoms installation: H3G 15m street pole and additional equipment cabinets by telecommunications code systems operators.

Plans considered:

- RDG20574_RDG211_89986_RG6856_GA_REV_B_Issue B – 002 Site Location Plan dated 28 March 2023, received 1 April 2023
- RDG20574_RDG211_89986_RG6856_GA_REV_B_Issue B – 215 Proposed Site Plan dated 28 March 2023, received 1 April 2023
- RDG20574_RDG211_89986_RG6856_GA_REV_B_Issue B – 265 Proposed Site Elevation dated 28 March 2023, received 1 April 2023
- RDG20574_RDG211_89986_RG6856_GA_REV_B_Issue B – 001 Drawing Register dated 28 March 2023, received 1 April 2023
- Government statement dated 7 March 2019, received 1 April 2023
- The Declaration of ICNIRP Compliance dated 28 March 2023, received 1 April 2023
- Developer's Notice to Planning services and Highways Services ref: RDG20574 - THE MEADWAY, dated 1 April 2023, received 1 April 2023
- 5G Site Specific Supplementary Information and Planning Justification ref: RDG20574 dated 1 April 2023, received 1 April 2023.
- 5G Health and Network Briefing received 1 April 2023

- Tree Protection Method Statement & Specification Ref: SA/2111/23, dated 9 March 2023, received 1 April 2023
- Tree Protection Plan Ref: TM/TPP/2111-02 dated 9 March 2023, received 1 April 2023
- Tree Survey Plan Ref: TM/TSP/2111-01 dated 9 March 2023, received 1 April 2023
- Application Form dated 1 April 2023, received 1 April 2023

3. RELEVANT PLANNING HISTORY

Planning Application ref. 221915 /TEL for prior notification of proposed 5G telecoms installation: H3G 20m street pole and additional equipment cabinets was refused on 10 February 2023

4. CONSULTATIONS

Internal Consultation

RBC Transport Development Control comment received as follows:

"The proposed location of the additional equipment cabinets and pole will not impact on any visibility splays at the adjacent junction or obstruct pedestrian movement given that equipment will be located within the grassed verge area. A crane license must be obtained for work carried out on the highway in order to erect the street pole.

In view of this, there are no transport grounds to object to this proposal subject to the suggested informatives."

RBC Natural Environment commented as follows:

"I have no objections subject to development being in accordance with Tree Protection Method Statement & Specification Ref: SA/2111/23 dated 09 March 2023 from Syllanarb and associated Tree Protection Plan TM/TPP/2111-02"

Local Ward Councillors – No comments received

Public Consultation

A site notice was displayed on site and owners/occupiers of nearby properties were consulted by letter.

No letters of representation received.

Equality Act 2010:

In determining this application the Council is required to have regard to its obligations under the Equality Act 2010. However, there is no indication or evidence (including from consultation on the application) that the protected groups identified by the Act have or will have different needs, experiences, issues and priorities in relation to this particular planning application. Therefore in terms of the key equalities protected characteristics it is considered there would be no significant adverse impacts as a result of the development.

5. LEGAL AND PLANNING POLICY CONTEXT

The application has been assessed against the following policies:

National

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy framework (NPPF) - among them the 'presumption in favour of sustainable development'.

Reading Borough Local Plan (November 2019)

- CC7: Design and the Public Realm
- CC8: Safeguarding Amenity
- EN8: Undesignated Open Space
- EN14: Trees, Hedges and Woodlands
- OU3: Telecommunications Development
- TR3: Access, Traffic and Highway-Related Matters

Appraisal

This application has been submitted under the Prior Approval procedure under Part 16, Class A.3 (3) of The Town and Country Planning (General Permitted Development) Order 2015 (as amended) and the Local Planning Authority (LPA) has 56 days in which to decide whether prior approval is required or not. If prior approval is required, such approval can either be given or refused by the LPA. This is not a full planning application and the limitations of the Regulations mean that the LPA is unable to impose any additional conditions.

Principle of development

Part 16 Class A (as amended by the 2016 GPDO) only allows LPAs to determine whether the prior approval of the authority will be required as to the siting and appearance of the development.

Siting and Appearance

In accordance with Reading Borough Local Plan Policy OU3: Telecommunications Development, proposals for telecommunications development will be permitted provided that:

- They do not have an adverse impact on the visual amenity of the surrounding area or on the significance of a heritage asset;
- The apparatus will be sited and designed so as to minimise its visual impact by the use of innovative design solutions such as lamp column 'swap-outs' or concealment/camouflage options; and
- Alternative sites and site-sharing options have been fully investigated and it has been demonstrated that no preferable alternative sites are potentially available which would result in a development that would be less visually intrusive.

In the first instance, the proposed monopole and associated cabinets will be appraised for their impact on the character and appearance of the surrounding area. The proposal will then be assessed to determine if alternative sites (where possible) have been fully investigated within

the supporting documentation for this application. The proposed monopole will be assessed from three viewing angles based on the flow of vehicle traffic within the surrounding area.



Fig 1. Aerial image showing the proposed location of the mast and viewing angles to be assessed

Icon	Icon Name	Description
	Proposed Antenna	The proposed location for the monopole and associated cabinets.
	Viewing Angle 1	The view to be appraised north-west of the proposal site on The Meadway
	Viewing Angle 2	The view to be appraised south-east of the proposal site on The Meadway.
	Viewing Angle 3	The view to be appraised on Dee Road opposite the site

The application site is the Council owned green space located on the Meadway opposite the junction with Dee Road to the north east and opposite an arcade of shops to the south west. The site contains multiple trees and this space is designated within the Council's Tree Strategy as a 'treed corridor'. The wider area is largely residential comprising a mixture of single, two and three storey properties built around the 1960s. There are a number of vertical elements of street furniture of various heights which are within the site's immediate surrounding area both on The Meadway and Dee Road. Due to its location, the site is very visible from all the viewing angles particularly when viewed from Dee Road.

The National Planning Policy Framework (NPPF) (Feb 2021) states that; "Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate".

Although there are several street poles within the site's immediate surrounding area, none of the nearby vertical elements of street furniture is as tall and as bulk as the proposed telecommunications equipment. Due to its design and size, the proposed mast and its associated cabinets would appear out of keeping with the immediate surrounding and the wider street. The proposed monopole is 15m tall and would be significantly taller than any existing street structures, nearby trees and buildings. Given the design, height and bulk of the proposed 15m high monopole

and its associated cabinets, it would appear as an overly prominent, obtrusive feature which would contrast unsympathetically with the existing open and undeveloped character of this part of The Meadway and open space around it. Further it would appear as an alien and uncharacteristic feature in the context of the green open space that surrounds the site. This would be exacerbated by its prominent siting opposite a junction, near the traffic lights and on a busy Road.

The applicant within the Site Specific Supplementary Information (SSSI) document states that *“In keeping with the National Planning Policy Framework (NPPF) guidelines of using: “high quality communications” (Section 10), the proposed design has been selected to minimise visual impact upon the streetscape by integrating with the existing built environment.”* Further the SSSI documents states that *“the proposed ‘Streetworks’ design has been selected to minimise visual impact upon the street scene by integrating with existing street furniture.”*

Whilst the statement appears to indicate that the proposed development has been designed so as to minimise the visual impact on the street scene, the Council does not agree with the above claim. Although there are a number of street furniture features near the site on The Meadway, Dee Road and the immediate surrounding area, none of the nearby street furniture features are as tall and as bulk as the proposed telecommunications equipment therefore it is untrue that the proposed equipment would easily integrate with existing street furniture. Given the height and bulk of the proposed 15m high monopole it would be significantly taller and bulkier than any nearby street pole which are much shorter, smaller and slender in design. At 15m high, the proposed monopole would tower above any nearby structures and trees and would be visible over a wider radius and thus would have an adverse impact on visual amenity of the street and the wider area. The harm would be exacerbated by its prominent location opposite a junction and on a busy road.

The proposed telecommunications equipment on this part of the street would cause a significant change in the character and appearance of the area and its surrounding in comparison with the existing context. The applicant does appear to acknowledge, within the SSSI document, that the proposed equipment would result in a localised increase however no attempt has been made to address any potential harm to visual amenity resulting from the proposed equipment. It is not clear if any attempts to make the proposed development less visually intrusive such as through the use of a more sympathetic design has been made.

Whilst it is acknowledged that attempts have been made by the applicant in trying to minimise the harmful impact of the equipment on the character of the area by reducing the height of the monopole from 20m to 15m and changing the design of the antennas, this is not considered adequate to overcome the LPA’s earlier reasons for refusing application ref: 221915 /TEL. Overall the proposed revisions do not address the fundamental concerns of height, bulk and prominence.

The LPA appreciates the importance of improved connectivity and the benefits that the proposed development would bring about in terms of technological advancements in communications, however, these benefits are not considered to outweigh the adverse visual impact the proposal would have on the character and appearance of the area.

In light of the above, it is considered that the proposed development would detract from the visual amenity and appearance of the surrounding area, contrary to Policies CC7 and OU3 of the Reading Borough Local Plan (2021). On this basis the proposal is recommended for refusal.

Natural Environment – Siting

Associated with the above findings, a further important consideration is that the proposed site lies on a public open space.

Policy EN8 (Undesignated Open Space) of the Reading Borough Local Plan 2019 states that: *“(.....)Development should not result in the loss of or jeopardise use and enjoyment of undesignated open space (...) The quality of existing open space should not be eroded by insensitive development on adjoining land.”*

Policy CC7 requires that *“All development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located”*.

Given the size, design and siting, the proposed 15m high monopole and its associated cabinets would appear as an overly prominent, obtrusive feature which would contrast unsympathetically with the existing local green space. The proposed development is not sensitive to the character of the local green space, thereby eroding its quality, and no attempts have been made to make the proposed development more in keeping with the character and appearance of the local green space. Given the design and bulk of the proposed telecommunications equipment, it would fail to maintain and enhance the character and appearance of the surrounding open space.

In view of this, the proposed development is considered to have harmful impact on an undesignated Open Space as such the proposal is considered to conflict with Policy CC7 and EN8 of the Reading Borough Local Plan 2019. This therefore forms the second reason for refusal.

Effect of Siting on Residential Amenity

Given the nature of the proposed development and its location away from any residential properties, there is not considered to be harm to the living conditions of the residents with respect to overbearing effects of the development or any other criteria listed under policy CC8 of the Reading Borough Local Plan (2019).

Alternative Sites

In accordance with the sequential approach outlined in the National Planning Policy Framework (NPPF) consideration should always be given to sharing any existing telecommunication structures in the area, secondly consideration is then given to utilising any suitable existing structures or buildings and thirdly sites for freestanding ground-based installations are investigated.

The application proposes to install an H3G 15m high street pole within the grass verge located on the Meadway opposite Dee Road and in front of an arcade of shops. Information contained within the Site Specific Supplementary Information document indicates that four other options within the identified cell search area were discounted. The main reasons for discounting these options were the very residential nature of the area and insufficient pavements. Whilst a list of discounted options and the reasons for discounting has been provided, it lacks detailed evidence to show that alternative options were thoroughly investigated and discounted.

The application has not provided compelling evidence to show that there is no other option within the area which would be less visually intrusive. For example it is unclear whether other options such as rooftops or site sharing were considered. Due to insufficient information provided to support the choice of the site and the reasons for discounting alternative sites, it is difficult to

assess whether this is the best available option within the area. Whilst alternative options may be limited (this has not been demonstrated), it remains necessary that compelling evidence is provided to show that a thorough search was conducted and no technically viable option was found.

In view of this, it is considered that the assessment of possible alternatives with reduced visual impact have not properly and robustly been reviewed and discounted by the applicant in line with guidance contained within the NPPF and this adds to the reasons for refusal.

Health Issues

The NPPF states 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”. The supporting text to Policy OU3 states that “ICNIRP declarations should be based on the cumulative effects of electromagnetic fields emitted by other nearby base stations and antennae as well as the proposed development”.

The applicant has provided an ICNIRP certificate to support this planning application. This certifies that the proposed development would be in full compliance with the requirements of the radio frequency (RF) public exposure guidelines of ICNIRP. Therefore, the ICNIRP certificate complies with current Radio Frequency exposure guidelines, as defined in the EU Council recommendation of 12 July 1999 on the limitation of exposure of the general public to electromagnetic fields (0 Hz to 300 GHz).

The ICNIRP guidelines continue both to exclude known health risks and to minimise unascertained health effects. The ICNIRP guidelines are the most up-to-date and relevant tool to ascertain the acceptability of telecommunications development within the planning process. Bearing in mind the Government's view on mobile phone masts and health issues, as expressed in the NPPF, it would not be appropriate for this Council to substitute its own "opinion" on health issues for that expressed by ICNIRP.

On balance, the suggested health risks associated with this development and the fear and/or stress associated with these perceived risks are outweighed by the reassurances provided by the technical information submitted by the applicant. As such, the possible health implications of such apparatus are not considered sufficient reason to refuse prior approval.

Conclusion

Whilst the proposed development benefits from permitted development under Article 3 in Schedule 2, Part 16, Class A of the Town and Country Planning (General Permitted Development) Order 2015, the prior approval of the local planning authority required in terms of the siting and appearance of the development. The proposal has been assessed in terms of siting and appearance and has been found to conflict with Local and National Policy guidance as such the development is recommended to be REFUSED.

Recommendation

PRIOR APPROVAL REFUSED

Reasons for Refusal:

1. The proposed H3G 15m high street pole and its associated cabinets, by reason of its design, height, bulk and siting at a prominent location, would detract from the visual amenity and appearance of the immediate and wider surrounding area, including the green open space within which it is located, contrary to Policies CC7, EN8 and OU3 of the Reading Borough Local Plan (2019).
2. The proposed telecommunications mast and its associated cabinets by reason of its scale, design and siting on an undesignated open space, would disrupt and result in visual harm to the area of open space, erode its quality and would adversely impact on public enjoyment of the public open space, contrary to Policies EN8 and CC7 of the Reading Borough Local Plan (2019).
3. The proposal, in the absence of sufficient detail on potential alternative sites for the development, has failed to demonstrate that no preferable alternative sites are potentially available which would result in a development that would be less visually intrusive, contrary to Policies CC7 and OU3 of the Reading Borough Local Plan (2019) and the NPPF (2021).

INFORMATIVES

I00: Plans

The refusal relates only to the following plans and information as received by the local planning authority:

Plans and other documents considered:

- RDG20574_RDG211_89986_RG6856_GA_REV_B_Issue B – 002 Site Location Plan dated 28 March 2023, received 1 April 2023
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