

DELEGATED APPLICATION REPORT

Ward:

App Ref: 230158/TEL

Address: Junction Of, Cromwell Road and Henley Road, Caversham, Reading

Proposals: Application for prior notification of Proposed 5G telecoms installation - 15m street pole ancillary equipment cabinets and associated ancillary works.

Case Officer: Beatrice Malama

Applicant: CK Hutchison Networks (UK) Ltd

Date received (valid from): 11 February 2023 **Target Decision date:** 8 April 2023

1. SITE DESCRIPTION

The site is located within Caversham in an area which is predominantly residential comprising mainly of 20th century two storey detached, semi-detached and terraced properties.

The proposal site is on highway land located south of Henley Road and north of 82 Cromwell Road near the junction of Henley and Cromwell Roads. The site is adjacent to the boundary of 82 Cromwell Road. Located south west of the site is a junction where four roads meet and these are Prospect Street, Peppard, Westfield and Henley Roads. Queen Anne's School is located north-east of the site and beyond which is a Listed Building. The site does not fall within a conservation area however it is within an Air Quality Management Area.

2. BACKGROUND, PROPOSAL AND SUPPORTING INFORMATION

Prior notification ref. 220985/TEL for a proposed 5G telecommunications installation: 18m tall street pole and 3 additional ancillary equipment cabinets and associated ancillary works at pavement adjacent 82 Cromwell Road was refused on 26 August 2022.

The current resubmission seeks prior notification for the proposed installation of an H3G 15m street pole and three additional equipment cabinets by telecommunications code systems operators. The difference between the previously refused proposal and the current submission is in terms of the design of the antenna and overall height of the proposed street pole which has reduced from 18m to 15m.

Plans and Documents Considered:

- RDG21119_RDG186_85944_RG6882_GA_REV_B_Issue B - 002 Site Location Plan dated 7 February 2023, received 11 February 2023
- RDG21119_RDG186_85944_RG6882_GA_REV_B_Issue B - 265 Proposed Site Elevation dated 7 February 2023, received 11 February 2023
- RDG21119_RDG186_85944_RG6882_GA_REV_B_Issue B - 215 Proposed Site Plan dated 7 February 2023, received 11 February 2023
- RDG21119_RDG186_85944_RG6882_GA_REV_B_Issue B - 001 Drawing Register dated 7 February 2023, received 11 February 2023

- The Declaration of ICNIRP Compliance dated 7 February 2023, received 11 February 2023
- Developer's Notice to Planning services and Highways Services ref: RDG21119 - CROMWELL ROAD, dated 10 February 2023, received 11 February 2023
- 5G Site Specific Supplementary Information and Planning Justification Statement ref: RDG21119 dated 10 February 2023, received 11 February 2023.
- Government Statement on digital connectivity dated 7 March 2019, received 11 February 2023
- 5G Health and Network Briefing received 11 February 2023
- Application Form dated 11 February 2023, received 11 February 2023

3. RELEVANT PLANNING HISTORY

220985/TEL - Application for prior notification of proposed development by telecommunications code systems operators - Proposed 5G telecoms installation. 18m street pole and 3 additional ancillary equipment cabinets and associated ancillary works - refused - 26 August 2022

Reasons for refusal:

1. The proposed 18m high 5G monopole 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 surrounding area, contrary to Policies CC7 and OU3 of the Reading Borough Local Plan (2019).

2. The proposed development, 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 Policy OU3 of the Reading Borough Local Plan (2019) and the NPPF (2019).

4. CONSULTATIONS

4.1 Internal:

RBC Natural Environment - No objection to this proposal

RBC Environmental Protection - *"A noise assessment has not been submitted with the application and therefore I cannot determine the likely noise impact of the proposal and whether the proposals are acceptable. I therefore recommend refusal unless a noise assessment can be submitted and considered by us before the application is determined".*

RBC Transport - No Objection - comment received on 1 March 2023 as follows:

All of the equipment will be located on the footway on highway land. 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 the footway is wide in this location.

Therefore, there are no transport objections to this proposal subject to the suggested informatives.

Ward Members: Cllrs Matt, Gavin & Lanzoni. The following objection was received from the ward members:

1. At 15metres high, compared to 18m, it isn't materially different to the previous application so we don't support it.
2. In the application, it says no school is within 400 metres. Queen Annes School is right behind the location.
3. The applicant has not demonstrated they've looked for alternate locations, in particular locations further away from residential properties.

4.2 External:

Members of the public were consulted from 16 February 2023 and were given 21 days for comments to be received by the Local planning Authority. 4 letters in support of the proposal and 43 objections were received.

Support - below are the comments received:

- Pleased to see this advanced technology coming to our local area.
- It would be so useful to be able to have reliable 5G coverage in our local area, and 5G masts are necessary for this.
- It has been shown that 5G masts do not affect human health.
- We should treat these masts as part of general infrastructure, much like electricity connections to houses.
- This work is necessary to build a functioning mobile infrastructure so that we have effective 5G coverage across the Caversham area.
- If the mast was erected further out away from the main streets and residential buildings, the strength/signal and therefore effectiveness/efficiency of the 5G will also be less for the local residents/businesses - who are the very people the mast is serving to provide benefit for.
- No houses or buildings directly face the proposal site and therefore no visual harm
- The mast would add quite a nice focal point to an otherwise dull and boring part of the road.
- To mitigate any potential visual harm, disguise the mast in artificial greenery i.e. make it look like a tree.

Objections

The main reasons for objecting are summarised as follows:

- Too close to residential properties and schools
- Consider alternative options such as site sharing - no evidence provided that other options have been considered
- The 15 metre mast will dominate the skyline
- Adverse impact on the visual amenity of the surrounding area which consists mostly of two storey terraced Victorian and Edwardian houses
- Proposal is close to Queen Anne's school, subjecting young people to possible harm
- The top of Westfield Road had to be repaired within the last few years because of subsidence. The site is within 5m of this drop and I am concerned that the mast could collapse.

- Locations at D3 and D6 were discounted because they were in a residential area. The proposed site is within 5m of 82 Cromwell Road and is no less residential.
- If the mast were sited next to The Last Crumb and near to the allotments it would be far less intrusive and within the yellow rectangle.
- The site is on a higher ground than Cromwell Road and there are no trees to screen to screen the equipment therefore the proposed 15m high pole would dwarf all the existing nearby structures and would be an overpowering visual intrusion
- the cabinets are nearly 2 metres high and will obstruct the pavement
- May obscure visibility which would be a hazard to the road users.
- High radiation would cause harm to health and a greater health risk to children
- Adverse impact on property values
- Selected site an accident spot - any impact with the mast would cause it collapse on top of the nearby houses.
- Detrimental impact to the environment and health of the of the residents plus amplified noise issues
- the pole should be positioned in a less populated area.
- This area already receives good 5G and do not understand the need for further intrusive infrastructure.
- 5G is required but not by any price
- What controls will be in place to monitor emissions. How often will emission checks be carried out and presumably they will be done by independent body. No details of potential controls are given
- What impact will the mast have upon operation of electronic, radio or satellite equipment in houses located near to mast.

Queen Anne's School - An objection was also received from Queen Anne's School as follows:

- Harm to visual amenity
- Insufficient information on alternative sites
- We are a school of around 430 girls, aged 11-18. 50% of our students are day students and 50% are boarders who live here 24/7. We have around 100 staff, many living on campus. In addition, we open many of our facilities all year round to children and adults from the wider community. The health, safety and well-being of our school community is paramount and we object to a mobile mast being located so close to our campus.
- We would point out in particular that there is concern that insufficient research has been done on the effects of the concentration of 5G masts, as opposed to simply following the ICNIRP findings.
- The site specific supplementary information prepared by Dot Surveying states that no schools are within 400m of the proposed site which is clearly untrue.

Reading East MP - Mr. Matt Rodda - an objection received is summarised as follows:

- Apart from a reduction in height from 18m to 15m, the proposal closely resembles the earlier refused prior approval at the same site
- The proposed mast would still be 3 times the height of any nearby structure or trees and thus would have an adverse visual impact on the area
- Echoes the resident's concerns regarding the impact on site lines, a potential hazard to road users and pedestrians

- there are already significant road safety concerns in this area due to the lack of pedestrian crossings at this particular junction
- 5G infrastructure is important however discussions with residents and the Council are necessary to explore a wider range of options which will reduce the visual impact of masts.

CADRA objection. It impacts views in the area as well as driver and pedestrian safety. It is adjacent to a school and there is no evidence investigation into alternatives.

Planning Officer Comment - the above concerns have been addressed in the 'Appraisal' section of the report.

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. Relevant Policies

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
- EN14: Trees, Hedges and Woodland
- OU3: Telecommunications Development
- TR3: Access, Traffic and Highway-Related Matters

6. 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.

6.1 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.

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 two viewing angles based on the flow of vehicle traffic within the surrounding area.



Fig 1. Aerial image showing the proposed location of the antenna and three different 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 south-west of the proposal site on Henley Road.
	Viewing Angle 2	The view to be appraised north-east of the proposal site on Henley Road.

6.2 Siting and Appearance

The proposed site lies on highway land on Henley Road adjacent to 82 Cromwell Road. The site is near the junction of Henley and Cromwell Roads and it is located on the southern side of Henley Road and north of 82 Cromwell Road. The area is predominantly residential. Within the site's immediate surrounding are detached, semi-detached and terraced dwelling houses and Queen Anne's School. There is a listed building within 100m of the proposal site. Henley Road is located on a higher ground than the streets located south of the site.

There are existing street poles dotted around on Henley Road and nearby Roads with the closest located across Henley Road and opposite the site. The northern side of Henley Road is lined with tall mature trees whereas the southern part only has a small number of trees. Due to the site's prominent location with no trees nearby to act as a screen, it is very visible from all directions.

The proposal is for the installation of a 5G 15m high street pole and 3 no. additional equipment cabinets and ancillary works. The proposed equipment is required for improved network coverage and capacity, particularly in relation to 5G services. In addition, the proposed equipment is required in order to assist with meeting the Governments aims to roll out 5G technology.

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".

The submitted Site Specific Supplementary Information (SSSI) on page 5 states that *"the proposed design has been selected to minimise visual impact upon the streetscape by integrating with the existing built environment. The design of the proposed antenna and ground-based cabinets is considered to be the least visually intrusive option available"*. The SSSI on page 7 further states that the proposed *'Street Works' 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 by integrating with existing street furniture, the Council does not agree with the above claim. The existing nearby street poles are approximately 10m tall of which the closest one is almost invisible as the upper part of the pole is completely screened by the branches/leaves of a nearby tree. The adjacent two storey detached house is approximately 5m in height and is on a lower ground than the proposal site. At 15m tall, the proposed monopole would be two to three times the height of the surrounding structures including the adjacent two storey houses. The proposed monopole would significantly exceed the height of any nearby structures and thus would be clearly visible from a wider radius resulting in visual harm of the immediate and wider surrounding area. The visual impact of the monopole

would be exacerbated by the site's prominent location at a junction and on a higher ground than the land to the south where its height would be much more pronounced.

Although there are a number of existing street poles within the immediate surrounding of the site, the proposed 15m high monopole would be much greater in height than any surrounding street infrastructure. In addition, it would be much bulkier than the existing street poles, which have a slender design. Given the design, height, bulk and its prominent position on a higher ground and at a junction, the proposed 15m high monopole would appear as an overly prominent, obtrusive structure that would tower above other street furniture and other properties that would surround it. Located at the junction of Cromwell and Henley Roads and in close proximity to a busy four way junction south-west of the site, it would contrast unsympathetically with the existing character of the area.

The applicant acknowledges that *“the proposed installation of additional equipment would result in a localised visual increase”* whilst claiming that *“this will not overly detract from the character of the existing streetscape”*.

The applicant has not submitted any compelling supporting information to justify that the proposal would not detract from the character of the surrounding area. The proposed telecommunications equipment on this part of the highway would cause a significant change in the appearance of the area and its surrounding in comparison with the existing context.

Although it is acknowledged that the applicant has made an attempt to reduce the height of the mast from 18m to 15m and the design of the mast antenna, there is no material difference between the previously refused application ref: 220985/TEL and the current resubmission ref: 230158/TEL and therefore the proposed changes are not considered adequate to overcome the reasons for refusal as highlighted under section 3 (Relevant Planning History) of this report

Whilst the Council acknowledges the importance of installing the proposed equipment and the benefits it would bring about within the area in terms of technological advancements in communications, these benefits are not considered to outweigh the adverse visual impact the proposal would have on the character and appearance of the area.

Furthermore, the National Planning Policy Framework (NPPF) (Feb 2021) states that *“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 (....)”.

On page 3 of the submitted SSSI document, the applicant states that “*no schools have been identified within 400m of our proposed site*” as such no consultations with school/college were carried out prior to the submission of the application.

The above statement is not true as there is a school (Queen Anne’s School) located approximately 60m north east of the site on Henley Road. In addition, there is a listed building to the rear of Queen Anne’s school which is located within 100m of the site. However, the presence of this heritage asset has not been acknowledged and the impact of the proposal on this important heritage asset has not been highlighted.

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 (2019). On this basis the proposal is recommended for refusal.

6.3 Amenity and Accessibility

The site is located adjacent to the boundary fencing of 82 Cromwell Road which is a two storey detached dwelling house. Although the proposed monopole would be more than three times the height of any nearby buildings and trees and in close proximity to residential properties, this is not considered to adversely impact the living conditions of nearby residents. Whilst it is acknowledged that the proposal would likely result in some level of shadowing of nearby residential properties and would likely have an overbearing effect to a certain degree, it is considered unlikely that it would significantly harm the living conditions of nearby residents to the point of refusal.

In accordance with the accessibility and ease of movement aspect of policy TR3 of the Reading Borough Local Plan, the proposed development is considered to allow for appropriate movements along the adjacent pathway north of the site on Henley Road. This is also confirmed by Reading Borough Council Transport that the proposed development would not compromise highway safety. 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 the footway is wide in this location. In this regard, the proposed development is considered to allow for the free movement of highway traffic in accordance with policy TR3 of the Reading Borough Local Plan.

6.4 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.

Similarly Policy OU3 of the Reading Borough Plan (2019) requires that alternative sites and site-sharing options be investigated fully and that it should be demonstrated that no preferable alternative sites are potentially available which would result in a development that would be less visually intrusive.

The evidence contained within the Site Specific Supplementary Document shows that a total of six other sites were considered in the area and discounted for various reasons which included visibility splay issues, location in a residential area and unsuitable pavements. No compelling evidence however has been provided to demonstrate that no preferable alternative sites are potentially available which would result in a development that would be less visually intrusive. The amount of information supplied to justify the choice of site is limited. Without sufficient compelling evidence it is difficult for the Council to assess if a thorough and robust search was conducted and thus it is difficult to ascertain if the selected site is the best possible available site within the designated search area.

Furthermore, site being in a residential area appears to be one of the reasons for discounting three of the sites, however it is unclear why the selected site was found to be the best option as it is also within a densely populated residential area and in close proximity to a lot of low rise dwelling houses and a school. Further, it is unclear at what distances these would be, particularly in comparison to the selected site which does have numerous housing units in very close proximity. The sites appear focused on highway land without proper consideration of all available alternatives. Given the limited assessment of alternative sites and supporting evidence in respect of each site, and insufficient information provided to justify 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.

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. This therefore forms the second reason for refusal.

6.5 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 application. This certifies that the proposed development (which also takes account of the cumulative effect of emissions from the proposed installation and all nearby base stations) 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.

7. 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 15m high 5G monopole 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 surrounding area, contrary to Policies CC7 and OU3 of the Reading Borough Local Plan (2019).
2. The proposed development, 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 Policy OU3 of the Reading Borough Local Plan (2019) and the NPPF (2021).

Informatives:

IF0: Positive and Proactive Working - refusal

The Local Planning Authority has worked positively and proactively with the applicant to see if relevant concerns could be resolved to allow permission to be granted. However, that has not been possible within the prescribed target and therefore the decision to refuse planning permission has been taken.

I00: Plans

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

Plans and other documents considered:

- RDG21119_RDG186_85944_RG6882_GA_REV_B_Issue B - 002 Site Location Plan dated 7 February 2023, received 11 February 2023
- RDG21119_RDG186_85944_RG6882_GA_REV_B_Issue B - 265 Proposed Site Elevation dated 7 February 2023, received 11 February 2023
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