

DELEGATED HOUSEHOLDER APPLICATION REPORT

Ward: Caversham

App Ref: 221279/TEL

Address: Grass Verge Outside, 94 Chiltern Road, Caversham, Reading, RG4 5JD

Proposals: Application for prior notification of proposed telecommunications base station installation

Case Officer: Beatrice Malama

Applicant: MBNL, on behalf of Three UK Ltd

Date received: 30 August 2022

Valid from: 8 September 2022 **Target Decision date:** 3rd November 2022

1. SITE DESCRIPTION AND SURROUNDING AREA

Chiltern Road is considered an access road to a predominantly suburban part of Caversham, serving access to cul-de-sacs such as Cawsam Gardens, Ragland Gardens, as well as Valentine Crescent. The surrounding area is characterised as residential, consisting of similarly designed two-storey semi-detached dwellings. The proposal site is also in close proximity to Henley Road allotments, The Hill Primary School, and Reading Cemetery & Crematorium.

2. PROPOSAL AND SUPPORTING INFORMATION

The proposal seeks for prior notification of proposed development by telecommunications code systems operators for the installation of an 18 metre high monopole supporting 6 no. antennas with a wraparound equipment cabinet at the base of the column, 3 no. new equipment cabinets and ancillary development thereto upon a grass verge at Chiltern Road.

Plans/Documents Considered

- Drawing No: 1185859_RDG079_10900_RG4655_M002_REV B - 002 Site Location Plan
- Location Map - Eastern Grass Verge Outside 94 Chiltern Road, Reading, Berkshire.RG4 5JD (N.G.R E: 472,210 N: 175,695)
- Typical design and size of proposed streetworks monopole
- Pre-consultation letter to The Chief Planning Officer dated 15th July 2022
- Cllr Pre-consultation letters dated 15th July 2022
- Letter dated 23rd August - Clarification of The Declaration of ICNIRP Compliance Issued
- Developer's Notice to Chief Planning Officer dated 23rd August 2022
- Developer's Notice to Highways Department dated 23rd August 2022
- Allaying health concerns regarding 5G and exposure to radio waves - an IET guide for policy makers- and local planning authorities (2nd edition)
- A Councillor's Guide to Digital Connectivity by Local Government Association
- Site Specific Supplementary Information reference RDG079

Received by the Local Planning Authority on 30th August 2022

Drawing No: 1185859_RDG079_10900_RG4655_M002_REV B - 100 Existing Site Plan

Drawing No: 1185859_RDG079_10900_RG4655_M002_REV B - 150 Existing Elevation A

Drawing No: 1185859_RDG079_10900_RG4655_M002_REV B - 200 Existing Site Plan

Drawing No: 1185859_RDG079_10900_RG4655_M002_REV B - 250 Proposed Shared Elevation A

Drawing No: 1185859_RDG079_10900_RG4655_M002_REV B - 251 Proposed Elevation (Planning)

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Drawing No: 1185859_RDG079_10900_RG4655_M002_REV B- 452 Visibility Splays

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3. RELEVANT PLANNING HISTORY

011321 - Erection of 1 x 8m stand-alone steel telecommunications telegraph pole, mounted antenna and street cabinet - Prior Approval Notification - Approved on 07/09/2001

990648 - Erection of free-standing telegraph pole 8m in height with 3 directional antenna - Application Refused on 05/01/2001

200801/TEL - Application for prior notification of proposed development by telecommunications code systems operators for the installation of a 20 metre phase 8 pole with wrap around cabinet built around the base, 3no. new equipment cabinets and ancillary development thereto - Application Refused - 5/ 8/2020

4. CONSULTATIONS

Internal Consultation -Transport Development Control comment received on 16th September 2022 as follows:

“The current proposal adds additional multiple cabinets to the verge and a 20m 5G monopole with ground based cabinets. All of the equipment will be located on highway land. The proposed location of the additional equipment cabinets and pole will not obstruct pedestrian movement given that the equipment will be located on the verge. However, it is not clear from the plans whether the siting of the large cabinets will impact visibility of vehicles exiting the private road (to the allotments).

Therefore, can the applicant ensure that visibility splays are included on the proposed site plans to ensure that visibility splays to the right from the private road are maintained. Visibility splays of 2.4m by 43m are requested. No obstructions above the height of 0.6m should fall within the visibility triangle.”

Plans illustrating visibility splays were submitted to and received by the Local Planning Authority on 30th September 2022 and no further transport objections were received. Below is the final comment received from Transport.

“The attached plan illustrates that the proposed infrastructure would be outside of the visibility splay at the adjacent access and as such would not represent an objection in Highways terms.”

Ward Members - A letter of representation was received from Cllr Matt Yeo raising concerns about the impact of the proposal on visual amenity.

A letter of objection was received from the MP, Matt Rodda and the reason for objecting is that the proposal would cause a significant visual impact in a residential area.

Public Consultation

Nearby residents were consulted by letter and seventeen objections have been received. A summary is as follows:

- Harm to visual amenity
- Alternative sites not considered
- Devalue nearby property
- Radiation harmful to children
- Immediate benefits to local residents unclear

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 6/8/20).

The proposed mast and associated equipment complies with Part 16, Class A.1 and Class A.7 of The Town and Country Planning (General Permitted Development) Order 2015 as amended in November 2016 as the mast would not exceed (excluding antenna) 20 metres in height on land which is on a highway as required by A.1 (1) and the proposed cabinets would not be greater than 1.5 sqm for each structure as required by A.1 (7) of The Town and Country Planning (General Permitted Development) (England) (Amendment) (No. 2) Order 2016.

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



Fig 1. 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	The view to be appraised looking south east along Chiltern Road.
	Viewing Angle 2	The view to be appraised heading north west along Chiltern Road.
	Viewing Angle 3	The view to be appraised looking at the proposal site facing east.

The proposed development includes the erection of an 18m monopole approximately 3.6m south east of the existing 8m monopole on site. The 18m monopole has a maximum width of 0.50m and, by contrast, the existing 8m monopole on site has a maximum width of 0.22m, while the

antenna has a width of 0.22m. It has been specified in the application that the existing 8m monopole is to be removed.

Three additional equipment cabinets have also been proposed on site; one to the north west of the proposal site, the other two to the south east of the proposal site next to the proposed 18m monopole. The largest equipment cabinet has a height of 1.75m and occupies an area of 1.25m². There are four existing cabinets on site, all of which are to be retained. Overall, the proposal site includes seven cabinets and an 18m high monopole.

The existing 8m monopole is just visible from the top of Chiltern Road, looking south east (viewing angle 1). At first glance, the existing 8m monopole could be mistaken for a streetlight. The overall proposal site is highly visible from this view. The proposed additional equipment cabinets and existing cabinets would appear intrusive from this angle.

Given the size and height of the existing 8m monopole, it does not dominate the skyline or views along Chiltern Road. The proposed 18m monopole is over double the height of the existing 8m monopole and is more than double the width of the existing monopole. It is considered that the size and scale of the proposed monopole is such that it would look significantly out of place given the suburban character and appearance of the surrounding area.

The combination of the existing and proposed equipment cabinets would be clearly visible looking North West (Viewing Angle 2) along Chiltern Road. At ground level the proposed cabinets are considered to add to the increase street clutter along the grass verge. The size of the proposed 3UK Bowler Equipment cabinet is considered very large at a height of 1.75m and a width of 1.9m given the character and appearance of the street scene. It is considered that the scale and colour of the existing and proposed cabinets would appear out of place given the nearby context of the verdant backdrop of hedging and a tree.

The proposed 18m monopole would appear prominent when viewed from either Viewing Angle 1 or 2. However, because of the lower elevation, it would be more dominant within the skyline from Viewing Angle 2. 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 built environment of the surrounding area is predominately two storey dwelling houses with a maximum height of approximately 8m. The existing 8m monopole is not viewable from afar, because it respects the height of the built environment of the surrounding area. It is considered that an 18m monopole would have a significantly greater, and detrimental impact on the skyline when viewed along Chiltern Road from afar, compared to the existing monopole.

It is considered that the cumulative impact of all aspects of the development contributes to the officer view that the siting and appearance of the proposed development is not acceptable. This is in relation to the amount of cabinets proposed and retained on site, the size and location of the proposed cabinets, and the additional 18m monopole and associated cabinet.

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.

Amenity and Accessibility

The proposal site is a grass verge located to the frontage of 94 Chiltern Road which is a two storey semi-detached dwelling house. The immediate surrounding area is characterised by two storey dwelling houses. Although the proposed monopole would be approximately twice the height of any nearby buildings, street poles or trees and in close proximity to residential properties, this is not considered to adversely impact the living conditions of nearby residents.

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 obstruct pedestrian movement given that the equipment will be located on the verge. In addition, the proposed plan illustrates that the proposed infrastructure would be outside of the visibility splay at the adjacent access and as such would not represent an objection in Highways terms. 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.

Alternative Sites

The applicant has stated within the submitted Site Specific Supplementary Information as follows:

“As the proposed scheme seeks to upgrade the existing infrastructure by replacing the existing monopole with a new one, there is no need for alternative locations to be considered. This is primarily because, the scheme seeks to add upgrade technologies at the already established cell area as opposed to creating a new site”.

Whilst the proposed 18m monopole would replace the existing 8m monopole, in this instance a search for alternative sites is considered necessary as this is not a like for like replacement. Given that no information has been 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.

In addition, the Mobile Telecommunications and Health Research Programme (MTHR) concluded 11 years of research into mobile phones and health issues with their report of 2012. This determined that there was no association between exposure to mobile phones, or base stations, and an increased risk of developing cancer.

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 of the proposed monopole and associated cabinets is not considered acceptable given the suburban setting of the surrounding area. The proposed additional cabinets are considered to add to the existing clutter at the proposal site. The proposed 18m monopole, associated cabinets and the retention of existing cabinets is considered not to respect the visual amenity 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

Reasons for refusal:

1. The proposed 18m high monopole and associated equipment, by reason of its design, height and bulk, would detract from 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).
2. 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 (2019).

Informatives:

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.