

DELEGATED APPLICATION REPORT

Ward: Caversham

App Ref: 220985/TEL

Address: Street Outside, 82 Cromwell Road, Caversham, Reading, RG4 5EB

Proposals: 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.

Case Officer: Beatrice Malama

Applicant: CK Hutchison Networks (UK) Ltd

Date received (valid from): 5 July 2022 **Target Decision date:** 30 August 2022

1. Site Description and Surrounding Area

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. Proposal and Supporting Information

Prior approval is sought for the proposed installation of a 5G street pole and 3 additional ancillary equipment cabinets and associated ancillary works by telecommunications code systems operators. The pole would be 18m high with a minimum diameter of 0.36m and the antennas measuring approximately 0.8m.

Plans and Documents Considered:

Drawing No: RDG21119_RDG186_85944_RG6882_GA_REV_A - 002 Site Location Plan

Drawing No: RDG21119_RDG186_85944_RG6882_GA_REV_A - 265 Proposed Site Elevation

Drawing No: RDG21119_RDG186_85944_RG6882_GA_REV_A - 215 Proposed Site Plan

RDG21119_RDG186_85944_RG6882_GA_REV_A- 001 Drawing Register

5G Health and Network Briefing Note

Government Statement dated 7th March 2019

Letter to the Head of Planning, Highways and Property Services dated 5th July 2022
Declaration of Conformity with ICNIRP dated 21 June 2022
Site Specific Supplementary Information dated 5 July 2022
Received by the Local Planning Authority on 5 July 2022

3. Relevant Planning History

No relevant history

4. Consultations

4.1 Internal:

RBC Natural Environment - No objection to this proposal - Comment received on 12th July 2022.

RBC Transport - No Objection - comment received on 10 August 2022 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: No comment however an objection was received from Reading East MP, Mr. Matt Rodda summarised as follows:

- Due to the size of the mast, it would dominate views along a historic Victorian street.
- No screening by trees or other buildings.
- Would be visible from a range of angles.
- 5G infrastructure is important however discussions with residents and the Council are necessary.

4.2 External:

Letters of consultation were sent on 12/07/22 to the owners and occupiers of properties located within the site's immediate surrounding area. In addition, a site notice was displayed for 21 days. 17 objections were received and the main reasons for objecting are summarised as follows:

- A danger too properties nearby
- Adverse impact on the visual amenity of the surrounding area which consists mostly of two storey terraced Victorian houses

- Proposal is close to Queen Anne's school, subjecting young people to possible harm
- The site is on a higher ground than Cromwell Road therefore the proposed 18m high pole would dwarf all the existing nearby structures
- The need for another phone mast is questionable.
- Overbearing
- May obscure visibility which would be an hazard to the road users.
- Harm to health outweighs the benefits

In addition, an objection was also received from Queen Anne's School as follows:

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.

- The site specific supplementary information prepared by Dot Surveying states that no schools are within 400m of the proposed site.
- The proposed mast will be directly opposite the school, some 20 metres from our boundary.
- It is no more than about 120 metres from our main school building.
- We did not receive a notice that any application had been made - **Owners and occupiers of nearby properties were consulted by letter and a site notice was displayed on site for 21 days.**

***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 three 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 18m 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 and the applicant has confirmed that 18m is the minimum height required for the monopole in order to bring the benefits of 5G in the area.

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. The proposed 18m monopole would comfortably exceed these heights as it is located on a higher ground than its immediate surrounding especially the area south of the site, and would be clearly visible from a wider radius. The visual impact of the monopole would be exacerbated by the site’s prominent location at a junction where its height would be much more pronounced.

Although there a number of existing street poles within the immediate surrounding of the site, the proposed 18m 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 18m 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. Further it would appear as an alien and uncharacteristic feature 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”*. However, the applicant has not submitted any supporting information to justify the claim that this proposal would not detract from the character of the existing streetscape. It is not clear therefore if any attempts to make the proposed equipment less visually intrusive such as through the use of a more sympathetic design has been made. 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. The siting and design of the proposal makes little attempt to minimise its visual impact, through innovative design such as concealment options.

Whilst the Council acknowledges the importance 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. It appears a thorough and robust research of the area was not carried prior to the submission of the application. 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. However, information with details of the analysis of various sites was not supplied making it difficult for the Council to assess if a thorough and robust search was conducted. In addition, without this information 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 main 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 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).

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:

Drawing No: RDG21119_RDG186_85944_RG6882_GA_REV_A - 002 Site Location Plan

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