

DELEGATED PRIOR NOTIFICATION APPLICATION REPORT

Ward: Southcote

App Ref: 221826/TEL

Address: Site Opposite, 118 Tilehurst Road, Reading

Proposals: Application for prior notification of proposed 20m high wraparound telecommunications street pole, 3 additional cabinets and associated works - by telecommunications code systems operators (amended description)

Case Officer: Beatrice Malama

Applicant: CK Hutchison Networks (UK) Ltd

Date received (valid from): 6 December 2022 **Target Decision date:** 31 January 2023

1. SITE DESCRIPTION AND SURROUNDING AREA

The application site is a grass verge located to the northern side of Tilehurst Road. The surrounding area is predominantly residential comprising of mainly two and three storey residential flats and terraced properties which are of similar style. The site is in close proximity to a pedestrian crossing and Tilehurst and Cranbury Roads junction located to the western and southern side of the site. There are a number of tall mature trees located to the eastern side of the site. The site is within an Air Quality Management Area.



Figure 1: Proposal Site (site visit photo taken 15/12/22)

2. PROPOSAL AND SUPPORTING INFORMATION

The proposal seeks for prior notification of proposed development by telecommunications code systems operators for the installation of a 20 high wraparound telecommunications street pole, 3 additional cabinets and associated works to be located at a site opposite 118 Tilehurst Road.

Plans/Documents Considered

- RDG24530_B35_GA_A_Issue A - 002 Site Location Plan dated 7 November 2022, received 6 December 2022
- RDG24530_B35_GA_A_Issue A - 210 Proposed Site Plan 7 November 2022, received 6 December 2022
- RDG24530_B35_GA_A_Issue A - 260 Proposed Elevation 7 November 2022, received 6 December 2022
- RDG24530_B35_GA_A_Issue A - 100 Existing Site Plan 7 November 2022, received 6 December 2022
- RDG24530_B35_GA_A_Issue A - 100 Existing Site Elevation 7 November 2022, received 6 December 2022
- Government statement dated 7 March 2019, received 6 December 2022
- Developer's Notice to The Chief Highways Engineer ref: RDG24530, dated 26 November 2022, received 6 December 2022
- Developer's Notice to The Chief Planning Officer ref: RDG24530, dated 30 November 2022, received 6 December 2022
- Clarification Of The Declaration Of ICNIRP Compliance notice to the Chief Planning Officer dated 11 October 2022, received 6 December 2022
- 5G Site Specific Supplementary Information and Planning Justification ref: RDG24530 dated 30 November 2022, received 19 December 2022
- Application Form dated 30 November 2022, received 6 December 2022
- Discounted Sites Plotted received 19 December 2022
- Flood Map for Planning Ref. RDG24530 Tilehurst Road dated 23 November 2022, received 6 December 2022

Other documents submitted

- GSMA - 5G EMF Briefing - Exposure and Safety received 6 December 2022
- A Councilor's Guide to Digital Connectivity received 6 December 2022
- HM Government Ofcom - 5G Mobile Technology: a guide received 6 December 2022
- Allaying health concerns regarding 5G and exposure to radio waves - An IET guide for policy makers and local planning authorities 2nd edition, received 6 December 2022
- Matt Warman MP Letter to LPA Chiefs dated 24 May 2021, received 6 December 2022
- Matt Warman MP letter to LPA Chiefs on 5G broadband dated November 2019, received 6 December 2022
- MobileUK 5G Health Fact Sheet V1, received 6 December 2022
- MobileUK 5G Local Authority Toolkit, received 6 December 2022
- RDG24530 Battle Primary Academy CoG pre-app letter, received 6 December 2022
- RDG24530 Battle Primary Academy HT pre-app letter, received 6 December 2022
- RDG24530 Cllr Griffith pre-app letter, received 6 December 2022
- RDG24530 Cllr Griffith pre-app letter, received 6 December 2022
- RDG24530 Cllr Hacker pre-app letter, received 6 December 2022
- RDG24530 Consultation Plan, received 6 December 2022
- RDG24530 LPA pre-app letter, received 6 December 2022
- RDG24530 St Edwards CoG pre-app letter, received 6 December 2022

- RDG24530 St Edwards HT pre-app letter, received 6 December 2022
- RDG24530 Western Elms Day Nursery pre-app letter, received 6 December 2022

3. RELEVANT PLANNING HISTORY

None related to this site

4. CONSULTATIONS

Internal Consultation

Transport Development Control comment - *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. However, it should be noted that this is Council owned land and separate permissions may be required from the Asset's Management department within the Council. A crane license must be obtained for work carried out on the highway.*

Therefore, there are no transport grounds to object to this proposal subject to the Suggested informatives."

Natural Environment comment - *I am satisfied that there won't be unacceptable direct impact on the adjacent important street trees from installation of the pole and cabinets.*

The Proposed Site Plan indicates existing service routes and it is assumed that the new equipment can utilise those to minimise the excavations in this verge. However, it is appropriate to comment on the potential impact of site activity during installation and to ensure the applicant is aware that pruning of those trees would not be allowed in the future to maintain their signal, hence that they should have considered this in the choice of siting.

I therefore have no objection subject to the suggested Informatives being added to the decision.

Ward Members - A letter of representation was received from Councillor Jason Brock raising concerns about the applicant's assessment of alternative locations.

Public Consultation

Nearby residents were consulted by letter and site notice. Four objections have been received and summarised as follows:

- Risk to pedestrians and highway users
- No assessment to show lack of harm to nearby trees
- Harm to visual amenity
- The proposed location falls under Southcote Ward and not Battle Ward, no Southcote ward councillors have been consulted
- The applicant has an existing 5G network that covers the entire Borough therefore the need for additional masts not justified
- Alternative sites not considered
- Devalue nearby properties
- Risk to health of nearby residents

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

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'. The following local and national planning policy and guidance is relevant to this application:

National Policy

National Planning Policy Framework

National Planning Practice Guidance

Reading Borough Local Plan (2019)

CC7 (Design and the Public Realm)

CC8 (Safeguarding Amenity)

TR3 (Access Traffic and Highway-related Matters)

OU3 (Telecommunications Development)

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. As this is not a full planning application, the LPA is unable to impose any additional conditions.

The applicant was informed via email during the application that prior approval was required. The applicant was also advised that, as per The Town and Country Planning (General Permitted Development) (England) Order 2015, Schedule 2, Part 16 (A.3 (7) (C)), the applicant would be notified within a period of 56 days from the receiving of the application as to whether or not prior approval is given or refused (by 31/01/2023).

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 whether 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.

Appearance and Visual Impact



Figure 2: Image indicating the location of the proposed antenna and viewing angles to be assessed

Icon	Icon Name	Description
	Proposed Antenna	The proposed location for the monopole and associated cabinets.
	Viewing Angle 1	View of site east of Tilehurst
	Viewing Angle 2	View of site east of the site on Cranbury Road
	Viewing Angle 3	View of the site from the west on Tilehurst Road



Figure 3: Viewing angle 1 on Tilehurst Road - from the east (site visit photo taken 15/12/22)



Figure 4: Viewing angle 3 on Tilehurst Road - from the west (site visit photo taken 15/12/22)

The proposed development includes the erection of a 20m high wraparound telecommunications street pole, 3 additional cabinets and associated works. The proposed monopole would have a total of 6 antennas at the top.

The proposed 20m tall monopole would appear prominent when viewed from all of the viewing angles 1, 2 and 3. This would be exacerbated by its prominent siting on a higher ground and a very prominent location. In addition, given that there are no structures around the site which are tall enough to screen the equipment, the proposed development would appear to be a dominant feature of this part of the area. It is considered that given the residential and suburban context of the surrounding area, the proposed development would appear out of place and intrusive. The applicant within the submitted Site Specific Supplementary Information (SSSI) document appears to acknowledge on page 7 that the designs would appear alien in the selected location. However, it is unclear if any attempts have been made to make the proposed development more in keeping with the surrounding area. The applicant appears to claim that the proposal is more visually sensitive and much easier to assimilate into the street scene. The applicant further claims that the proposed monopole will not appear incongruous within the streetscene and furthermore claims that a line of mature trees adjacent to the site will help mitigate visual impact.

The built environment of the surrounding area is predominately two and three storey dwelling houses which are significantly shorter than the proposed monopole. There are some trees in close proximity to the site however the closest is approximately 20m east of the site and none of the nearby trees compares, in terms of height, with the proposed monopole. Without any form of screening, given the height and bulk, the proposed monopole would adversely harm the character and appearance of the area. In addition, given the prominent siting, the proposed 20m tall monopole and its associated cabinets would appear as an overly prominent, obtrusive feature which would contrast unsympathetically with the existing character of the area.

The “SSSI” document states that *“The presence of other linear urban structures such as lighting columns and telegraph poles will assist with assimilation in the streetscene... The design of the column resembles as closely as possible to other vertical structures within the immediate area such as lighting columns and telegraph poles. These vertical structures will help the proposed installation of this radio base station assimilate with the surrounding area”*. The above claim is not accepted.

Whilst there are a number of existing vertical elements of street furniture within the site’s immediate surrounding area, they are not anything like the proposed monopole. The nearby street lighting poles are not as tall and as bulk as the proposed telecommunications equipment. The nearest street poles which are slender in design would be much shorter at approximately 8m tall.

The proposed 20m tall monopole would have a significantly greater, and detrimental impact on the skyline especially when viewed from the eastern and southern side of the site. The resultant impact on the visual amenity of the immediate and wider surrounding areas is not considered acceptable.

Paragraph 115 of the National Planning Policy Framework (NPPF) (Feb 2019) 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”*. This is not considered to have been achieved in this instance, given the suburban character and appearance of the surrounding area. Policy OU3 of the Reading Borough Local Plan (Adopted November 2019) also applies and this states that telecommunications development will be permitted where apparatus is *“..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.”*. It is considered that the proposals do not go far enough to minimise the visual impact of the proposal within its setting and the surrounding area.

The applicant within the SSSI document states that *“These non-stealth designs are preferred by operators as they are structurally capable of hosting more equipment and give greater scope for antenna orientation and are thus more efficient structures”*.

The above statement clearly shows that the applicant acknowledges that the proposed development is not camouflaged and would not blend in with the surrounding however it would appear that the applicant is less concerned about the visual harm the proposed equipment would have on the surrounding area and thus no attempts to utilise less visually intrusive designs have been made.

The proposed development therefore would detract from the visual amenity and appearance of this part of Tilehurst Road and the immediate surrounding area, contrary to Policies CC7 and OU3 of the Reading Borough Local Plan (2019) and the NPPF (2021).

Impact on Residential Amenity

The proposal site is a grass verge located on the northern side of Tilehurst Road opposite 118 Tilehurst Road. Within the site's immediate surrounding area are two and three storey residential properties. Although the proposed monopole would be approximately twice the height of any nearby buildings or trees and in close proximity to residential properties, this is not considered to adversely impact the living conditions of nearby residents.

Transport and Accessibility

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. 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 equipment will be located within the grassed verge area. 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. However, the applicant is advised that this is Council owned land and should prior approval otherwise been granted, separate permissions may have been required from the Asset's Management department within the Council. In addition, a crane license would have been required to be obtained for work carried out on the highway.

Alternative Sites

The applicant has indicated within the submitted Site Specific Supplementary Information that a total of 10 alternative sites were discounted however a detailed analysis of each site has not been provided. The application has not been supported by sufficient detail to show that alternative sites have been robustly considered and discounted. In addition, the application has not provided compelling evidence to show that there is no other option within the area which would be less visually intrusive. Without any compelling supporting evidence, it is difficult to establish if the assessment of possible alternatives with reduced visual impact have been properly and robustly reviewed and discounted. Due to insufficient information provided and any compelling evidence 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.

Given the lack of sufficient detail being provided regarding alternative sites, it is difficult to assess whether the selected site is the most suitable site for this type of development. The proposal therefore has failed to demonstrate that possible alternatives, with reduced visual impact, have properly and robustly been reviewed and discounted by the applicant in line with guidance contained within the NPPF.

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 (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.

Conclusion

The siting and design of the proposed monopole and associated cabinets are not considered acceptable within the proposed context. The proposed 20m wraparound monopole and its associated cabinets would harm the visual amenity, character and appearance of the surrounding area. In addition, the application has failed to demonstrate that no preferable alternative sites are potentially available within the identified search area.

Recommendation

PRIOR APPROVAL NOT GIVEN - REFUSE

Reasons for refusal:

1. The proposed 20m high wraparound monopole and the associated cabinet equipment, by reason of their design, height, bulk and prominent siting, would appear as visually dominant, obtrusive and alien features in the streetscene, with consequent harm to the visual amenity, character and appearance of the surrounding area, contrary to Policies CC7 and OU3 of the Reading Borough Local Plan (Adopted November 2019) and the NPPF (2021).
2. Without sufficient detail and compelling evidence to justify the choice of site, the proposed 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).