

DELEGATED APPLICATION REPORT

Application No: 200672/TEL

Address: Land at Bath Road, Reading

Proposal: 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

Case Officer: David Brett

Applicant: EE & H3G Ltd

Received on: 15/05/2020

Valid on: 20/05/2020

Target Date: 22/07/2020 (extended from 15/07/2020 to allow for submission of further supporting information)

Site Description and Surrounding Area

Bath Road is considered a road that is used to access other parts of the surrounding area. The proposed telecoms equipment is sited adjacent to one of Reading's main historic parks, Prospect Park (para. 7.1.4 of the Reading Borough Local Plan (Adopted November 2019)). The development site is situated along the potential Mass Rapid Transport (MRT) route as demonstrated in the Reading Borough Local Plan (Adopted November 2019) (Figure 6.1: Area Strategy for West Reading and Tilehurst, page 183). Bath Road is designated as an air quality management area, and area with high treescape value within the Reading Tree Strategy.



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

Proposal

The proposal seeks prior notification of proposed development by telecommunications code systems operators. The proposal includes the erection of a 20m monopole with ground-based cabinets and ancillary development.

Plans/Documents Considered

The agent supplied the following plans:

- ~~002 Site Location Plan 987048_RDG020_51640_RG4283_M001_Issue A~~
- ~~215 Max Configuration Site Plan 987048_RDG020_51640_RG4283_M001_Issue A~~
- ~~265 Max Configuration Elevation 987048_RDG020_51640_RG4283_M001_Issue A~~
- Site Specific Supplementary Information
- ~~Declaration of Conformity with ICNIRP Public Exposure Guidelines~~

These plans were received on 15th May 2020

- 002 Site Location Plan - 987048_RDG020_51640_RG4283_M001 - Issue B
- 215 Max Configuration Site Plan - 987048_RDG020_51640_RG4283_M001 - Issue B
- 265 Max Configuration Elevation - 987048_RDG020_51640_RG4283_M001 - Issue B
- Declaration of Conformity with ICNIRP Public Exposure Guidelines (amended)

These plans were received on 20th May 2020

- Arboricultural Report: MBNL Mast Site: RDG 020, Bath Road, Southcote, Reading, RG30 3QE

These plans were received on 14th July 2020

Relevant Planning History

151565 - Replacement of existing 12.4 lamppost monopole with a 13.2m high lamppost monopole with 1 no. additional equipment cabinet (amended description). Granted Prior Approval on 21/10/2015

191499 - Installation of a new 20m high Street Works Pole along with additional equipment cabinets and ancillary development. - Target determination 25/11/2019, application decision yet to be determined.

Internal Consultations

Trees - Response received on 28/05/2020

- The siting of the proposal (I believe siting is under consideration) is in no way acceptable in relation to trees and the lack of any detailed tree information or arboricultural impact assessment is not acceptable.
- Bath Road is a major route in/out of town and a designated treed corridor in our adopted Tree Strategy. As such, any development should not result in a negative impact on trees either directly or indirectly. The proposal location is directly adjacent to large trees which have the potential to grow larger.
- The installation of the cabinets will require excavation for their bases which could damage roots. The installation of the equipment, particularly the pole, is likely to require branch pruning. We know that tree canopies typically block the 5G signal, hence the location of this pole will result in the likelihood of the trees needing to be pruned in the future to maintain sight lines both adjacent to the equipment and the significant trees on the opposite side of the road - no sight line details have been provided. Trees along such an important route should not be confined in size as a result of poorly sited equipment - limiting a tree's size limits the environmental benefits it provides. Please note that this is not a spurious comment as we have recently received a S211 Notice to reduce trees further down the Bath Road in order to maintain the signal from a mast on the opposite side of the road (trees adjacent to the mast also required pruning).
- There are multiple detrimental impacts of this proposal, none of which have been considered.
- The submissions include the statement:
 - *'The proposed site can be seen below in Figure 1, the site is located on Bath Road in close proximity to existing street furniture (street lights) surrounded by mature trees on both sides of the carriageway helping screen the site from several views and reduce the visual impact of the site greatly'*
- This in no way mitigates the potential short and long term harm to trees.
- I strongly object to this proposal for the reasons stated above.

Trees - Further response received on 15/07/2020 in relation to Arboricultural Report received on 14/07/2020

- With reference to the Arboricultural Report from Wildwood Trees, this does not allay my concerns regarding the proposal for the following reasons:
 - The Tree Protection Plan does not show the proposal, i.e. location of the Cabinets and pole in relation to the trees, which it should.
 - The Arb Report appears to be confined to those trees adj to the existing equipment plus one Lime further east adj to the proposed Pole. I would have expected the survey to include all trees adjacent to the other cabinets east of the Pole. This (from estimating the location) includes a large Turkey oak (set back from the pavement) and an adjacent Lime.
 - There is no comment in the Arb Report on the potential impact of the proposal, either now or in the future, in terms of the potential pressure to prune to give sight lines. Given my concern on this matter, I would have expected the survey to consider other surrounding trees adjacent to and opposite the site.
 - 6.2 states: The new mast and cabinets will require foundations and ducting routes to be dug out, to a depth of approximately 1m, all within the existing pavement area and close to Lime (T1). It is therefore recommended, that once the existing tarmac and sub-base has been removed, that several, (3 or 4), trial pits, be dug carefully by hand, to a depth of 60-70cm, along the line of the proposed mast location, to establish whether there are no major tree roots within this area. If any roots are encountered, greater than 25mm, then they will need to be avoided and further trial pits dug to establish the true spread of the trees roots. (Any larger roots encountered are likely to be from the lime tree (T1), growing close to the proposed site).
 - This doesn't really confirm that major roots (if found) could be worked around.
 - 6.3 states: Lime (T1), Norway maples (T2), (T3) and Cherry (T5) will require some minor crown raising and pruning, over the pavement, to avoid possible damage during construction and to allow access to the site for machinery and plant.
 - No specific details are provided as would be expected (perhaps in Section 7).
 - Section 7 (Tree Protection Method Statement) does not deal with the excavations mentioned in the AIA section (see above), as I would expect it to.
- In conclusion, the report has not confirmed that the siting of the proposal is acceptable now or long-term.

Transport -response received on 09/07/2020

- The proposed location of the additional equipment cabinets and pole will not impact on any visibility splays at the junction or obstruct pedestrian movement.
- It is noted that the 13.2m high lamppost structure on root foundation will be made redundant. The Highways department no longer accept combined telecom/streetlight units as they have caused maintenance problems. I have liaised with the Council's Highways department and they have requested that the entire column is removed 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.
- In view of this, the applicant is requested to revise the proposals to replace the current monopole with a standards streetlight column.

Ecology - Response received on 16/06/2020

- The main habitat to be affected by the proposals is hardstanding which is of low ecological value and unlikely to be used by protected species.
- As such, since protected species are unlikely to be affected by the proposals, there are no objections to this application on ecological grounds.

External Consultees

Flat 1, 30 Granville Road
Flat 2, 30 Granville Road
Flat 3, 30 Granville Road
Flat 4, 30 Granville Road
Flat 5, 30 Granville Road
Flat 6, 30 Granville Road

Flat 7, 30 Granville Road
Flat 8, 30 Granville Road
Flat 9, 30 Granville Road
Flat 10, 30 Granville Road
Flat 11, 30 Granville Road

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
- EN1: Protection and Enhancement of The Historic Environment
- EN14: Trees, Hedges and Woodland
- EN15: Air Quality
- 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 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 three 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 heading eastbound along Bath Road.
	Viewing Angle 2	The view to be appraised heading westbound along Bath Road.

The proposed location for the 20m monopole and seven associated ground level cabinets is along Bath Road, directly south of Prospect Park, Tilehurst. The immediate surrounding area consists of one of Reading's main historic parks. To the south of the proposal site is the Florian Gardens residential estate.

Bath Road (A4) is considered a main road that links the centre of Reading to the western parts of the borough, including Southcote and Tilehurst. The section of Bath Road upon which the proposed development is to take place is considered very open and green. The proposal site is on the north side of Bath Road, adjacent to the tree line that runs along the front of Prospect Park.



Fig 3. Viewing Angle 1, heading eastbound along Bath Road. Photo taken on 06/07/2020.

The westbound approach to Reading town centre along the section of Bath Road which hosts the proposal site is considered green and open. A tree line fronting the edge of Prospect

Park is situated to the north of Bath Road, while an open field with several trees is situated to the south of the highway. South of the field is the Florian Gardens housing estate.

The proposal site also features an existing lamppost/monopole structure. The plans indicate that the antenna is to be removed from this structure, with the lamppost retained. As demonstrated on figures 3 and 4, the antenna just sticks out above the canopy. Due to the growth of the trees along this road, it is difficult to make out the existing cabinets. This is largely attributed to the shadowed cover of the pavement provided by the trees. The height of the existing lamppost/monopole structure is 13.5m.



Fig 4. Viewing Angle 2, heading westbound along Bath Road.

The proposed 20m monopole is proposed to be sited approximately 11m east of the lamppost/monopole structure. Any structure of this size would be highly visible along the highway. Based on the findings from the site visit and the existing growth of the trees along Bath Road, it is considered that the proposed 20m would be largely obscured to a height of 14m. This would mean that the associated antennas would be visible. It should be noted that this is the view considered based on the setting and growth of the trees as witnessed on 06/07/2020. A 20m monopole would be more visible than the existing 13.5m monopole and this additional height of the monopole is considered considerable, and would no doubt be noticeable within the street scene, protruding from the canopy.

In relation to policy EN1 of the Reading Borough Local Plan (Adopted November 2019), proposals which affect Historic Parks (such as Prospect Park the site adjoins) should not detract from the character, appearance and setting of the Historic Parks (amongst other matters). Put simply, a monopole which far exceeds the canopy cover in the vicinity - and therefore unlike the existing situation) would detract from the character, appearance and setting of the historic park. It is considered that the 20m monopole would detract from views in and out from the historic park. Along Bath Road the monopole would be highly

visible along Bath Road, while within the park looking south there would also be a change in the largely verdant character at this point. This concern was not raised with the applicant during the application, as the historical setting of the park was further considered during a discussion amongst officers prior to the deadline for issuing the decision. Given the historic park setting in relation to Prospect Park, it is considered that the proposal, by virtue of its height, would detract from the character and appearance of the historic park.

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, owing to the designated status of the historic park.

Tree Matters - Siting

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 trees surrounding the proposal site. It was also pointed out that no tree information had been supplied to demonstrate the impact of the proposals to this section of Bath Road, which is designated a tree corridor in the adopted Tree Strategy. The trees that would potentially be affected by the proposal are designated an area with high treescape value within the Reading Tree Strategy.

Based on the feedback provided by the Natural Environment Officer, it was requested to the agent that tree information be provided to support the application, including an Arboricultural Impact Assessment, Method Statement and Tree Protection Plan. This information was requested on 3rd June 2020.

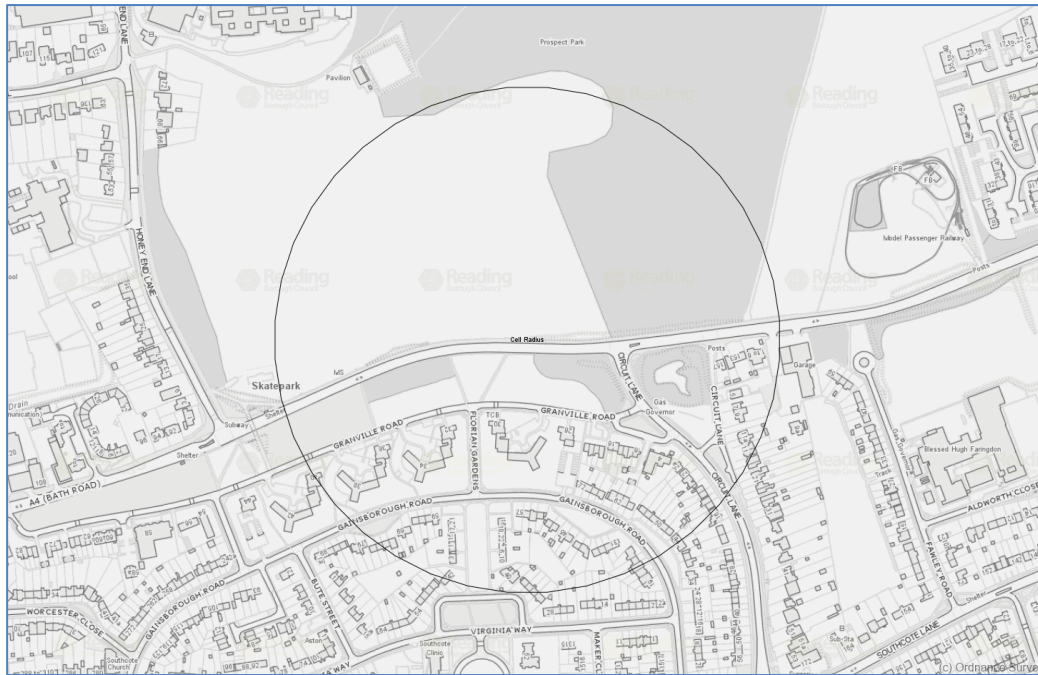
An Arboricultural Report was provided by the agent on 14th July 2020 to support the application. This report was subsequently reviewed by the Natural Environment Officer. It was pointed out that the report did not indicate the proposal site on the Tree Protection Plan or address the impact of installing additional cabinets on the proposal site. This relates to the impact of the proposal on the rooting of trees surrounding the proposal site, as well as to what degree pruning would be required of the existing trees. The report also does not address any excavation required for the installation of the monopole and associated cabinets.

Alternative Sites

No alternative sites have been presented within this application for the proposed development. It is stated in the Site Specific Supplementary Information within this proposal that site was selected based on the fact the LPA previously agreed development on site. While this justification does not directly refer to application 151565, it is assumed that the existing lamppost/monopole structure and associated cabinets are the justification for the siting of the proposed 20m monopole and associated cabinets.

It was also stated within the Site Specific Supplementary Information that discounted options were supplied within the original planning submission. It is not stated which submission this refers to. Discounted options were not presented within this application.

It was proposed that the development site be moved to the other side (south) of Bath Road to reduce the impact on highway trees. It is considered that this option was not fully explored within this application.



250m cell radius in relation to proposed monopole.

Transport

It was requested by Reading Borough Transport that the applicant is revise the proposals to replace the current monopole with a standards streetlight column. The plans demonstrated that the existing lamppost structure would be retained while the antenna would be removed.

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 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	03/06/2020	Case Officer	Agent	Request for an Arboricultural Impact Assessment, Method Statement & Tree Protection Plan to support the application.
Email	10/06/2020	Case Officer	Agent	Requested for an update on the progress of obtaining tree information (as requested on 03/06/2020). Also requested justification for the additional cabinets proposed on site, and confirmation of which existing cabinets are to be removed and demonstrated on plans. Proposed relocation of proposed monopoles to minimise impact to highway trees.
Email	23/06/2020	Case Officer	Agent	Follow up email chasing a response to the email sent on 10/06/2020.
Email	23/06/2020	Agent	Case Officer	Informed case officer that the information has been requested and will be forwarded over as soon as possible.
Email	08/07/2020	Case Officer	Agent	Request for further update on progress of requested information, including tree information and justification specified in email on 10/06/2020.
Email	08/07/2020	Agent	Case Officer	Informed case officer that design team are producing the requested information.
Email	08/07/2020	Case Officer	Agent	Suggested extension of time on the decision for the application to allow for the requested information to be submitted and assessed.
Email	09/07/2020	Case Officer	Agent	Details of consultation response received from Reading Borough Council Transport.
Phone Call	10/07/2020	Case Officer	Agent	Requested update on how the requested information is progressing. Verbally agreed extension of time on decision for application.
Email	10/07/2020	Case Officer	Agent	Confirming extension of time on the decision for the application from 15/07/2020 to 22/07/2020.

Comm. Method	Date	From	To	Details
Email	10/07/2020	Agent	Case Officer	Extension of time on decision agreed.
Email	13/07/2020	Agent	Case Officer	With reference to email sent by case officer on 09/07/2020. Confirm the cost of a replacement lamppost structure and seek client approval.
Email	13/07/2020	Case Officer	Agent	Confirmation that case officer has asked the question to Transport and Highways Team as to the cost of a new lamppost.
Email	13/07/2020	Agent	Case Officer	Asked if Transport/Highways expect the replacement lamppost to be sited in the same location as existing lamppost/monopole.
Email	13/07/2020	Case Officer	Agent	Confirmation that case officer has asked the question to Transport and Highways Team as to the location of a new lamppost.
Email	14/07/2020	Agent	Case Officer	Arboricultural Report for application sent to case officer.
Email	14/07/2020	Case Officer	Agent	Case officer acknowledging receipt of Arboricultural Report and informed that it has been passed on to the Natural Environment Officer to review.
Email	15/07/2020	Case Officer	Agent	Update informing the agent that Highways are seeking costings for the replacement lamppost from SSE. Confirmation that Highways are happy to accept a new lamppost sited in the location of the existing lamppost/monopole.
Email	15/07/2020	Agent	Case Officer	Suggested that it would be easier to remove the antenna from the existing lamppost/monopole and retain the existing lamppost.
Email	15/07/2020	Case Officer	Agent	Confirmation that case officer has asked the question to Transport and Highways Team as to whether retaining the existing lamppost is acceptable.
Email	16/07/2020	Case Officer	Agent	Feedback from Natural Environment Officer on Arboricultural Report provided to agent. Informed agent that case officer is yet to receive a response from Highways regarding cost of a new lamppost, however, Highways did confirm that the preference is that the existing lamppost be replaced due to the lighting contractor (to RBC) refusing to work on the existing structure. With regards to the progress of the application, the agent is informed that based on the arboricultural report not overcoming previous concerns relating to highway trees. We would be looking to issue a refusal on Wednesday 22 nd July. Option provided to withdraw the application by 9am on Monday 20 th July.
Email	20/07/2020	Case Officer	Agent and	Colleague of case officer had received an out of office notification from the agent. Case officer

Comm. Method	Date	From	To	Details
			colleague of agent	contacted colleague of agent referenced in out of office notification. Option given by case officer to withdraw the application by 2pm on Tuesday 21 st July or received refusal decision on Wednesday 22 nd July.

By virtue of the applicant agreeing to an extension of time, it is assumed by all parties to be clear that the prior approval of the local planning authority has been required in this instance.

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, character and appearance of the historic park setting by virtue of the height of the 20m monopole. It is considered that the 20m monopole would compromise key views out from the park, with the height of the proposal protruding from the existing canopy of highway trees along Bath Road.

The siting of the proposed monopole and associated cabinets is not considered acceptable based on the tree information provided. The tree information provided has failed to demonstrate that the proposed development would safeguard the existing highways trees either at the time of the construction or thereafter. The failure to demonstrate appropriate mitigation towards the highway trees is considered a siting issue.

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 20m high monopole, by reason of its height, would detract from the appearance of the designated historic Prospect Park, contrary to Policy EN1 of the Reading Borough Local Plan (Adopted November 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.

I refer to your letter which was received by Reading Borough Council on 15th May 2020, in respect of the proposed installation of a 20m column with ground-based equipment cabinets along with ancillary development at: Land at Highways land on Highways Land Off Bath Road, Southcote, Reading, Berkshire RG30 3QE, as shown on the submitted drawings and documents:

The agent supplied the following plans:

- Site Specific Supplementary Information

These plans were received on 15th May 2020

- 002 Site Location Plan - 987048_RDG020_51640_RG4283_M001 - Issue B
- 215 Max Configuration Site Plan - 987048_RDG020_51640_RG4283_M001 - Issue B
- 265 Max Configuration Elevation - 987048_RDG020_51640_RG4283_M001 - Issue B
- Declaration of Conformity with ICNIRP Public Exposure Guidelines (amended)

These plans were received on 20th May 2020

- Arboricultural Report: MBNL Mast Site: RDG 020, Bath Road, Southcote, Reading, RG30 3QE

These plans were received on 14th July 2020

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 agreed the extended timescale (by 22/07/2020, as agreed in email correspondence on 10/07/2020) and therefore the decision to refuse the application has been taken.

It is advised that the local planning authority is mindful that there is a current full application under consideration at the same site (Ref 191499).