

DELEGATED APPLICATION REPORT

Ward: Thames

App Ref: 220587/TEL

Address: St Peters Hill, Caversham, Reading

Proposals: Application for prior notification of proposed 15.0m Phase 8 Monopole C/W wraparound Cabinet at base and associated ancillary works by telecommunications code systems operators (amended description).

Case Officer: Beatrice Malama

Applicant: CK Hutchison Networks (UK) Ltd

Date received (valid from): 20 April 2022 **Target Decision date:** 15 June 2022

Site Description and Surrounding Area

The proposal site is to the rear of 12 St Peters Avenue located south-west of St Peters Hill in a predominantly residential area. The site which is on highway land is surrounded by residential dwellings. There are a few listed buildings located further south of St Peter's Hill approximately 78m from the proposed site. The site is located on the edge of St Peter's Conservation Area and within an Air Quality Management Area. The area has significant vegetation cover and the Reading Borough Tree Strategy Identifies St Peters Hill as a 'Treed Corridor'.

Proposal

The proposal seeks prior notification for the installation a 15.0m Phase 8 Monopole C/W wraparound Cabinet at base and 3 other ground based cabinets. The proposed development would be in colour.

Plans Considered

Drawing No: RDG18136_M001 Issue A - 100 Existing Site Plan
Drawing No: RDG18136_M001 Issue A - 150 Existing Elevation A
Drawing No: RDG18136_M001 Issue A - 002 Site Location Plan
Drawing No: RDG18136_M001 Issue A - 260 Proposed Elevation
Drawing No: RDG18136_M001 Issue A - 210 Proposed Site Plan
Received on 21st April 2022

Other supporting Documents

Supporting letter to the LPA/Planning Department Ref: RDG18136 - dated 14th April 2022
Letter of notification to the Highways Department Ref: RDG18136 - dated 12th April 2022
Site Specific Supplementary Information - dated 14th April 2022
Declaration of Conformity with International Commission on Non-Ionizing Radiation Protection Public Exposure Guidelines Reference No. RDG18136_M001- dated 24th January 2022
Developer's Notice Reference No. E: 470811 N: 174991 - dated 12th April 2022
Received on 21st April 2022

Relevant Planning History

None relevant to this application

Consultations

Internal:

RBC Transport - No Objection - comment received on 13 June 2022

- *All of the equipment will be sited within the grassed verge area. The proposed location of the additional equipment cabinets and pole will not impact on any visibility splays or reduce the footway width.*
- *Therefore, there are no transport objections to this proposal subject to the recommended informatives.*

RBC Natural Environment - Objection - comment received on 8 June 2022

- *There is no arboricultural information provided to demonstrate that trees will not be directly harmed, nor to confirm what pruning is likely to be required to allow installation.*
- *Given the lack of a proper tree survey and arboricultural impact assessment, the applicant has failed to demonstrate how their proposal would not be detrimental to adjacent trees both immediately and in the future.*
- ***As such the proposal is contrary to EN14 and to Reading Borough Council adopted Tree Strategy and should be refused***

RBC Ecology - No objection - comment received on 1 June 2022

- *The main habitats to be affected by the proposals are amenity grassland and a path (hardstanding) which are of low ecological value and unlikely to be used by protected species.*
- *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 Comments Received

External:

The following addresses were consulted by letter on 17th May 2022

5 Dovedale Close, Caversham, Reading, RG4 7AL
6 Dovedale Close, Caversham, Reading, RG4 7AL
11 St Peters Hill, Caversham, Reading, RG4 7AX
4 Scholars Close, Caversham, Reading, RG4 7DN
5 Scholars Close, Caversham, Reading, RG4 7DN
6 Scholars Close, Caversham, Reading, RG4 7DN
9 St Peters Hill, Caversham, Reading, RG4 7AX
7 Dovedale Close, Caversham, Reading, RG4 7AL
8 Dovedale Close, Caversham, Reading, RG4 7AL
Hill House, The Mount, Caversham, Reading, RG4 7RE

No public consultation responses have been received.

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

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 if alternative sites (where possible) have been fully investigated within the supporting documentation for this application. The proposed monopole will be assessed from two viewing angles based on the flow of vehicle traffic within the surrounding area.



Fig 1. Aerial image showing the proposed location of the antenna and two 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 St Peters Hill.
	Viewing Angle 2	The view to be appraised south east of the proposal site on St Peters Hill.

The application site is located to the west of St Peters Hill and to the rear side of 12 St Peters Avenue. The proposal would be located on a grass verge on an area designated as highways land. The proposed site lies within St Peters Conservation Area. The Reading Borough Tree Strategy has identified St Peter's Hill as a 'Treed corridor'. The proposed telecommunications equipment consists of a 15m Phase 8 Monopole C/W wrap-around Cabinet at base and 3 cabinets and would be located approximately 10m north of an existing street pole.

The submitted Site Specific Supplementary Information states that *"the proposed design has been selected to minimise visual impact upon the street scene by integrating with the existing street furniture, having similar vertical lines and overall appearance to the numerous street lighting columns in this area"*.

Whilst the Site Specific Supplementary Information document appears to refer to numerous vertical elements of street furniture including lighting columns as its justification for the siting, the Council does not agree with the applicant's claim. Although the wider street has

some street poles dotted around, there is only one lamppost in close proximity to the site, which is located approximately 10m away. Due to the siting of the monopole and its associated cabinets, it would be very visible to the users of the highway. Although the trees would provide some form of screening between the proposed development and the nearby residential properties west of the site on St Peters Avenue, this would not be the case when viewed from the north west and south east on St Peters Hill.

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 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. Furthermore, the proposed monopole and the associated cabinets are proposed to be grey and this would further make the proposed development appear out of keeping with the surrounding. It is considered that the monopole has not been sympathetically designed in order to serve its purpose. However, should the proposal otherwise have been recommended for approval, this could have been resolved by painting the equipment green to match the surrounding.

Whilst it is acknowledged that the proposed development would bring about benefits 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 St Peters Hill Conservation area and the wider street.

Due to the size, design, colour and bulk of the proposed monopole and its associated cabinets, it is considered that the proposal would be intrusive and would detract from the character and appearance of St Peters Hill Conservation area. The proposed monopole and associated cabinets are considered to have significant adverse impact on the visual amenity of the surrounding area and St Peters Hill Conservation area within which it is located contrary to Policies EN1 and OU3 of the Reading Borough Local Plan (2019). On this basis the proposal is being recommended for refusal.

Amenity and Accessibility

The proposal site is located on the west side of St Peters Hill and east of St Peters Avenue. Whilst there are residential dwellings adjacent and in close proximity to the proposal site, due to the nature of the proposed development and the trees surrounding the site which act as a form of screening, there is not considered to be harm to the living conditions to nearby residents with regards to overbearing development or any other criteria listed under policy CC8 of the Reading Borough Local Plan to the point of refusal.

In accordance with the accessibility and ease of movement aspect of policy CC7 of the Reading Borough Local Plan, the proposed development is considered to allow for appropriate movements along the adjacent pathway to the north and south of St Peters Hill. This is also confirmed by Reading Borough Council Transport that the proposed development would not compromise highway safety. Visibility splays along St Peters Hill are suitably maintained, while the proposed development will also allow for suitable pedestrian movement. This is further confirmed within the submitted Site Specific Supplementary Information which states that “the proposed equipment has been strategically located on the grass verge at St Peters Hill, there will be no impact to pedestrian flow or safety. 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 within St Peters Conservation Area. The Reading Borough Tree Strategy identifies conservation areas as priority areas for tree retention and planting. In addition, St Peter's Hill has been identified as a 'Treed corridor' as such any proposal must not have any direct harm on adjacent trees, that no future pressure to prune would arise from the proposal and that the visual impact is acceptable. Whilst it is acknowledged within the Site Specific Supplementary Information document and on the proposed elevations that there is a large amount of tall trees and shrubs surrounding the site, there is no information indicating that the trees would be protected from harm. The Natural Environment officer has pointed out that no arboricultural information has been provided as part of this application to demonstrate that trees will not be directly harmed, nor to confirm what pruning is likely to be required to allow installation. Given the lack of a proper tree survey and arboricultural impact assessment, the proposal has failed to demonstrate that there would not be detrimental impact on adjacent trees both immediately and in the future. As such the proposal is contrary to Policies CC7 and EN14 of the Reading Borough Local Plan 2019 and to Reading Borough Council adopted Tree Strategy. Therefore, 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.

The Site Specific Supplementary Information document shows that 11 options were discounted for various reasons including proximity to residential properties, insufficient pavement width, location within a conservation area, constructed overhead cables, etc. However, it is difficult to determine whether alternative sites have been robustly considered and discounted. Whilst the applicant has stressed that the search area is extremely constrained, it is not clear how far the search area extends as this information has not been provided. The applicant has only provided a very limited assessment of alternative sites with no detailed supporting evidence in respect of each site. For example a detailed analysis of each site including plans illustrating reasons for discounting each site would have been provided as evidence. Due to insufficient information provided to support the choice of the site and the reasons for discounting alternative sites, it is difficult to assess whether this is the only option available 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 planning application. This certifies that the proposed development 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.

Air Quality

This proposal has been considered against Reading Borough Local Plan policy EN15, as the proposal site is within an Air Quality Management Area (AQMA). As demonstrated in the policy, this proposal does not meet the requirements for an Air Quality Assessment (AQA) and is considered not enough of a detrimental impact air quality to warrant such an assessment due to the size and scale of the proposal.

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 development, by reason of its siting, has failed to demonstrate that it would not detrimentally impact on nearby highway trees through direct harm to the root systems or by future pruning requirements to maintain network coverage, contrary to Policies CC7 and EN14 of the Reading Borough Local Plan (Adopted November 2019).
2. The proposed 15m high monopole and its associated cabinets, by reason of its size, design, colour and bulk, would detract from the appearance of the designated St Peters Conservation area and the immediate surrounding, contrary to Policies EN1 and OU3 of the Reading Borough Local Plan (Adopted November 2019).
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 agreed extended timescale 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 Considered:

Drawing No: RDG18136_M001 Issue A - 100 Existing Site Plan
Drawing No: RDG18136_M001 Issue A - 150 Existing Elevation A
Drawing No: RDG18136_M001 Issue A - 002 Site Location Plan
Drawing No: RDG18136_M001 Issue A - 260 Proposed Elevation
Drawing No: RDG18136_M001 Issue A - 210 Proposed Site Plan
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