

DELEGATED APPLICATION REPORT

Application No: 200801/TEL

Address: Eastern Grass Verge outside 94 Chiltern Road, Caversham, Reading, RG4 5JD

Proposal: Application for prior notification of proposed development by telecommunications code systems operators for the installation of a 20 metre phase 8 pole with wrap around cabinet built around the base, 3no. new equipment cabinets and ancillary development thereto.

Case Officer: David Brett

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

Received on: 11/06/2020

Valid on: 11/06/2020

Target Date: 06/08/2020

Site Description and Surrounding Area

Chiltern Road is considered an access road to a predominantly suburban part of Caversham, serving access to cul-de-sacs such as Cawsam Gardens, Ragland Gardens, as well as Valentine Crescent. The surrounding area is characterised as residential, consisting of similarly designed two-storey semi-detached dwellings. The proposal site is also in close proximity to Henley Road allotments, The Hill Primary School, and Reading Cemetery & Crematorium.



Photo taken facing south east



Photo taken facing north east

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

Proposal

The proposal seeks for prior notification of proposed development by telecommunications code systems operators for the installation of a 20 metre phase 8 pole with wrap around cabinet built around the base, 3no. new equipment cabinets and ancillary development thereto upon a grass verge at Chiltern Road.

Plans/Documents Considered

The agent supplied the following plans:

- 002 Site Location Plan - 1185859_RDG079_10900_RG4655_M001 - Issue A
- 100 Existing Site Plan - 1185859_RDG079_10900_RG4655_M001 - Issue A
- 150 Existing Site Elevation - 1185859_RDG079_10900_RG4655_M001 - Issue A
- 215 Proposed Site Plan - 1185859_RDG079_10900_RG4655_M001 - Issue A
- 265 Proposed Site Elevation - 1185859_RDG079_10900_RG4655_M001 - Issue A
- ICNIRP Certificate
- Supplementary Information Form

These plans were received on 11th June 2020

Relevant Planning History

011321 - Erection of 1 x 8m stand alone steel telecommunications telegraph pole, mounted antenna and street cabinet - Prior Approval Notification - Approved on 07/09/2001

990648 - Erection of free-standing telegraph pole 8m in height with 3 directional antenna - Application Refused on 05/01/2001

Internal Consultations

Environmental Protection - No response has been received.

Transport - Response received on 24/07/2020

- All of the equipment will be located on highway land. However, the proposed location of the additional equipment cabinets and pole will not obstruct pedestrian movement given that the cabinets will be located within the verge.
- The plans indicate that the existing EE/H3G 8.0m High L2 Streetworks pole on root foundation is to be retained and decommissioned. However, the Highway Authority require any redundant mast to be removed. Therefore, the applicant is requested to submit revised plans illustrating the removal of the decommissioned pole.

Trees - Response received on 30/06/2020

- I note that the Google St view picture is out of date as this only show one pole and one cabinet (referred to on existing plan as 'two') in the verge in question (below right), whereas the existing plan shows 2 additional, existing cabinets west of these hence the existing situation consists of one pole and 4 cabinets.
- The proposal will result in a significant amount of equipment on that one verge which I would suggest (when also added to the cabinet to the east) is detrimental to the street scene.
- In relation to trees, those immediately adjacent are noted on the plans. The TPO Oak tree in the rear garden of 94 Chiltern Road is not noted and I assume the presence of this tree has been taken into account in assessing the site in relation to surrounding 'built and natural clutter' - the supplementary information indicates siting has taken such 'clutter' into account.
- If approved, please attach the following informative:
 - There should be no assumption that this approval will result in agreement to carry out pruning to the protected Oak tree at 94 Chiltern Road in order to maintain signal coverage. The applicant is assumed to have taken the existence and future growth of this tree into account in siting their equipment.

External Consultees

90 Chiltern Road
92 Chiltern Road
94 Chiltern Road

96 Chiltern Road
113 Chiltern Road
115 Chiltern Road

1 Cawsam Gardens
2 Cawsam Gardens

20 Cawsam Gardens

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 applicant was informed via email during the application that prior approval was required. The applicant was also advised that, as per The Town and Country Planning (General Permitted Development) (England) Order 2015, Schedule 2, Part 16 (A.3 (7) (C)), the applicant would be notified within a period of 56 days from the receiving of the application as to whether or not prior approval is given or refused (by 6/8/20).

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 looking south east along Chiltern Road.
	Viewing Angle 2	The view to be appraised heading north west along Chiltern Road.
	Viewing Angle 2	The view to be appraised looking at the proposal site facing east.

The proposed development includes the erection of a 20m monopole approximately 3.2m south east of the existing 8m monopole on site. The 20m monopole has a maximum width of width of 0.46m, while the bulk of the proposed antennas contribute to a width of 0.8m from 15.3m upwards. By contrast, the existing 8m monopole on site has a maximum width of 0.22m (from ground level to 1.46m), while the antenna has a width of 0.22m. It has been specified in the application that the existing 8m monopole is to be decommissioned and retained.

Three additional equipment cabinets have also been proposed on site; one to the north west of the proposal site, the other two to the south east of the proposal site next to the proposed 20m monopole. The largest equipment cabinet has a height of 1.75m and occupies an area of 1.25m². There are four existing cabinets on site, all of which are retained as part of this proposal. Overall, the proposal site includes seven cabinets, an 8m monopole and a 20m monopole.



Fig 3. Viewing Angle 1, looking south east along Chiltern Road. Photo taken on 29/07/2020. Note: The contrast and brightness of the photo has been increased to more clearly demonstrate the built environment.

The existing 8m monopole is just visible from the top of Chiltern Road, looking south east. At first glance, the existing 8m monopole could be mistaken for a streetlight. The overall proposal site is not highly visible from this view. The proposed additional equipment cabinets and existing cabinets would not appear intrusive from this angle.

The 8m monopole has been highlighted in figure 3 and demonstrates that the existing 8m monopole does not dominate the skyline or views along Chiltern Road. The proposed 20m monopole is over double the height of the existing 8m monopole and is more than double the width of the existing monopole. It is considered that the size and scale of the proposed monopole is such that it would look significantly out of place given the suburban character and appearance of the surrounding area.



Fig 4. Viewing Angle 2, heading north west along Chiltern Road. Photo taken on 29/07/2020.

The existing and proposed equipment cabinets would be clearly visible looking north west along Chiltern Road. At ground level the proposed cabinets are considered to add to the increase street clutter along the grass verge. The size of the proposed H3G Huawei APM5930 cabinet is considered very large at a height of 1.75m and a width of 1.9m given the character and appearance of the street scene. It is considered that while the presence of the proposed cabinets would only be highlighted further against the verdant backdrop of the adjacent foliage. The proposed development would appear out of place given the nearby context.

When compared to viewing angle 1, the proposed 20m monopole would appear more prominent within the skyline given the lower elevation at viewing angle 2. It is considered that given the residential and suburban context of the surrounding area, the proposed development would appear out of place and intrusive. The built environment of the surrounding area is predominately two storey dwelling houses with a maximum height of approximately 8m. The existing 8m monopole is not viewable from a far, given that it respects the height of the built environment of the surrounding area. It is considered that a 20m monopole within 4m of the existing 8m monopole would have a significantly greater impact on the skyline when viewing Chiltern Road from a far.

It is considered that the cumulative impact of all aspects of the development contributes to the view that the siting and appearance of the proposed development is not acceptable. This is in relation to the amount of cabinets proposed and retained on site, the size and location of the proposed cabinets, the 8m decommissioned monopole to be retained and the additional 20m monopole and associated cabinet.



Fig 5. Viewing Angle 1, looking south east along Chiltern Road. Photo taken on 29/07/2020. Note: The contrast of the photo has been increased to more clearly demonstrate the built environment.

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 starts 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

Five alternative sites were presented within the supplementary information provided for this application. These included siting the proposed development at Raglan Gardens, Cawsam Gardens, Valentine Crescent, and Peppard Road.

It was also stated that it had been considered that the existing 8m monopole be redeveloped, however, this option was discarded as it is not a sharable structure and would require significant redevelopment. Another reason that this option was discarded was that the proposed development would be visually intrusive to the street scene by virtue of the width and height of the proposed redevelopment.

The supplementary site information provided for this application indicates that the scheme proposed at Chiltern Road is justified and is the least sensitive location. Comparatively speaking with the alternative sites presented within this application; it is agreed that this option is likely the least sensitive. However, this view is considered as such given the significantly inappropriate siting of the alternative sites.

Transport

The plans indicate that the existing EE/H3G 8.0m High L2 Streetworks pole on root foundation is to be retained and decommissioned. However, the Highway Authority require any redundant mast to be removed. Therefore, RBC Transport required the applicant to submit revised plans illustrating the removal of the decommissioned pole. No revisions have been made.

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.

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	24/07/2020	Case Officer	Agent	Confirmation that prior approval is required for the application. Confirmation of the decision date for the application as 06/08/2020. Stated that case officer would be in touch once with feedback once the application has been discussed with other officers.

Comm. Method	Date	From	To	Details
Email	29/07/2020	Case Officer	Agent	Follow up to email sent on 29/07/2020 expressing the officers views that the application is not considered acceptable with regard to siting and appearance. Provided the option to receive the refusal decision on 06/08/2020 or withdrawn the application.
Email	03/08/2020	Case Officer	Agent	Email sent on 29/07/2020 resent to agent seeking a response
Email	04/08/2020	Agent	Case Officer	Client will reflect on the refusal decision once it has been issued on 06/08/2020.

Conclusion

The siting of the proposed monopole and associated cabinets is not considered acceptable given the suburban setting of the surrounding area. The proposed additional cabinets are considered to add to the existing clutter at the proposal site. The addition of a 20m monopole and the retention of a decommissioned 8m monopole is considered not to respect the visual amenity of the surrounding area.

Reasons for refusal:

1. The proposed 20m high monopole and associated equipment, by reason of its height and bulk, 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).

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 11th June 2020, in respect of the proposed installation of a 20 metre phase 8 pole with wrap around cabinet built around the base, 3no. new equipment cabinets and ancillary development thereto at: Eastern Grass Verge outside 94 Chiltern Road, Caversham, Reading, RG4 5JD, as shown on the submitted drawings and documents:

The agent supplied the following plans:

- 002 Site Location Plan - 1185859_RDG079_10900_RG4655_M001 - Issue A
- 100 Existing Site Plan - 1185859_RDG079_10900_RG4655_M001 - Issue A
- 150 Existing Site Elevation - 1185859_RDG079_10900_RG4655_M001 - Issue A
- 215 Proposed Site Plan - 1185859_RDG079_10900_RG4655_M001 - Issue A
- 265 Proposed Site Elevation - 1185859_RDG079_10900_RG4655_M001 - Issue A
- ICNIRP Certificate
- Supplementary Information Form

These plans were received on 11th June 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 timescale and therefore the decision to refuse the application has been taken.