

DELEGATED APPLICATION REPORT

Ward: Peppard

App Ref: 220638/TEL

Address: Grove Road, Emmer Green, Reading

Proposals: Application for prior notification of proposed 'slim line' phase 8 monopole c/w wraparound cabinet at base, 3no. additional ancillary equipment cabinets and associated ancillary works by telecommunications code systems operators (amended description).

Case Officer: Beatrice Malama

Applicant: Hutchison CK Network UK Ltd

Date received (valid from): 29 April 2022 **Target Decision date:** 24 June 2022

Site Description and Surrounding Area

The proposal site is land located at the junction of Grove Road and Kidmore End Road. The site which is on highway land is surrounded by residential and commercial properties and a number of traditional old buildings. Located North West of the site is Emmer Green Recreation Ground. Within the site's immediate surrounding are various types of street furniture including overhead power line poles. The site does not fall within a conservation area.

Proposal

Prior approval is being sought for the installation of a 'slim line' 15m high phase 8 monopole c/w wraparound cabinet at base, 3no. additional ancillary equipment cabinets and associated ancillary works by telecommunications code systems operators. The pole would have a minimum radius 0.3m with the antennas measures approximately 0.86m.

Plans and Documents Considered:

Drawing No: RDG20101_TBC_TBC_RG6851_GA_REV A - 150 Existing Site Elevation

Drawing No: RDG20101_TBC_TBC_RG6851_GA_REV A - 100 Existing Site Plan

Drawing No: RDG20101_TBC_TBC_RG6851_GA_REV A - 002 Site Location Plan

Drawing No: RDG20101_TBC_TBC_RG6851_GA_REV A - 005 Crane Location and Visual Splay Plan

Drawing No: RDG20101_TBC_TBC_RG6851_GA_REV A - 006 Underground Services Plan

Drawing No: RDG20101_TBC_TBC_RG6851_GA_REV A - 265 Proposed Site Elevation

Drawing No: RDG20101_TBC_TBC_RG6851_GA_REV A - 215 Proposed Site Plan

RDG20101_TBC_TBC_RG6851_GA_REV A - 304 Proposed Configuration Antenna Schedule

RDG20101_TBC_TBC_RG6851_GA_REV A - 307 Equipment Schedules and Dependencies

Site Specific Supplementary Information

Received by the Local Planning Authority on 29 April 2022

Relevant Planning History

No relevant history

Consultations

Internal:

RBC Transport - No Objection - comment received on 14 June 2022

- *All of the equipment will be sited within the grassed verge area on highway land. 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.*

Ward Members - No Comments Received

External:

Letters of consultation were sent on 17/05/22 to the owners and occupiers of properties located within the site's immediate surrounding area. 40 objections which were received have been summarised as follows:

- Due to the height of the mast and bulk of street cabinets and the chosen location (within the heart of the village), it would be overbearing and would have an adverse impact on the visual amenity of the village centre and the nearby Victorian and older properties and townscape.
- There has been no use of innovative design, siting nor attempt to camouflage the mast to minimise visual impact
- This will be a blot on the corner of the road and the park
- The application does not show what alternatives were looked at and dismissed.
- 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.
- Site sharing options have also not been investigated fully.
- Alternative site names are not recognisable in the area
- Located too close to houses and other busy social and recreational facilities as such there are health concerns due to harmful radio wave emissions
- 15m mast too high for this kind of location, would be visually intrusive and out of keeping with the surrounding area.
- Consider alternative sites such as on top of the building or near existing trees where it would be less intrusive. Or two smaller masts instead.
- Harmful impact on the nearby busy playground (the only green space left in the area) and children's play park.
- The proposed mast would erode the quality of the green space. This area is the only area left of the old Emmer Green, and a large mast would completely ruin the historic feel of the old centre of the 'village'.
- The proposed mast is not permitted by Local Plan Policy EN7, Policy OU3 or Policy CC7 and should be refused.
- The mast is not required in the area as mobile signals are already very good
- This would reduce the value of homes in the area
- Natural light will be blocked
- Would create a blind spot which would be a risk to motorists
- Highly visible and obstructive to people walking and cycling along the path and grass verge.
- At one time the grassy triangle was part of the recreation area, which has historic 'village green' status.
- Community efforts to replace the hedge and make the area more enjoyable would be wasted by the installation of the proposed mast.
- There is a network of gas pipes under the grassy triangle - I have seen them when the area is dug up.
- The technical justification both regarding the need for the mast and its location have not been substantiated.

- The location proposed is adjacent to a recreation ground especially frequented by young children and constitutes a health hazard. Moreover, there is a primary school and a facility for preschool children in the area within walking distance of the mast.
- The mast could become an earthing point in the event of lightening and so constitute a risk to pedestrians on the adjacent path.
- There is a large gas main at this point which will create an explosion hazard during construction and forever after with electrical equipment really close to the gas main.
- This will be a complete eye saw and damage the local environment.

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 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 End Road.
	Viewing Angle 2	The view to be appraised south east of the proposal site on Kidmore End Road.
	Viewing Angle 3	The view to be appraised west of the proposal site on Grove Road.

The application site is land located to the north of Grove Road at the junction of Grove Road and Kidmore End Road. The proposal would be located on a grass verge on an area designated as highways land. Within the site's immediate surrounding are a number of street poles including overhead power line poles. There is an existing pathway way around the site and beyond the path on the north western side is Emmer Green Recreation Ground. Due its

location, the site is very visible from the North West and south east on Kidmore End Road and from the west on Grove Road.

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 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*”.

Whilst the statement appears to indicate that the proposed development has been designed so as to minimise the visual impact on the street scene, the Council does not agree with the above claim. Although there a number of existing street poles within the immediate surrounding of the site, due to its design and size, the proposed mast and its associated cabinets appear to be out of keeping with the immediate surrounding and the wider street. The proposed mast is 15m high and would be higher than any existing street structures and buildings. Given the design, height and bulk of the proposed 15m high monopole and its associated cabinets, it would appear as an overly prominent, obtrusive feature which would contrast unsympathetically with the existing open and undeveloped character of the street corner and open space beyond. This is also acknowledged within the Site Specific Supplementary Information which has stated that “*there will be a localised visual increase through the installation of additional apparatus*”. Further it would appear as an alien and uncharacteristic feature in the context of the traditional buildings around the site.

Whilst the applicant has acknowledged that the proposed telecommunications equipment would result in a localised visual increase, it is not clear if any attempts to make the proposed development less visually intrusive such as through the use of a more sympathetic design and colour 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.

Although, 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 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 north of Grove Road at the Junction of Grove Road and Kidmore End Road. There is an existing pathway around the grass verge. Whilst there are residential dwellings in close proximity to the proposal site, due to the nature of the proposed development and the separation distance between the site and the nearest residential property, 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 (2019) 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 west of the site from Grove Road to Kidmore End 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 highway land. Adjacent to the site on the western side is a pathway and beyond which is a hedge that forms part of the fencing for Emmer Green recreation ground. Within the boundary of the recreation ground are a number of trees with the closest being approximately 20m from the site. Due to the distance between the site and the nearest trees and the sizes of the trees, it is considered unlikely that the proposed development would cause harm to the trees. In addition, a comment received from the Natural Environment Officer on 30th May 2022 has indicated that whilst the proposed site was chosen as a potential tree planting site for the 2022/23 planting season, this has not been confirmed yet. Furthermore, the adjacent park is considered a possible alternative site for tree planting. In view of this, the proposed development is not considered to have harmful impact on the current or future trees as such the proposal complies with Policy CC7 of the Reading Borough Local Plan 2019 and to Reading Borough Council adopted Tree Strategy.

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 indicates that 4 other options were discounted for various reasons including proximity to residential properties, insufficient pavement width, proximity to existing overhead power line cables and visibility issues. However, it is difficult to determine whether alternative sites and options such as site sharing and use of existing structures within the area have been robustly considered and discounted. In addition, 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. Furthermore, some of the mentioned street names do not appear to be within the identified search area making it more difficult to determine whether a thorough research and assessment was conducted prior to making this application. 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 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 second 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”.

Whilst an ICNIRP declaration form has been submitted, it is not valid as the drawing number indicated on the form does not correlate with submitted plans. The information provided has failed to demonstrate that the proposed development would be in full compliance with the requirements of the radio frequency (RF) public exposure guidelines of ICNIRP. Without this information, it is difficult to determine the level of exposure of the general public to electromagnetic fields from the proposed mast alone and cumulatively from other nearby base stations and antennas. Given there are existing residential properties and other public places in close proximity to the site, it is very vital that this information is provided in order to assess the proposed development would be safe for the general public.

The applicant has failed to demonstrate that there would be no health risks associated with this development given its location and the existing uses within the site’s immediate surrounding. Without any assurance that the proposed development would not independently and/or cumulatively pose any health risks to the general public, particularly those residing close to the site, it is difficult to determine if the selected site is suitable for this purpose as it is very close to residential properties and other busy public places. As such, it is considered that the possible health implications of such apparatus are considered sufficient reason to refuse prior approval. This therefore forms the third reason for refusal.

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 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).

3. The proposal in the absence of a valid ICNIRP certificate has failed to meet International Commission guidelines for public exposure. Further the proposal has failed to demonstrate that the proposal would not have a detrimental impact on the health of the general public, contrary to Policy OU3 of the Reading Borough Local Plan (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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