

DELEGATED HOUSEHOLDER APPLICATION REPORT

Ward: Caversham Heights

App Ref: 220915/TEL

Address: Pavement outside Glendale House, Kidmore Road, Caversham, Reading

Proposals: Application for prior notification of Proposed 5G telecommunications installation: street pole and 3 additional ancillary equipment cabinets and associated ancillary works by telecommunications code systems operators.

Case Officer: Beatrice Malama

Applicant: CK Hutchison Networks (UK) Ltd

Date received (valid from): 21 June 2022 **Target Decision date:** 16 August 2022

1. Site Description and Surrounding Area

The proposal site is land located at the junction of Charlotte Close and Kidmore Road. The site which is on highway land is surrounded by residential properties. Kidmore Road and the wider area comprises mainly of two storey dwelling houses and flats. Located adjacent to the site is Glendale House which is a two storey blocks of flats. The street has a verdant character with numerous mature trees including Trees subject to Tree Preservation Orders on both sides of the street. Within the site's immediate surrounding are a number of street poles and trees of high amenity value. The site does not fall within a conservation 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 have a minimum radius of 0.36m with the antennas measures approximately 0.8m.

Plans and Documents Considered:

Drawing No: RDG21070_RDG188_86080_RG6878_GA_REV_A - 001 Drawing Register

Drawing No: RDG21070_RDG188_86080_RG6878_GA_REV_A - 002 Site Location Plan

Drawing No: RDG21070_RDG188_86080_RG6878_GA_REV_A - 265 Proposed Site Elevation

Drawing No: RDG21070_RDG188_86080_RG6878_GA_REV_A - 215 Proposed Site Plan

Site Specific Supplementary Information dated 21 June 2022

Declaration of Conformity with ICNIRP Public Exposure Guidelines dated 6 May 2022

Letter of Notification to the Head of Planning, Highways and Property Services dated 21 June 2022

Government Statement dated 7 March 2019

5G Health and Network Briefing note

Received by the Local Planning Authority on 21 June 2022

3. Relevant Planning History

No relevant history

4. Consultations

4.1 Internal:

RBC Natural Environment - objects to this application - *Comment received on 6th July 2022 as follows:*

As indicated on the Proposed Site plan, the cabinets and pole base are located under the canopy of one of the trees at Glendale House and the pole itself appears to be sited through the canopy. In addition, no arboricultural information has been provided to demonstrate the impact on these trees, including impact on their RPA from excavation for the foundations of the proposed structures and any pruning required to accommodate the pole. In addition, there are numerous additional trees along the same side of the road and directly opposite, most of which are subject to TPOs - comment is therefore required on required sight lines to demonstrate that a pole in this location will not require pruning of adjacent trees (foliage being a blockage to the 5G signal). The application fails to demonstrate no harm to trees of amenity value hence is contrary to EN14 and aims of our Tree Strategy and should therefore be refused.

RBC Transport - No Objection - comment received on 10 August 2022

I can confirm that the proposal is located on a grass verge at the back of the footway in a location that would not obstruct footfall or visibility splays from the adjacent junction. The Highway Authority therefore would have no objections to the proposal subject to the suggested informatives.

Ward Members:

Cllr Paul Carnell objection received on 25 July 2022 summarised as follows:

a) Siting and appearance

i. The siting of a 5G mast, 50' in height would be totally out of place in this location. The location proposed has been kept clear of obstructions as it increases the sight lines for traffic, particularly exiting Charlotte Close. Keeping this grass verge clear may also be protected by covenant. A 50' mast towering over the trees will ruin the amenity of the residents in the area, the mast will command the skyline.

ii. Most of the trees are protected by TPOs including the 2 which grow beside the proposed site. Any development on the verge would surely harm them, if not worse. When Reading has declared a climate emergency this would be unacceptable.

b) Alternative Sites - The search for an alternative, more acceptable, location is flawed, as it excludes Sheridan Avenue on the grounds that it is residential, yet Kidmore Road is similarly residential. Also there has been no suggestion of using alternative technology. Using smaller micro masts, attached to telegraph poles or streetlights would be much less obtrusive and given the lower power the health risks reduced.

c) Health Risks - The flats at Glendale Court, and other properties adjacent to the application must fall inside any reasonable safety perimeter. There is a nursery less than 300m away, which I believe is the safety limit for schools from a mast.

Cllr Isobel Ballsdon objection received on 21 July 2022 as follows:

My grounds are: the applicant hasn't sufficiently checked alternative locations, nor managed to design the plans to successfully minimise the impact on the character and amenity of the area.

4.2 External:

Letters of consultation were sent on 06/07/22 to the owners and occupiers of properties located within the site's immediate surrounding area. In addition, a site notice was displayed. 197 objections were received and the main reasons for objecting are summarised under the following themes:

1. Adverse impact on the visual amenity of the surrounding area

- size and scale
- Design and Bulk
- There has been no use of innovative design or siting
- Location in the middle of low-rise residential neighbourhood
- the extraordinary scenic beauty and highly valued landscaping
- unsightly obstruction to all that live in the location and be a very serious distraction and unsightly out-of-keeping street scape
- devaluing the beauty of the area and the value of nearby properties
- It is completely out of character with the Victorian Street and its protected trees
- No attempts have been made to blend the mast into its surroundings
- Other less offensive options do not appear to have been considered.
- The mast height would be an eyesore and overbearing to residents, it will be obtrusive and cause harm to the amenity of the area.
- This infrastructure devalues nearby properties due to visual impact and possibility/fear of harm
- A 50 foot (15m) high mast will clearly not be possible to camouflage and the equipment boxes will be clearly visible being directly placed beside the pavement.
- This mast would be intrusive and not at all in-keeping with the beauty of this road.
- At 50 ft tall, the mast would be almost double the height of the houses nearby, and would therefore be unsightly and disproportionately intrusive
- The design, height and bulk of the mast would detract from the visual amenity and appearance in this residential area, inhabited by various protected species of wildlife.

2. Adverse impact on Residential Amenity

- The noise from the cabinets will be **intrusive** and **disruptive to sleep**
- The proximity of the proposed mast to Glendale house.
- Erecting a mast at this location would lead to tenants being directly overshadowed by the mast and within close range of EM Radiation it emits.

3. Alternative site selection

- Alternative sites and options have not been explored such as small 5G micro cells can be located on lamp posts across the area with minimal visual impact
- Other, more discreet solutions should be found.
- A number of the alternative sites have been incorrectly deemed as non-viable. This includes D2 which following a personal site visit is eminently placed for coverage of a wide area of Hemdean road using a micro cell post.

- There is not detail on alternative and authentic site options and no analysis provided of the alternatives considered and authentic reasons for the choice made.
4. Harm to Natural Environment and important Biodiversity
 - Harm to Trees subject to Tree Preservation Order
 - Loss of important open space.
 - Harm to Protected Species
 - damaging effect it could have on wildlife, particularly nesting birds and insect populations
 5. Failure to consult with local residents
 - Unnecessary requirement for a 5G mast
 - The need is not well justified
 6. Harm to health
 - Very close to two residential apartment blocks
 - Objection due to the antennas being from just 20m from homes and the unknown risk to long term health as guidelines are based on short term exposure at a distance
 - It will be sited only a few meters from elderly residents homes.
 - There is growing evidence that 5G radiation is detrimental to people's health and wellbeing
 - The health and environmental concerns from 5G masts are especially devastating, the impact many scientists maintain that they have on wildlife, insects, bees and other pollinators
 - St Andrews Pre-Nursery school is within 300m, Albert Road playground is within 400m.
 7. Risk to pedestrians and other road users
 - a condition of Planning Approval that the strip of land for this proposed site was to be left free and unencumbered to ensure traffic sight lines were adhered to
 - Given that cars have crashed along this side of Kidmore road it represents an additional safety risk.

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.

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

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.

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 north west of the proposal site on Kidmore Road.
	Viewing Angle 2	The view to be appraised north of the proposal site on Charlotte Close.
	Viewing Angle 3	The view to be appraised south of the proposal site on Kidmore Road and from Dellwood Park.



Figure 2: View of the site on Kidmore Road - North-west of the site

(Case officer site visit 15/07/22)



Figure 3: View of the site - south of the site and at the junction of Dellwood park and Kidmore Road (Case officer site visit 15/07/22)



Figure 4: View of the site on Kidmore Road - south of the site (Case officer site visit 15/07/22)

Siting and Appearance

The proposed site lies on a grass verge on the Kidmore Road frontage of Glendale House, Charlotte Close on highways land. The site is at the junction of Charlotte Close and Kidmore Road and it is located on the eastern side of Kidmore Road. The area is predominantly residential and within the site's immediate surrounding are detached and semi-detached dwelling houses and residential flats. There are existing street poles dotted around on Kidmore Road, Charlotte Close and Dellwood Park with the closest being approximately 10m from the site. There is an existing pathway way adjacent to the site. Kidmore Road is a well treed road and adjacent to the site are two mature trees located within the boundary of Glendale House. Due to the site's prominent location, it is very visible from Charlotte Close, Dellwood Park and both sides of Kidmore Road.

The proposal is for the installation of a 15m 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 15m 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 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”.

The submitted Site Specific Supplementary Information (SSSI) 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 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 5m tall. The adjacent two storey Glendale house building is approximately 7m in height and the adjacent trees being approximately 6m tall. The proposed 15m monopole would comfortably exceed these heights, and would be clearly visible in both directions along Kidmore Road. Projecting well above existing canopies, the monopole would also be visible from a wider radius including Wrenfield Drive, Sheridan Avenue, St Andrew’s Road, Orwell Close and Dellwod Park. 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 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, the proposed 15m high monopole would appear as an overly prominent, obtrusive structure that would tower above other street furniture as well as the trees and other properties that would surround it. Located at the junction of Charlotte Close and Kidmore Road, 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.

By virtue of its height, the proposal would have a visual dominance in the verdant surrounds, out of character with the scale of structures and vegetation in the vicinity. The siting and design of

the proposal makes little attempt to minimise its visual impact, through innovative design such as concealment/camouflage 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.

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.

Amenity and Accessibility

The proposal site is a grass verge located east of Kidmore Road at the junction of Charlotte Close and Kidmore Road. The grass verge is located adjacent to the boundary fencing of Glendale house which is a two storey block of flats. 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. 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 west of the site on Kidmore 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 or reduce the footway width. 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.

Tree Matters - Siting

The proposed site lies on a grass verge on the Kidmore Road frontage of Glendale House, Charlotte Close. The site has a verdant character, along the tree-lined Kidmore Road. There are numerous trees on both sides of the Road and some of which are subject to Tree Preservation Order (TPO). Adjacent to the site are two mature trees. The application appears to be silent on the presence of trees and thus no measures to protect nearby trees have been proposed as part of this application. Without demonstration that harm would not be caused to the RPAs or as a result of pruning of these trees during the course of construction, the proposals are contrary to Policy EN14 and therefore considered harmful to those visually important trees. The proposal is therefore not acceptable and this forms the second reason for refusal.

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, unsuitable pavements or verges and anticipated build and planning issues. However, information with details of the analysis of various 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, one of the reasons for discounting a site was due to the site being in a residential, however it is unclear why the selected site was found to be the best option as it is also within a residential area and in close proximity to a lot of low rise dwelling houses including flats. 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 third reason for refusal.

Health Issues

The NPPF states that “Local planning authorities must determine applications on planning grounds. They should not seek to prevent competition between different operators, question the need for the telecommunications system, or determine health safeguards if the proposal meets International Commission guidelines for public exposure”. The supporting text to Policy OU3 states that “ICNIRP declarations should be based on the cumulative effects of electromagnetic fields emitted by other nearby base stations and antennae as well as the proposed development”.

The applicant has provided an ICNIRP certificate to support this 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

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 design, height and bulk, 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 proposal in the absence of arboricultural information has failed to demonstrate lack of harm to nearby trees of high amenity value and Trees subject to Tree Preservation Orders. This includes harmful impact on their Root Protection Areas from excavation for the foundations of the proposed structures and any pruning required to accommodate the pole. The proposals therefore are contrary to Policy EN14 of the Reading Borough Local Plan (2019) and the aims of the Reading Borough Tree Strategy.
3. 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.

I14: Pre-app Advice

This planning application was submitted without the benefit of first seeking pre-application advice from the Local Planning Authority, which can often result in the avoidance of refusal of planning permission.

I00: Plans

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

Plans and other documents considered:

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