

DELEGATED APPLICATION REPORT

Application No: 210597/TEL

Address: Site Adjacent to 287 Oxford Road, Reading, RG30 1AU

Proposal: Application for prior notification of proposed development by telecommunications code systems operators for the erection of a 15m monopole with ground-based cabinets and ancillary development.

Case Officer: David Brett

Applicant: Hutchison UK Ltd

Received on: 16/04/2021

Valid on: 16/04/2021

Target Date: 11/06/2021

Site Description and Surrounding Area

The application site sits on the southern side of Oxford Road, nearby McDonald's and Reading West train station. The north side of Oxford Road consists of mostly terraced residential dwellings and convenience shops. TPO street trees are adjacent to the proposed site. The application site is not listed nor in a conservation area, however it does lay adjacent to the recently extended Castle Hill/Russell Street/Oxford Road Conservation Area.



Fig 1. Proposed siting of monopole and associated cabinets.

Proposal

The proposal seeks prior notification of proposed development by telecommunications code systems operators. The proposal includes the erection of a 15m monopole with ground-based cabinets and ancillary development.

Plans/Documents Considered

The submission comprised the following plans and supporting information:

- 002 SITE LOCATION PLAN - RDG11079_M002 Issue B
- 150 EXISTING ELEVATION A - RDG11079_M002 Issue B
- 100 EXISTING SITE PLAN - RDG11079_M002 Issue B
- 210 PROPOSED H3G SITE PLAN - RDG11079_M002 Issue B
- 260 PROPOSED H3G ELEVATION - RDG11079_M002 Issue B
- 303 PROPOSED H3G ANTENNA SCHEDULE & LINE CONFIGURATION - RDG11079_M002 Issue B
- 305 EQUIPMENT SCHEDULE & SUPPORT STRUCTURE DETAILS - RDG11079_M002 Issue B
- Declaration of Conformity with International Commission on Non-Ionizing Radiation Protection Public Exposure Guidelines
- Site Specific Supplementary Information - RDG11079

Received on 16/04/2021

Relevant Planning History

010747/TEL - Installation of a streetworks telecommunications installation with ancillary equipment - Application Permitted

200937/TEL - Application for prior notification of proposed development by telecommunications code systems operators for the installation of a 15m monopole with 3 ancillary cabinets - Application Refused on 11/09/2020. Reasons for refusal:

1. The proposed 15m high monopole, would, by reason of its height 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. In the absence of sufficient detail on potential alternative sites for the development, it could not be assessed as to whether this proposed location would be most suitable in terms of siting, contrary to Policy OU3 of the Reading Borough Local Plan (2019).
3. The proposed development, by reason of its siting, has failed to demonstrate that it would not detrimentally impact nearby highway trees, contrary to Policies CC7 and EN14 of the Reading Borough Local Plan (2019).
4. The proposed development has failed to demonstrate would be in full compliance with the requirements of the radio frequency (RF) public exposure guidelines of ICNIRP (International Commission on Non-Ionizing Radiation Protection) and as such the health implications of the development cannot be assessed, with respect to its specific siting, contrary to Policy EN16 of the Reading Borough Local Plan (2019)

Internal Consultations

Trees - Response received on 19/05/2021

- I can't see what is different between this and the previous, refused application (200937) hence objections still stand.
- I cannot see that this application resolves the concerns and no Tree Survey or Arb Method Statement has been provided nor have the trees (still) been plotted accurately, whilst at the same time the application submission acknowledge previous reasons for refusal and states:
 - *This application robustly addresses these concerns as it reinforces the fact that the minimum height of 15m is not unsuitable in terms of siting whilst also emphasising no expected detrimental impact to nearby highway trees.*
 - *The proposed location benefits from existing tall, mature trees and street furniture (e.g. street lights) which provide screening, helping the proposed equipment to blend into the surrounding area. Additionally, the proposed location is situated on a wide pavement. This means that, after construction*

of the proposed equipment, the retained pavement width will be more than sufficient to facilitate the free-flow of pedestrians within this area.

- The siting raises concern (as it did before) both over the potential harm to root systems from the installations of the pole, cabinet and electricity supply installations and the need to prune the trees for installation but more importantly in the future to maintain the signal. The 5G signal is blocked by tree foliage hence it is important to site new equipment in a location to avoid future conflict - the pole is proposed at 15m high which a mature Plane tree (which are those protected) will easily surpass.
- In conclusion, I object to siting due to failure to demonstrate harm to adjacent high amenity value trees and I would direct you and the applicant to comments made for 200937 as well.

Environmental Protection - Response received on 04/05/2021

- Applications which include noise generating plant when there are nearby noise sensitive receptors should be accompanied by an acoustic assessment carried out in accordance with BS4142:2014 methodology. It is likely that this development will include noisy mechanical plant such as air conditioning, kitchen extraction, generator, externally ventilated plant room.
- The noise assessment needs to establish the predicted noise rating level taking account of any characteristic factors like tonality or impulsiveness of the noise. The rating level should be compared with the background noise level.

Transport -response received on 07/05/2021

- All of the equipment will be located on highway land. However, the proposed location of the additional equipment cabinets and pole will not impact on any visibility splays at the junction or obstruct pedestrian movement given that the footway is approximately 4m wide in this location.
- Therefore, there are no transport objections to this proposal subject to the following informatives.

External Consultees

200 Oxford Road, Reading, RG30 1AB
200a Oxford Road, Reading, RG30 1AB
200b Oxford Road, Reading, RG30 1AB
200c Oxford Road, Reading, RG30 1AB
202 Oxford Road, Reading, RG30 1AB
202a Oxford Road, Reading, RG30 1AB
204 Oxford Road, Reading, RG30 1AB
Flat 1, 204 Oxford Road, Reading, RG30 1AB
Flat 2, 204 Oxford Road, Reading, RG30 1AB
287 Oxford Road, Reading, RG30 1AS

A site notice was erected for a period of 21 days on Tuesday 27th April 2021, expiring on Tuesday 18th May 2021.

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

Part 16 of the General Permitted Development Order 2015 (as amended by Statutory Instrument 2016 No. 1040)

National Planning Policy Framework (NPPF) (Feb 2019)

- Section 10 - Supporting high quality communications

Reading Borough Local Plan (November 2019)

- CC7: Design and the Public Realm
- CC8: Safeguarding Amenity
- EN14: Trees, Hedges and Woodland
- EN15: Air Quality
- EN17: Noise Generating Equipment
- TR3: Access, Traffic and Highway-Related Matters
- OU3: Telecommunications Development

Other relevant documents

Reading Tree Strategy (Adopted March 2021)

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. The LPA confirmed to the applicant on 20/05/2021 that prior approval would be required. 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 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 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.

Appearance and Visual Impact



Fig 2. 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 east of the proposal site.
	Viewing Angle 2	The view to be appraised west of the proposal site.

The proposed location for the 15m monopole and associated ground level cabinets is along Oxford Road. The monopole and associated cabinets proposed are identical in terms of size, scale, appearance and location to those refused under prior approval application 200937.

Oxford Road is considered a main road that links the centre of Reading to the western parts of the borough such as Norcot and Tilehurst. The section of Oxford Road upon which the proposed development is to take place is considered a mix of residential and retail uses. The proposal site is within 100m of Reading West Train Station.



Fig 3. Viewing Angle 1, The view to be appraised east of the proposal site. Site photo taken by Case Officer on 21/04/2021.

From angle 1, the proposed monopole would be greatly in excess of the height of the street trees. Although the trees would go some way to disguise sections of the pole, it would not shield the equipment in its entirety. As such, it is considered that the monopole would appear intrusive against the vegetation by way of its height, and thus appear visually jarring, at least until the trees grow in height. As discussed later in this report; this application has not provided sufficient evidence to demonstrate the long-term impact that this development would have on the nearby trees, hence it is not considered that the monopole would be appropriately camouflaged by the nearby trees in the long term.



Fig 4. Viewing Angle 2, The view to be appraised east of the proposal site. Site photo taken by Case Officer on 21/04/2021.

The prominence of the monopole is considered to be less from this angle due to the street trees, however, this is dependent on the season and the health of the deciduous trees to provide coverage.

It is considered, by particular virtue of its height in relation to the composition of the surrounding area, which comprises of residential, that the proposed development is unacceptable with respect to siting and appearance. This proposal would result in a structure that is substantially higher than nearby trees which are claimed to suitably camouflage the 15m monopole.

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, due to the jarring visual impact that the proposed monopole would have above the canopy of the adjacent TPO trees.

Tree Matters - Siting

The Site Specific Supplementary Information submitted for this application states that this application emphasises that there is no expected detrimental impact to nearby highway trees. A Tree Survey or Arboricultural Method Statement have not been provided to support these claims, nor has further information been supplied within the plans or in the form of supplementary information. Therefore, it is considered that the application has not suitably addressed Natural Environment concerns that were raised for previous application 200937.

The Reading Borough Council Natural Environment Officer confirmed that the comments submitted for application 200937 still apply for application 210597 (see section above).

The proposed new monopole and ancillary equipment are likely to be within the rooting areas of trees on site and could potentially cause damage to tree roots during their installation. No information has been provided to demonstrate how the structures will be installed without causing significant damage to tree roots through trenching, root severance, compaction etc. There is also concern over the sustainability of this site in the long term being as it is located in an area surrounded by trees. The trees are early-mature trees currently under 10m high. Plane trees can reach well over 15m when mature which would be taller than the proposed monopole and is likely to put pressure for the trees to be reduced and cut back as they reach their full height potential.

It is considered likely that the development proposed would likely cause harm to the adjacent protected trees. The trees are visible in far reaching views on the approach along Oxford Road which is also designated a 'Treed corridor' within the Borough's adopted Tree Strategy 2021. The Borough Council seeks to preserve and enhance the trees in areas with limited tree cover and along these designated 'Treed Corridors' with a commitment to protect the existing trees. The proposed development represents a potential pressure for pruning works or to reduce their height in order to prevent them from impacting on the functioning of the telecommunications equipment.

As such, in the absence of information to the contrary, the proposal is not considered acceptable in relation to Policy EN14 of the Reading Borough Local Plan (2019) or the Reading Tree Strategy (2021).

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.

Seven alternative sites were presented within the supplementary information provided for this application. These locations were presented on an aerial photograph along with the location of the development proposed within this application. A one sentence explanation was provided for each site as to why these were discounted options. Notably, option D6 along Tilehurst Road was discounted under this application due to its proximity to residential properties. At the time of writing this report, it appears option D6 has been submitted under application 210858, and is currently under consideration by the LPA. Due to the level of detail provided regarding option D6, I cannot confirm if this is indeed the site proposed under application 210858, but the location illustrated on the aerial photograph within the Site Specific Supplementary Information leads to the conclusion that it appears that option D6 is indeed the site subject of application 210858.

Overall, it is considered that sufficient information has not been provided as to why other options were discounted or why site sharing options have not been explored. Therefore, this application is not considered in accordance with policy OU3 of the Reading Borough Local Plan.

Transport

No objections or concerns have been raised by Reading Borough Council Transport with regards to this application. The monopole and ground based cabinets proposed are located on highway land. The proposed location of the additional equipment cabinets and pole will

not impact on any visibility splays at the junction or obstruct pedestrian movement given that the footway is approximately 4m wide in this location.

Environmental Protection

Concerns have been raised Reading Borough Council Environmental Protection regarding noise arising from the development proposed. The agent stated in an email (in response) that the equipment emits a similar level of noise to that of a refrigerator. As the proposal site is located within 100m of a train station, adjacent to a commercial site (McDonald's and Lidl), and along a main road in and out of the town centre, it is not considered that this development would give rise to noise that would harm the surrounding area. Regardless, in this instance noise is not considered a valid reason for refusal for this application given the type of application that has been submitted and the considerations possible.

Had approval been recommended for this application, a condition restricting the noise levels of the equipment to 10dB below the pre-existing background sound level as measured at a point 1m external to the nearest noise-sensitive facade could have been required, providing another basis for this not being a reason for refusal of the application. This is to safeguard the amenities of the adjoining premises and the area generally, in accordance with Policy CC8 and EN17 of the Reading Borough Local Plan 2019.

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 declaration 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 declaration 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.

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.

Progress of Application

A series of communications were undertaken with the agent during the course of the application, summarised below:

Comm. Method	Date	From	To	Details
Email	20/05/2021	Case Officer	Agent	Agent informed that prior approval is required for this application. Agent is also provided with consultation feedback from Natural Environment.
Email	25/05/2021	Agent	Case Officer	Colleague of the Agent asks for an update regarding application 210597
Email	25/05/2021	Case Officer	Agent	Colleague of the Agent is forwarded the email sent to the Agent on 20/05/2021.
Email	03/06/2021	Case Officer	Agent	Agent is also provided with consultation feedback from Natural Environment, Environmental Protection and Transport. Agent is asked if they wish to address any of the concerns raised by consultees, stating that the LPA is willing to agree an extension of time for concerns to be addressed within this application. The Agent is reminded of the decision date for this application.
Email	04/06/2021	Agent	Case Officer	The Agent reiterates that no issues are expected regarding the trees. Agent states that a refusal decision for this application will be appealed.

Conclusion

On balance, it is considered that the proposal does not comply with Local and National Policy guidance on the siting and appearance of new telecommunications equipment and therefore Prior Approval is not granted. It is considered that the proposal would detrimentally impact the visual amenity and appearance of the surrounding area by virtue of the height of the 15m monopole.

The siting of the proposed monopole and associated cabinets is not considered acceptable in the absence of sufficient tree information being provided. The failure to demonstrate appropriate mitigation towards the highway trees is considered a siting issue. The application has also failed to provide sufficient detail relating to alternative sites and site sharing options.

The application has failed to overcome reasons for refusal numbers 1, 2 and 3 for previous application 200937. Therefore, refusal is recommended for application 210597 for those reasons.

Reasons for refusal:

1. The proposed 15m high monopole, would, by reason of its height 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. In the absence of sufficient detail on potential alternative sites for the development, it could not be assessed as to whether this proposed location would be most suitable in terms of siting, contrary to Policy OU3 of the Reading Borough Local Plan (2019).
3. The proposed development, by reason of its siting, has failed to demonstrate that it would not detrimentally impact nearby highway trees, contrary to Policies CC7 and EN14 of the Reading Borough Local Plan (2019) and the Reading Borough Council Tree Strategy (2021).

Recommendation

PRIOR APPROVAL NOT GIVEN

Development By Telecommunications Code System Operators. Determination By Reading Local Planning Authority That The Prior Approval Of The Authority Is NOT GIVEN For The Siting And Appearance Of Development Permitted By Part 16 Of Schedule 2 Of The Town And Country Planning (General Permitted Development) (England) Order 2015.

I refer to your letter which was received by Reading Borough Council on 16th April 2021, in respect of the proposed installation of a 15m monopole with ground-based equipment cabinets along with ancillary development at: Site Adjacent to 287 Oxford Road, Reading, RG30 1AU, as shown on the submitted drawings and documents:

The agent supplied the following plans:

- 002 SITE LOCATION PLAN - RDG11079_M002 Issue B
- 150 EXISTING ELEVATION A - RDG11079_M002 Issue B
- 100 EXISTING SITE PLAN - RDG11079_M002 Issue B
- 210 PROPOSED H3G SITE PLAN - RDG11079_M002 Issue B
- 260 PROPOSED H3G ELEVATION - RDG11079_M002 Issue B
- 303 PROPOSED H3G ANTENNA SCHEDULE & LINE CONFIGURATION - RDG11079_M002 Issue B
- 305 EQUIPMENT SCHEDULE & SUPPORT STRUCTURE DETAILS - RDG11079_M002 Issue B
- Declaration of Conformity with International Commission on Non-Ionizing Radiation Protection Public Exposure Guidelines
- Site Specific Supplementary Information - RDG11079

Received on 16/04/2021

I am writing to advise that Reading Borough Council as local planning authority hereby NOT GIVE approval for the siting and appearance of the development proposed in the above-mentioned application in accordance with the submitted drawings and documents.

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 prior approval to be granted. However, that has not been possible within the agreed timescale and therefore the decision to refuse the application has been taken.