

DELEGATED APPLICATION REPORT

Application No: 200753/TEL

Address: The Southcote PH, Bath Road

Proposal: Application for prior notification of proposed development by telecommunications code systems operators.

Case Officer: Connie Davis

Applicant: MBNL (EE UK Ltd & H3G UK Ltd)

Agreed Target Date: 10/08/20

Site Description and Surrounding Area

The application site relates to highways land outside the Southcote PH on the corner with Southcote Lane and Bath Road, adjacent to the mini roundabout connecting the two roads. The surrounding area is urban but does comprise residential dwellings on Southcote Lane.

The Bath Road (A4) is a major corridor into and out of Reading town centre. An existing 13.7m high monopole is already in situ near the proposed site (and a bus layby) along with a lamp post, as can be seen in the image below.



Proposal

The proposal seeks for prior notification of proposed development by telecommunications code systems operators for the installation of a 17m high monopole with 4 associated cabinets which are less than 1.5 metres cubed. The monopole is proposed to be painted light grey.

The existing monopole is to be retained and decommissioned. The existing cabinets are also proposed to be retained.

Plans/Documents Considered

992170_RDG007_50299_RG4301_M001 Issue A - 002 Site Location Plan

992170_RDG007_50299_RG4301_M001 Issue A - 100 Existing Site Plan

992170_RDG007_50299_RG4301_M001 Issue A - 150 Existing Site Elevation

992170_RDG007_50299_RG4301_M001 Issue A - 215 Proposed Site Plan

992170_RDG007_50299_RG4301_M001 Issue A - 265 Proposed Site Elevation

Letter Ref RDG007 prepared by Mono Consultants Ltd

Letter Ref RDG007 prepared by Mono Consultants Ltd - Notification Letter

ICNIRP Certificate
Highways Owner Delivery Receipt
Supplementary Information Form

Received 3rd June 2020

Relevant Planning History

No formal applications received for telecommunication development around the site.

Internal Consultations

Natural Environment: No objection, subject to informative

Transport: Revised plans required (see discussion later in report)

External Consultees

The following addresses were formally consulted via letter on 09/06/20:

The Southcote PH

In addition, a site notice was displayed between 20th June - 11th July 2020.

No 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
- 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 proposed mast and associated equipment complies with Part 16, Class A.1(1) and Class A.1(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.2(1)(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 within the surrounding area.

Appearance and Visual Impact

Icon	Icon Name	Description
	Proposed Antenna	The proposed location for the monopole and associated cabinets.
	Viewing Angle 1	The view to be appraised looking from Southcote Lane
	Viewing Angle 2	The view to be appraised heading north-east along Bath Road
	Viewing Angle 3	The view to be appraised heading south along Bath Road

proposed monopole, by virtue of its height, the associated cabinets (over and above those already in place, which are not to be removed), it is considered that from the viewpoint shown above (which is the view from a residential area) that these would have a detrimental cumulative effect and result in a substantial level of street clutter. In addition, this portion of Southcote Lane descends, so the application site is on slightly higher ground than the residential properties on Southcote Road, which will aid its prominence within the streetscene. The existing monopole is not considered as visible to the residents of Southcote Road compared to the proposed 17m monopole.

Viewing angle 2



Given the existing monopole is clearly visible from this angle, and the Bath Road is a major corridor to the town centre, it is not considered that the placement of the pole and cabinets would cause detrimental effect to the street scene from this position.

Viewing angle 3



The existing and proposed equipment cabinets would be clearly visible when travelling out of Reading, as opposed to viewing angle 2. At ground level the proposed cabinets are considered to add to the street clutter along the pavement. Residential development lies to the south (view 1) and as such the proposed development would appear intrusive by virtue of its bulk (considering the ancillary equipment and the existing street furniture). The built environment of the surrounding area is predominately two storey dwellinghouses which are on lower ground level (as is The Southcote PH) and as such it is considered the proposed 17m monopole would appear dominant in the skyline due to its height, and also

width (0.8m max including antennas) in comparison to the existing monopole, which has a height of 13.7 and width of 0.5m.

The combination of the size, location and number of proposed cabinets, along with those retained, and the proposed and retained monopoles, creates an unacceptable cumulative impact of the proposed development with respect to siting and appearance.

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. This also applies to policy OU3 of the Reading Borough Local Plan (Adopted November 2019), which states that telecommunications development will be permitted where the apparatus will be sited and designed as to minimise its visual impact by the use of innovative design solutions 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.

Alternative Sites

8 alternative sites were presented within the supplementary information provided for this application. These included siting the proposed development on the roof of the Southcote PH, Belgravia Court and Priory Point.

It was also stated that it had been considered that the existing monopole be redeveloped, however, this option was discounted as it is not a sharable structure in its current form and cannot accommodate any further equipment.

The supplementary site information provided for this application indicates that the proposed site is justified, and although the LPA’s view is that the proposed scheme is unacceptable, there is acceptance, from the alternative sites’ information presented by the applicant, that this would be the least sensitive location of the eight presented and considered. Nevertheless, the siting and appearance of this proposed scheme is still considered unacceptable, as discussed.

Transport

Proposed plans do not demonstrate the location of the tactile paving and street sign (Southcote Lane) with the proposed cabinets in place so that the proposal can be fully assessed.

The Highway Authority also require any redundant mast to be removed. Therefore, RBC Transport required the applicant to submit revised plans illustrating the removal of the decommissioned pole and a standard streetlight column with an LED lantern to our specification with Mayflower CMS is installed. This is to ensure that the Council’s current lighting contractor provider will maintain the structure.

No revised plans were received addressing the above.

Natural Environment

Clarification was provided on how the monopole and signals would interfere with adjacent trees, some of which have TPOs. The information as deemed acceptable and the following informative recommended to be attached should prior approval be given:

You are advised that the Bath Road is an important treed corridor, as defined in our Tree Strategy, and contains a significant number of important trees, both Council street trees and private trees subject to Tree Preservation Orders on frontages. There should be no assumption that pruning detrimental to the health or amenity value of any of these trees will be agreed in the future in order to maintain coverage, as it is expected that the applicant will have considered the potential impact of 'natural clutter' and sited their equipment accordingly.

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 "ICNIRP¹ 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.

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.

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	17/07/20	Case Officer	Agent	Asking to confirm tree information. Response was received which was sufficient

¹ International Commission on Non-Ionizing Radiation Protection

Comm. Method	Date	From	To	Details
Email	24/07/20	Case Officer	Agent	Agent advised of transport comments. EOT was agreed to address these
Email	06/08/20	Case Officer	Agent	Agent contacted to ask for update. Case officer asked agent as to why the existing equipment was required to be kept as it adds to street clutter. Advised the application would be recommended for refusal unless these issues were addressed and a further EOT agreed
Email	07/08/20	Agent	Case Officer	Chaser email sent to the agent who confirmed they wished for the application to be determined in line with the agreed target date (10/08/20) without providing any revised information.

Conclusion

Whilst acknowledged the chosen application site is urban in nature, the siting of the proposed monopole and associated cabinets is not considered acceptable given the scale and bulk of the proposal. The proposed additional cabinets are considered to add to the existing clutter at the proposal site. The addition of a 17m monopole and the retention of a decommissioned 13.7m monopole is considered not to respect the visual amenity of the surrounding area which is in part residential.

Reasons for refusal:

1. The proposed 17m high monopole and associated equipment, in combination with the existing telecommunications equipment, would, by reason of its height and overall bulk, 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. It has not been demonstrated that the siting of the proposed monopole and associated would be acceptable in relation to existing street infrastructure (road signage and tactile paving). In addition, the applicant has not committed to replacing the decommissioned monopole with a streetlamp of the specification required by the Local Highways Authority. As such, it has not been demonstrated that the proposal would be acceptable in terms of Policy TR3 of the Reading Borough Local Plan (2019).

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 (as amended).

I refer to your letter which was received by Reading Borough Council on 3rd June 2020, in respect of the proposed installation of a 17m pole with ancillary cabinets at the Southcote PH, Bath Road, Reading, as shown on the submitted drawings and documents:

The agent supplied the following plans:

Drawing No.

992170_RDG007_50299_RG4301_M001 Issue A - 002 Site Location Plan

992170_RDG007_50299_RG4301_M001 Issue A - 100 Existing Site Plan

992170_RDG007_50299_RG4301_M001 Issue A - 150 Existing Site Elevation

992170_RDG007_50299_RG4301_M001 Issue A - 215 Proposed Site Plan

992170_RDG007_50299_RG4301_M001 Issue A - 265 Proposed Site Elevation

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Highways Owner Delivery Receipt

Supplementary Information Form

Received 3rd June 2020

I am writing to advise that Reading Borough Council as local planning authority hereby do 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 agreed timescale and therefore the decision to refuse the application has been taken.