

DELEGATED REPORT

Application No: 211542/TEL

Address: Land at Pepper Lane

Proposal: Installation of 18m monopole and ancillary equipment

Case Officer: Tom Hughes

Site Description and Surrounding Area

The application site comprises a grass verge on an inside bend to the southern side of Pepper Lane. Immediately adjacent to the site is a single storey building, part of Leighton Park School, with the prominent Peckover Hall behind. This part of Pepper Lane has a verdant, tree-lined character. Several trees adjacent to the site, on the Pepper Lane boundary of Leighton Park School, are subject to TPO's. The Grade II listed Blandford Lodge, within the University of Reading's Whiteknights Campus, is located approximately 50m to the north of the site.

Proposal

The application seeks prior approval under Class A, Part 16, Schedule 2 of the General Permitted Development Order 2015 (as amended) for the erection of a 18m monopole and ancillary equipment.

The following information was supplied, received 16/09/21:

Supporting Letter

Site Specific Supplementary Information

Developers Notice, dated 11/09/21

Consultation Letter

Declaration of Conformity with International Commission on Non-Ionizing Radiation Protection Public Exposure Guidelines, dated 08/09/21

Drawing No: RGG19219_M001 Rev. A 002 - Site Location

Drawing No: RGG19219_M001 Rev. A 100 - Existing Site Plan

Drawing No: RGG19219_M001 Rev. A 210 - Proposed Site Plan

Drawing No: RGG19219_M001 Rev. A 150 - Existing Elevation

Drawing No: RGG19219_M001 Rev. A 260 - Proposed Elevation

Relevant Policies

Class A, Part 16, Schedule 2 of The Town and Country Planning (General Permitted Development) Order 2015 (as amended)

National Planning Policy Framework

Chapter 10 (Supporting high quality communications)

Reading Borough Local Plan 2019

Policy CC7 (Design and the Public Realm)

Policy EN1 (Protection and Enhancement of the Historic Environment)

Policy EN4 (Locally Important Heritage Assets)

Policy EN6 (New Development in a Historic Context)

Policy EN14 (Trees, Hedges and Woodlands)

Policy TR3 (Access, Traffic and Highway-Related Matters)

Consultations

RBC Transport

No objection. The proposals would not impact on any visibility splays or obstruct pedestrian movements.

RBC Natural Environment

The installation of the equipment itself would not have any direct impact on nearby trees, however it is necessary for the applicant to provide the intended route of services to the new equipment given the presence of multiple TPO trees on the Pepper Lane boundary of Leighton Park School. This is required to demonstrate whether RPAs of protected trees will be affected. There should be no expectation that pruning of protected trees will be allowed in the future as a result of the siting of the equipment.

RBC Ecology

No objection.

A site notice was displayed by the case officer. One representation was received, with regard to the following:

- The proposal would have a significant visual impact on the surrounding area, highly prominent and visible from within Leighton Park School due to its insensitive location
- The proposal would be significantly taller than surrounding buildings, trees and street furniture, detracting from the visual amenity of the area and dominating the outlook from within Leighton Park School
- No justification for height of proposal provided
- No detail provided on the impact of the proposal on adjacent protected trees
- Poor consultation on proposals with Leighton Park School
- Lack of consideration of other suitable sites
- Lack of consideration of impact of proposals on nearby heritage assets

Relevant Planning History

None.

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.

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.

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.

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.

Siting and Appearance

In addition to Policy OU3 above Policy CC7 requires development to maintain or enhance the character of the surrounding area. Policies EN1, EN4 and EN6 require that historic features, including their settings, will be protected. Policy TR3 seeks that development does not adversely impact on the highway network and Policy EN14 seeks to protect existing trees from damage or removal.

The proposed 18m high monopole and ancillary equipment would be located within a grass verge on the southern side of Pepper Lane. The proposed equipment is required in order to assist with meeting the Government's aims to roll out 5G technology and the applicant has confirmed that 18m is the minimum height required for the monopole in order to support 5G.

The site has a verdant character, along the tree-lined Pepper Lane. The adjacent single storey building, part of Leighton Park School is approximately 6m in height. Adjacent trees are approximately 8m in height. Nearby lampposts are approximately 4m in height. The proposed monopole would comfortably exceed these heights, and would be clearly visible in both directions along Pepper Lane. Projecting well above existing canopies, the monopole would also be visible from within Leighton Park School and the Whiteknights Campus. The visual impact of the monopole would be exacerbated by it being viewed in the narrow context of the single carriageway road, where its height would be much more pronounced.

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. Located

approximately 50m from the Grade II listed Blandford Lodge, the proposal would also have an impact of the setting of this heritage asset. No reference has been made to the heritage asset within the submission. It is considered that visual harm would be caused to the heritage asset by virtue of the height and design of the monopole. With no consideration given to the significance of the heritage asset, the proposal is directly contrary to Policy OU3. The siting and design of the proposal makes little attempt to minimise its visual impact, through innovative design such as lamp column 'swap out' or concealment/camouflage options. The benefits of the monopole in terms of meeting the aims of the NPPF to roll out 5G technology are not considered to outweigh the visual impacts on the surrounding area.

Several trees subject to TPOs are located adjacent to the site. Without demonstration that harm would not be caused to the RPAs of these trees during the course of construction, the proposals are contrary to Policy EN14.

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.

Alternative sites were presented within the supplementary information provided for this application. A limited explanation was provided for each site as to why these were discounted options. The applicant states that there is no scope to upgrade an existing mast nor site share.

The application has been assessed in the first instance to determine the suitability of the siting and appearance of the monopole and cabinets proposed within this location. As above, the siting and design of the proposal is not considered to be acceptable. Due to the limited information provided, it is not considered that alternative sites have been fully explored. Indeed, there are several large buildings within the Whiteknights Campus which are deemed suitable for rooftop provision.

Transport

All of the equipment will be located on highway land, but its location will not impact on any visibility splays at the junction or obstruct pedestrian movement. The apparatus is also not considered to give rise to cause any inappropriate distraction to passing motorists. Transport officers raise no objection to the siting or appearance of the equipment which is not considered to have any adverse highway impacts.

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

For the reasons outlined in this report, namely the scale and height of the proposal and the impact on nearby trees of amenity value, the proposal is not considered to be acceptable in terms of local and national policy.

RECOMMENDATION

PRIOR APPROVAL REFUSED