

DELEGATED APPLICATION REPORT

Application No: 191837/FUL

Address: Site to the East of 280 The Meadway, Tilehurst, Reading, RG30 4PE

Proposal: Installation of 20m monopole and ancillary equipment

Case Officer: David Brett

Applicant: EE Ltd & H3G Ltd

Received Date: 15/11/2019

Valid Date: 20/11/2019

Target Date: 24/03/2021, extension of time agreed from 15/01/2020

Site Description and Surrounding Area

The Meadway is considered a road that is used to access other parts of the surrounding area. The site is on a triangular space of land at the junction with Church End Lane and to the north of Dunsfold Road. Although the surrounding area is predominantly residential, there are also religious and school uses and Meadway Park in close proximity to the site (as also detailed in the siting and appearance section below). The site is characterised by a number of existing mature trees, although there is an existing pole and cabinets nearby.



Fig 1. Proposed siting of monopole and associated cabinets highlighted in red.

Proposal

The proposal seeks the erection of a 20m monopole with ground-based cabinets and ancillary development. These are shown on the submitted plans as being positioned on the north-west side of the triangular segment of land.

Application 191837 was submitted prior to the submission and determination of prior approval application 200671 at The Meadway. The development proposed within prior approval application 200671 is considered almost identical to the development proposed under application 191837, however, there are some minor additional details on the plans submitted for application 191837. Prior approval for application 200671 was refused on 22/07/2020. Application 200671 failed to address concerns regarding the impact to nearby

highway trees despite a full arboricultural report being submitted to support the application, and a trial dig at the proposal site.

Application 191837 has been assessed on its own merits, however, it was expected that the application would face similar issues and concerns that were raised with application 200671. The Agent was informed of this, with details of communications between the Case Officer and the Agent detailed in the 'Progress of Application' section of this report.

Applications seeking full planning permission for telecoms were until April 2020 automatically considered at Planning Applications Committee. At this time the scheme of delegation was altered to enable officers to determine applications under delegated powers if the officer level recommendation is to refuse permission.

Plans/Documents Considered

The agent supplied the following plans:

- ~~100 Existing Site Plan - SMP028_26533_SO0044_M003 Issue C~~
- ~~150 Existing Elevation A - SMP028_26533_SO0044_M003 Issue C~~
- ~~215 Max Configuration Site Plan - SMP028_26533_SO0044_M003 Issue C~~
- ~~265 Max Configuration Elevation - SMP028_26533_SO0044_M003 Issue C~~

These plans and documents were received on 18th November 2019. These documents appear to have been submitted in error as they bear no relation to the application or the proposal site.

- 002 Site Location Plan - 992173_RDG011_51319_244549_M002 Issue B
- 100 Existing Site Plan - 992173_RDG011_51319_244549_M002 Issue B
- 150 Existing Elevation A - 992173_RDG011_51319_244549_M002 Issue B
- 215 Max Configuration Site Plan - 992173_RDG011_51319_244549_M002 Issue B
- 265 Max Configuration Elevation - 992173_RDG011_51319_244549_M002 Issue B
- Site Specific Supplementary Information
- Declaration of Conformity with ICNIRP Public Exposure Guidelines

These plans and documents were received on 18th November 2019

Internal Consultations

Reading Borough Council, Trees - Response received on 04/12/2019

- *The proposed new monopole and ancillary equipment is likely to be within the rooting areas of trees on site and could potentially cause damage to tree roots during their installation. To date no information has been provided to demonstrate how the structures will be installed without causing significant damage to tree roots through severance, compaction etc. I also have concerns regarding 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 broadleaf trees, Turkey Oak, Alder and Plane all of which have the potential to grow significantly larger than they are today.*
- *I consider that this application is likely to cause harm to the adjacent trees. These trees are not subject of a TPO as they are Council-owned and therefore considered to be under good management. However, the trees would meet the criteria for inclusion in a TPO if the trees were under threat such that it was expedient to protect them within a TPO. Although, it may be possible to limit the harm to the tree's roots during the build with engineering solutions and site specific tree protection, the actual location of the monopole and associated equipment is unsustainable this close to trees. The Borough Council seeks to protect and retain all trees in the Borough where it is safe and reasonable to do so and recognises that the very maximum benefit from trees can be accrued to the local area if the trees*

are allowed to grow to their full potential height and breadth without the foreseeable need for pruning works or to reduce their height in order to prevent them from impacting on the functioning of the telecommunications equipment.

- *I consider that this application is contrary to policy EN14 of the adopted Local Plan which requires that Individual trees, groups of trees, hedges and woodlands will be protected from damage or removal where they are of importance, and Reading's vegetation cover will be extended. The application is also contrary to the objectives within the Boroughs adopted tree strategy and the Revised Sustainable Design and Construction SPD which states that Development will not be permitted which would undermine current levels of tree cover as this is likely to be damaging to climate change adaptation strategies'.*
- *My recommendation is that this application be refused.*

Reading Borough Council, Trees - Further response received on 16/02/2021. Agent asked if the response received on 09/10/2019 was still applicable given the amount of time that has passed since the response was received.

- We have already received a request to prune those Council trees and TPO trees on opposite side of The Meadway to maintain a signal - they (telecoms company) did not pursue this for whatever reason when we asked them to follow due process. This demonstrates the inappropriate location for a transmitter, worsened by the different 5G frequency mentioned in the response dated 04/12/2019.

Reading Borough Council, Ecology Consultant - Response received on 12/12/2019

- *All of the site comprises a strip of amenity grassland. Considering the habitats on site and the extent of the works, it is unlikely that the proposals will affect protected species or priority habitats, and as such, there are no objections to this application on ecological grounds.*

External Consultees

1 Dunsfold Road
2 Dunsfold Road
4 Dunsfold Road
6 Dunsfold Road
12 Dunsfold Road
9 Lambeth Court
10 Lambeth Court

11 Lambeth Court
12 Lambeth Court
Church of Jesus Christ, 280 The Meadway
Churchend Primary School
Moorlands Primary School
The Avenue School

A site notice was erected for a period of 21 days on Tuesday 26th November 2019, expiring on Tuesday 17th December 2019

No consultation responses have been received.

Relevant Planning History

162093 - Notification of Prior Approval for replacement of existing 12m telecommunications monopole with a proposed 13.2m phase 4 telecommunications monopole, installation of 1 no. proposed equipment cabinet plus ancillary apparatus. - Received prior approval on 23/12/2016

200671 - Application for Prior Notification of proposed development by telecommunications code system operators - Part 16 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 for the installation of a 20m monopole with ground-based equipment cabinets along with ancillary development - Refused prior approval on 25/08/2020

Reasons for Refusal:

1. The proposed development, by reason of its siting, has failed to demonstrate that it would not detrimentally impact on nearby highway trees, contrary to Policies CC7 and EN14 of the Reading Borough Local Plan (Adopted November 2019).
2. The proposed ground based cabinets, by reason of their quantity and cumulative size, set within the context of existing nearby cabinets, 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).

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
- EN14: Trees, Hedges and Woodland
- EN15: Air Quality
- TR3: Access, Traffic and Highway-Related Matters
- OU3: Telecommunications Development

Other relevant documents

Reading Borough Council Tree Strategy (March 2021)
Reading Biodiversity Action Plan (March 2021)

Appraisal

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 of 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.

Siting and Appearance



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 heading eastbound along The Meadway.
	Viewing Angle 2	The view to be appraised heading southbound along Church End Lane.
	Viewing Angle 3	The view to be appraised heading westbound along The Meadway.
	Viewing Angle 4	The view to be appraised looking north from Dunsfold Road.

The proposed location for the 20m monopole and seven associated ground level cabinets is towards the rear of a grass verge at the corner of The Meadway and Church End Lane. The surrounding area is characterised as largely residential with two storey semi-detached houses and terraced rows. Moorlands Primary School and Meadway Park is located north of the proposal site, Church of Jesus Christ of Latter-day Saints is located west of the proposal site, with Thames Valley School, Meadway Leisure Centre and The Avenue Special School opposite the proposal site on the south side of The Meadway. A Grade II Listed Building is also located less than 130m from the proposal site (Apple Tree Cottage - 1321908). The Meadway is a classified road that serves the 15, 15a and 33 bus routes.



Fig 3. Viewing Angle 1, heading eastbound along The Meadway.

The first angle to be assessed is looking eastbound along The Meadway. The Church of Jesus Christ of Latter-day Saints is visible to the left, while the proposed 20m monopole would be visible amongst the trees located on the grass verge at the corner of The Meadway and Church End Lane. From this angle, the seven associated cabinets would not be highly visible due to the fence that runs along the outside of the church. The 20m monopole would be the most significant visual impact when viewed from this angle. On the day of the site visit (06/07/2020 between 3pm and 3:30pm), there were not many pedestrians around, however, towards the end of the site visit pedestrian levels increased as nearby schools closed. Vehicle traffic was also not considered high on the day of the site visit, however, the area is known to be busy at peak hours during weekdays.



Fig 4. Viewing Angle 2, heading southbound along Church End Lane.

Similar to viewing angle 1, the most significant change to the views heading southbound along Church End Lane would be the introduction of the 20m monopole. The additional cabinets from this angle would not be highly visible.



Fig 5. Viewing Angle 3, heading eastbound along Basingstoke Road.

The image taken for viewing angle 3 was taken later during the site visit and demonstrates the increased level of highway traffic along The Meadway. From this angle, the 20m monopole would be largely obscured by the surrounding highway trees. From this angle the ground based cabinets would be visible, while shadowed by nearby highway trees.



Fig 6. Viewing Angle 4, The view to be appraised looking north from Dunsfold Road.

The final viewing angle to be observed shows the full extent at which ground based cabinets would become prevalent at ground level as a result of the proposed development. The proposals seek to add seven additional cabinets on the grass verge at The Meadway. The plans show that a total of 9 ground based cabinets (2 of which are existing, 2 existing cabinets to be removed) will be situated in a line to the rear of the grass verge, with the tallest proposed additional cabinet being 1.9m.

The number of cabinets proposed at ground level is not considered appropriate given the character and appearance of the surrounding area. The additional cabinets are considered to not contribute positively to the appearance of the grass verge or wider street scene, with such an increase in equipment representing a proliferation of equipment. While equipment cabinets do currently exist on site, the proposed additional cabinets are considered not to improve or enhance the existing context; in fact they are considered to be harmful, both in themselves and within a cumulative context of there being 9 separate cabinets in close proximity with one another at this part of the street scene; this is considered to be excessive. The size and bulk of the proposed cabinets are also larger than the existing cabinets to be retained and replaced/relocated.

Although the proposed 20m monopole in its siting as demonstrated on the plans would be largely obscured from view by the highway trees, it has not been demonstrated within this application that the nearby trees will be allowed to maintain their current form and be allowed to grow naturally and spread without the pressure to prune to allow for signal interference. As the long term future of the highway trees has not been secured within this application, it is considered that the proposed development would have a detrimental impact on the amenity of the surrounding area.



Fig 7. Existing cabinets next to proposed equipment location.



Fig 8. Existing cabinets next to proposed equipment location.



Fig 9. Existing cabinets to the south east corner of the grass verge.

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”. It is not considered that the proposed 20m monopole and associated ground based cabinets have been sympathetically designed in order to minimise the visual impact on the surrounding area.

In line with policy OU3 of the Reading Borough Local Plan (Adopted November 2019), the proposed monopole and associated cabinets are not considered to have an acceptable impact on the visual amenity of the surrounding area. Overall, it is considered that the inherent benefits of the monopole, in terms of technological advancements in communications, is not considered to outweigh the visual impact that the proposal would have on the character and appearance of the surrounding area.

Amenity and Accessibility

The proposal site is located on the north side of The Meadway, adjacent to The Church of Jesus Christ of The Latter Day Saints. The nearest residential area is approximately 40m south of the proposal site at Dunsfold Road. By virtue of the location and nature of the proposed development, 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 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 to the north of The Meadway. 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

In the first instance, the proposed siting of the development was not considered acceptable by the Reading Borough Council Natural Environment Officer. This is in relation to the existing highway trees surrounding the proposal site on and surrounding the grass verge. While the trees on site are not subject to TPOs, the trees are Council managed and meet the criteria for a TPO. Therefore, the concerning highway trees are to be protected if they are considered under threat by potentially harmful development.

Despite very little arboricultural information submitted to support this application, it is considered that any a tree survey would only further demonstrate the harm that the proposed development would cause to nearby highway trees. These concerns relate to development within the root protection areas of mature highway trees, as well as a pressure to prune to maintain network coverage.

An updated comment from the Reading Borough Council Natural Environment Officer was provided on 18/02/2021, this was requested given the amount of time that has passed since the initial comments were received on 04/12/2019. The updated comment reaffirms that there has been pressure to prune the highway trees to maintain network signal on site, demonstrating that this would be an inappropriate location for a proposed antenna, surrounded by highway trees with a similar canopy height as the proposed 20m monopole. It was also pointed out by the Natural Environment Officer that a trial dig was conducted in August 2020 as part of application 200671 to determine a suitable location for the proposed monopole at the proposal site. The trial dig was performed shortly after the submission of an arboricultural report on 11/08/2020 for application 200671, which proposed an alternative location for the proposed monopole and associated cabinets. It seems that the trial dig was performed to explore the alternative location presented with the arboricultural report. The results of this trial dig were not forthcoming to the LPA within application 200671. The results of the trial dig also seem to have had no bearing on application 191837 as no further information or amended plans for this application have been submitted since August 2020.

When the application was reassigned to a new case officer on 09/02/2021, no further arboricultural information had been submitted since the advice from the Natural Environment Officer was provided on 09/10/2019. The response from the Natural Environment Officer was re-provided to the agent, giving context to the intended reason for refusal for this application in this respect on 19/02/2021. No further comment or supporting information was received from the agent. Therefore, there has been a failure to demonstrate that the proposed development would not detrimentally impact on nearby mature trees and highway trees, contrary to policies CC7 and EN14 of the Reading Borough Local Plan.

Alternative Sites

It has been specified within the Site-Specific Supplementary Information that no alternative sites have been explored prior to submission of this application. The Site-Specific Supplementary Information states that the site was selected based on the approval of existing installations around the site, suggesting a principle of siting of similar equipment had been established. While this precedent is acknowledged; the proposed works within this application are considered significant when assessed against the existing installations on site. In this instance; following this precedent is considered to lead to further erosion of the character and appearance of the existing area, whilst harming the surrounding natural environment.

Discounted options were not presented within this application. As the details of discounted sites have not been provided, it is considered that it has not been demonstrated that alternative sites and site-sharing options have been fully investigated, contrary to policy OU3 of the Reading Borough Local Plan.

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 planning permission.

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	09/02/2021	Case Officer	Agent	Informed agent that the case officer for application 191499 had changed. Requested an update from the agent's perspective on the application.
Email	10/02/2021	Agent	Case Officer	Agent advises that all he has on file are unanswered emails. Informs the officer of a willingness to provide supporting information if requested.
Email	10/02/2021	Case Officer	Agent	Informed the Agent that the case will be re-reviewed, with feedback to be provided on the application by 19/02/2021.
Email	10/02/2021	Case Officer	Agent	Agent sought to agree an extension of time on the decision for this application to 24/03/2021.
Email	11/02/2021	Agent	Case Officer	Agent agrees to the extension, but that the client will be unwilling to extend any further.
Email	19/02/2021	Case Officer	Agent	Agent is provided feedback on the application. Agent informed that it is considered that revisions or additional information will not overcome officer

Comm. Method	Date	From	To	Details
				concerns. Case Officer also attached the email response received from the RBC Natural Environment Officer dated 04/12/2019 (see Internal Consultations section of this report), as the issues raised had not been addressed. Based on this the agent was informed that a refusal decision will be issued on 24/03/2021, unless the application is withdrawn by 9am on 19/03/2021.

No response was received from the agent to the email from the Case Officer dated 19/02/2021 regarding this application.

Conclusion

On balance, it is considered that the proposal would detrimentally impact the visual amenity of the surrounding area due to the introduction of several large equipment cabinets at ground level, set within the context of the retention of existing cabinets, despite the removal of two existing cabinets.

With regards to the 20m monopole, while this would be largely obscured by the existing highway trees, the long term safety of the highway trees has not been assured within the plans or documentation submitted. The considered detrimental impact to the nearby highway trees, as well as the character and appearance of the surrounding area is considered to outweigh the benefits that this scheme represents. The siting of the proposed monopole and associated cabinets is not considered acceptable based on the very limited tree information provided. The failure to demonstrate appropriate mitigation towards the highway trees is considered a siting issue.

Policy OU3 requires development of this nature to demonstrate that alternative sites and site-sharing options have been fully investigated and that no preferable alternative sites are potentially available. Discounted options were not presented within this application. As the details of discounted sites have not been provided, it is considered that it has not been demonstrated that alternative sites and site-sharing options have been fully investigated, contrary to policy OU3 of the Reading Borough Local Plan.

Reasons for refusal:

1. The proposed development, by reason of its siting, has failed to demonstrate that it would not detrimentally impact on nearby highway trees through direct harm to the root systems or by future pruning requirements to maintain network coverage, contrary to Policies CC7 and EN14 of the Reading Borough Local Plan (Adopted November 2019).
2. The proposed ground-based cabinets, by reason of their quantity and cumulative size, set within the context of existing nearby cabinets, 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)
3. 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).

Recommendation

REFUSE

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 agreed extended timescale 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. Please see the following link to the Council's pre-application service here:

http://www.reading.gov.uk/media/1190/Pre-Application-Enquiry-Form/pdf/Pre-app_Nov_2016.pdf

I00: Plans

The refusal relates only to the following plans and information as received by the local planning authority:

Plans Considered:

- 002 Site Location Plan - 992173_RDG011_51319_244549_M002 Issue B
- 100 Existing Site Plan - 992173_RDG011_51319_244549_M002 Issue B
- 150 Existing Elevation A - 992173_RDG011_51319_244549_M002 Issue B
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