

DELEGATED APPLICATION REPORT

Ward: Caversham

App Ref: 230313/TEL

Address: Site at Junction of Henley Road and Donegal Close, Caversham, Reading

Proposals: Application for prior notification of proposed 5G telecoms installation, provision OF 15m tall telecommunications monopole mast with associated equipment cabinets

Case Officer: Beatrice Malama

Applicant: CK Hutchison Networks (UK) Ltd

Date received (valid from): 10 March 2023 **Target Decision date:** 5 May 2023

1. SITE DESCRIPTION

The site is located within Caversham a predominantly residential area. The proposal site is on highway land located north of Henley Road opposite 87B Henley Road and the junction of Henley Road and Donegal Close. The site is adjacent to the boundary of Queen Anne's sports grounds. The site does not fall within a conservation area, however, it is within an Air Quality Management Area.

2. BACKGROUND, PROPOSAL AND SUPPORTING INFORMATION

Planning Application ref. 221723/TEL for prior notification of proposed 5G telecoms installation: H3G 18m street pole and additional equipment cabinets by telecommunications code systems operators was refused on 9 January 2023

The current resubmission (ref. 230313/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:

- RDG19619_RDG203_87883_RG6811_GA_REV_B_Issue B - 002 Site Location Plan dated 10 March 2023, received 10 March 2023
- RDG19619_RDG203_87883_RG6811_GA_REV_B_Issue B - 265 Proposed Site Elevation dated 10 March 2023, received 10 March 2023
- RDG19619_RDG203_87883_RG6811_GA_REV_B_Issue B - 215 Proposed Site Plan dated 11 March 2023, received 10 March 2023
- RDG19619_RDG203_87883_RG6811_GA_REV_A - 001 Drawing Register dated 10 March 2023, received 10 March 2023
- Government statement dated 7 March 2019, received 10 March 2023
- The Declaration of ICNIRP Compliance dated 7 March 2023, received 10 March 2023
- Developer's Notice to Planning Services and Highways Department ref: RDG19619 - PEPPARD ROAD, dated 10 March 2023, received 10 March 2023

- 5G Site Specific Supplementary Information and Planning Justification ref: RDG19619, dated 10th March 2023, received 10 March 2023.
- 5G Health and Network Briefing received 10 March 2023
- Application Form dated 10 March 2023, received 10 March 2023

3. RELEVANT PLANNING HISTORY

- Application ref. 221723/TEL - Application for prior notification of proposed 5G telecoms installation: H3G 18m street pole and additional equipment cabinets by telecommunications code systems operators (amended description) - application refused - 9 January 2023
- There are a number of other existing telecommunications masts near the proposed site.

4. CONSULTATIONS

4.1 Internal:

RBC Natural Environment - In terms of potential impact on the Root Protection Area, whilst the pole is likely to be in the theoretical RPA, given the more favourable rooting environment in the school field and works that have already taken place in the pavement, this is not a concern.

The proposed pole will be higher than the adjacent tree currently and probably at its ultimate height, given the species (from Google Street view, it appears to be a Rowan), so from that respect it would be acceptable. However, the canopy spread of the tree is not accurately shown on the proposed plan; with the plan showing the canopy confined within the school boundary. It can be seen that this is not the case from the aerial and street view photos. The applicant should, therefore, confirm what pruning would be required to allow for the installation of the pole and whether there would be an expectation that the canopy be pruned back to the boundary in perpetuity. Hopefully this will be a simple query that can be resolved.

Lastly, given the trees within the school along the front boundary (including those protected by TPO 1/23), the applicant should confirm where the electricity to the proposals will be connected from - hopefully this will also be a simple question.

Officer Comment: The applicant was asked to confirm the above, however, no comments were received at the time of reporting.

RBC Transport - There are no transport grounds to object to this proposal, subject to the suggested informatives.

RBC Ecology - The main habitats to be affected by the proposals are the footway (hard standing) which is of low ecological value. As such, since protected species are unlikely to be affected by the proposals, there are no objections to this application on ecological grounds.

Ward Members: No comment however an objection was received from Reading East MP, Mr. Matt Rodda summarised as follows:

- Would be visible to many residents
- Would be out of keeping with the local environment which includes gardens and the playing field of Queen Anne's School.
- Visually intrusive -
 - There an existing mast nearby which should be shared or adapted if increased connectivity in the area is needed.

Mr Rodda hopes the developer looks for less intrusive sites and works with the residents and the council to find suitable alternative sites

4.2 External:

Letters of consultation were sent on 21 March 2023 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. 2 letters in support of the proposal and 12 objections were received and the main reasons for supporting and objecting are summarised as follows:

4.2.1 Support

- The proposed mast will improve signal in the area and has been shown to have no significant health impacts.
- We need better signal in our area, and makes 5G integrated internet much more reliable!
- Fully support this application, area requires 5G infrastructure.

4.2.2 Objections

- Almost identical to the previously rejected application 221723.
- Adverse impact on the visual amenity of the surrounding residential area.
- Nothing to mask it. It will dominate the area.
- Out of character with the highly residential setting of the area.
- No attempts to camouflage the mast.
- Adverse impact on quality of life of nearby residents.
- With no trees around, the area will take on an industrial look.

- No compelling evidence to show the need for another mast as there is adequate connectivity.
- The ecological survey only considers the footpath along Henley road, but has not given any ecological consideration to impacts on adjacent Queen Anne's land.
- Reduce the value of nearby properties.
- Harmful noise emissions.
- Contributing to visual clutter resulting in detriment to the visual amenities of the surrounding area which is residential with a lot of Victorian properties.
- There needs to be some co-ordination and co-operation between suppliers.
- Proposal is close to Queen Anne's school.
- Proximity to an existing mast. It's very close to an existing mast which is also out of keeping with the area.
- Referring to NPPF section 185, sentence 1. Has it been proven that there is no effect (including cumulative effects) of pollution on health, living conditions and the natural environment?
- The proposed mast together with the existing nearby masts would likely have a cumulative impact on human health, wildlife and the environment.
- Potential hazard to road users during mast installation and future maintenance works.

CADRA - The site of the proposed mast is by Queen Anne's School. The mast would dominate the street scene, towering over neighbouring properties. Alternative, more innovative solutions should be examined.

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 west of the proposal site on Henley Road.
	Viewing Angle 2	The view to be appraised east of the proposal site on Henley Road.
	Viewing angle 3	South of the Proposal site on Donegal Close



Figure 2: Viewing angle 1 - west of the proposal site



Figure 3: Viewing angle 2 - east of the proposal site



Figure 4: Viewing angle 3 - south of the site on Donegal Close

6.2 Siting and Appearance

The proposed site lies on highway land on north of Henley Road. The site is adjacent to the boundary of Queen Anne's sports ground and opposite 87B Henley Road and the junction of Henley Road and Donegal Close. The area is predominantly residential.

There are a number of vertical elements located near the site on Henley Road which include some trees, street poles and telecommunications masts. There are at least two existing masts located to the east of the site. To the west of the site on Henley Road is a grade II listed building (Queen Anne's School main block and chapel).

The proposal is for the installation of an H3G 5G 15m high street pole and 3 no. additional equipment cabinets. 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 2 states that *“It is our opinion that the proposed design presents a better ‘fit’ within the local community and immediate street scape, offering a reduced visual impact upon an area of adopted highway identified.”*

The SSSI on page 4 further states that the *‘Proposed location of a new mast shown above will assimilate well into the immediate street scene and not be detrimental’*.”

The applicant claims that the mast has been designed so as to be in keeping with the NPPF guidelines by stating that *“the proposed design has been selected to minimise visual impact upon the streetscape by integrating with the existing built environment”* and that *“the proposed ‘Streetworks’ design has been selected to minimise visual impact upon the street scene by integrating with existing street furniture”*

The Council disagrees with the above claims. The existing nearby street poles are approximately 10m tall. The nearby residential properties south of the site are two storey. The proposed 15m monopole would significantly 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 without any form of screening where its height would be much more pronounced. In addition, there is a Grade II listed building (Queen Anne’s School main block and chapel) to the west of the site. The presence of this heritage asset, however, has not been acknowledged and the impact of the proposal on this important heritage asset has not been highlighted.

Although there are a number of existing street poles within the immediate surroundings 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. No attempts have been made to mimic some of the nearby structures so as to be in keeping with the existing streetscape. Below is an example of a nearby mast on Henley Road that was designed to look like nearby street poles.



Figure 5: Existing mast approximately 80m east of the site.

It is acknowledged that the applicant has attempted to modify the mast in order to address the reasons for refusing **application ref. 221723** as listed below:

- 1. The proposed 18m high monopole and its associated cabinets, by reason of its height, bulk and prominent location, would detract from the visual amenity and appearance of this part of Henley Road and the surrounding area, contrary to Policies CC7 and OU3 of the Reading Borough Local Plan (2019) and the NPPF (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).*

The applicant has proposed a reduction in the height of the mast from 18m to 15m and a change in design of the antenna. No other changes have been proposed. The Local Planning Authority, however, is not satisfied that the earlier reasons for refusal as listed above have been adequately addressed. Overall the proposed revisions do not address the fundamental concerns of height, bulk and prominence.

Given the design, height, bulk and its prominent position on a higher ground, the proposed 15m high monopole would appear as an overly prominent, obtrusive structure that would tower above other street furniture and nearby properties to the south. Furthermore, due to the site's prominent location with no trees nearby to act as a screen, it is very visible when viewed from all of the viewing angles and thus the harm to the character of the area would be very evident.

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 applicant seems to acknowledge that *“there will be a localised visual increase through the installation of additional apparatus”* but claims that *“this will not overly detract from the character of the existing streetscape”*.

The claim that the equipment will not overly detract from the character if the existing streetscape is not true.

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.

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 Queen Anne's School Sports ground. Although the proposed monopole would be significantly taller than any nearby vertical elements and in close proximity to residential properties, this is not considered to adversely impact the living conditions of nearby residents. Given the distance between the site and any nearby residential properties, it is considered unlikely that the proposed mast 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 Local Planning Authority (LPA) 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.

The applicant would appear to justify the choice of site by stating that *“In this location, existing mast sites are not capable of supporting additional equipment compliment to extend coverage reach across the target area and prospective ‘in-fill’ mast sites are extremely limited”*.

Whilst there may be limited alternative options, the applicant, however, has not provided any compelling evidence to prove that other sites were robustly investigated and discounted. The above statement does not provide any evidence to justify that there are no alternative sites within the area that are technically viable. For example there are two existing masts approximately 80m and 280m west of the site respectively which could have been investigated, however, there is no information to indicate these were considered. The lack of alternative sites still does not discount the need for less intrusive developments.

In view of the above, 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 monopole and its associated cabinets, by reason of its height, bulk and prominent location, would detract from the visual amenity and appearance of this part of Henley Road and the surrounding area, contrary to Policies CC7 and OU3 of the Reading Borough Local Plan (2019) and the NPPF (2021).
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:

I00: Plans

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

- RDG19619_RDG203_87883_RG6811_GA_REV_B_Issue B - 002 Site Location Plan dated 10 March 2023, received 10 March 2023
- RDG19619_RDG203_87883_RG6811_GA_REV_B_Issue B - 265 Proposed Site Elevation dated 10 March 2023, received 10 March 2023
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