

DELEGATED APPLICATION REPORT

Ward: Norcot

App Ref: 240340/TEL

Address: Pavement Opp Church End Lane & Norcot Road, Reading, RG30 6BT

Proposals: Application for Prior Notification of proposed development by telecommunications code system operators - Schedule 2, Part 16, Class A of the Town and Country Planning (General Permitted Development) Order 2015. 20 metre mast with associated equipment cabinets.

Case Officer: Steve Vigar

Applicant: Cornerstone

Date received (valid from): 12 March 2023 **Target Decision date:** 7 May 2024

1. SITE DESCRIPTION

The site comprises an area of grass alongside Norcot Road and immediately opposite the junction with Church End Lane. Meadow Park Academy lies adjacent to the site to the north. An area of housing lies to the south and west with a public house, car park and area of woodland to the east.

2. BACKGROUND, PROPOSAL AND SUPPORTING INFORMATION

The proposal is for a 20m tall 5G telecommunications mast and associated cabinets sited within the area of grass between the carriageway and the school.

Plans and Documents Considered:

Site Location Maps 100 Rev.A dated 28 November 2023

Existing Site Plan 200 Rev.A dated 28 November 2023

Proposed Site Plan 201 Rev.A dated 28 November 2023

Existing Site Elevation Rev. A dated 28 November 2023

Proposed Site Elevation Rev. A dated 28 November 2023

ICNIRP Declaration dated 12 March 2024

Cornerstone Industry Site Specific Supplementary Information (England) V.8 - 11.12.2023

Tree Protection Plan 400_A Arbtech TPP 01 dated April 2024, received 12 April 2024

Arboricultural Impact Assessment Arbtech AIA 01 dated April 2024, received 12 April 2024

Arboricultural Method Statement Pavement Opp Church End Lane - Arbtech AMS 01, dated 12 April 2024 received 12 April 2024

3. RELEVANT PLANNING HISTORY

240013/PRE - pre-application enquiry for telecommunications mast (same proposal as current application). The response to this enquiry concluded *"Based on the above assessment it is apparent that the proposed siting and design of the mast would not be acceptable due to its size, unsympathetic design and obtrusiveness resulting in harm to the character and appearance of the area. The proposal is likely to harm the amenity of the adjacent school and give rise to perceived harm on health grounds. It is apparent that alternative sites have not been fully explored or discounted. The opportunities for sympathetic design, camouflage, and smaller more discreet technologies have not been taken. Matters relating to tree protection and*

impacts on wildlife have not been appropriately assessed. Whilst the need for the equipment is not in question in general terms, overall it is considered that this proposal fails in multiple respects and a different approach is required.”

4. CONSULTATIONS

Internal

RBC Natural Environment - No objection to this proposal on the basis of the submitted AIA, AMS and TPP.

RBC Transport - No Objection - “The additional equipment cabinets will not impact on any visibility splays at the junction or reduce the footway width. The proposed equipment would be set back and on the grass verge therefore there would be no Transport objections.”

RBC Ecology - Raise concerns over fragmentation of the Green Link - Policy EN12.

External:

Two site notices were displayed at the site and letters were sent to adjacent occupiers.

One objection was received as follows:

“I respectfully object to this development due to the significant visual impact it will cause and consequently, the reduced desirability of the residential area. There is a local school and residents living within direct view, therefore please consider moving it to an alternative location with this in mind.”

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.

5. Relevant Policies

The application has been assessed against the following policies insofar as they are material to the siting and appearance of the proposed telecommunications equipment:

Reading Borough Local Plan (November 2019)

- CC7: Design and the Public Realm
- CC8: Safeguarding Amenity
- EN14: Trees, Hedges and Woodland
- OU3: Telecommunications Development
- TR3: Access, Traffic and Highway-Related Matters
- EN12 Biodiversity and the Green Network

6. 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.

6.1 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.

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.

6.2 Siting and Appearance - Effect on Visual Amenity

This section of Norcot Road has a notably green and spacious character with extensive grass verges to either side of the road around the junction with Church End Lane. A well-established belt of trees and hedging exists to the boundary of Meadow Park Academy (primary school) which adds positively to this character. This open, green character provides a welcome break between the built-up areas to the east and west when passing along Norcot Road.

An amount of street furniture exists including lampposts, signage, and telegraph poles. These are generally of a narrow diameter and rise to a height which is typical for the area. None appear obtrusive or stand out in the streetscene.

By comparison, the proposed 20 metre tall mast would be substantially taller than existing street furniture and would have a notably wider diameter. This would appear alien in the streetscene and in stark contrast to the existing character. The unattractive, contrived, design of the antenna assembly at the top of the mast would draw the eye and would further compound the obtrusive nature of the proposal.

The mast would rise well above neighbouring vegetation and would be visible in unobstructed views in both directions along Norcot Road; from the elevated viewpoint when approaching from Church End Lane; and from within the adjacent school grounds. The street-level cabinets are large and would add to the obtrusive nature of the proposal taken as a whole.

For these reasons it is considered that the siting and design of the proposal would cause harm to the character and appearance of the area, contrary to the Policy CC7 of the Reading Borough Local Plan 2019 which relates to the character and appearance of development and therefore is material in that regard. The equipment would not be sympathetically designed and camouflaged, contrary to Para 119 of the NPPF 2023.

Siting and Appearance - Camouflage, Sympathetic Design and Alternative Siting

Government guidance (NPPF para 119) also refers to camouflage options. It is clear that the standard 5G mast and cabinets proposed have a stark, functional appearance with little or no regard to its aesthetics or attempt to reduce its visual harm.

In accordance with the sequential approach outlined in the National Planning Policy Framework (NPPF) consideration should always be given to sharing any existing telecommunication structures in the area and using any suitable existing structures or buildings before freestanding ground-based installations are considered.

Similarly Policy OU3 of the Reading Borough Plan (2019) requires that alternative sites and site-sharing options should be investigated fully and that it should be demonstrated that no preferable alternative sites are potentially available which would result in a development that would be less visually intrusive.

Local Plan Policy OU3 requires alternative sites to be investigated. The submitted details include a list of alternative sites, however the reasons given for discounting are brief and not supported by evidence. It is also noted that most are on street and the scope for siting in less obtrusive locations, including on existing buildings, has not been explored.

The applicant makes several references to alternative sites being prominent in relation to residential properties as a reason for discounting these sites. However it is unclear why the selected site does not also raise this concern given that it is highly visible from houses in Norcot Road, Church End Lane and Chichester Road. The particular impact on the school is also not raised as a concern, despite the sensitivity of that land use. Given the limited assessment of alternative sites and supporting evidence in respect of each site, and insufficient information provided to justify the choice of the site and the reasons for discounting alternative sites, it is not possible to assess whether this is the best available option within the area. It would appear that less prominent, less obtrusive sites and less visible within the environs of the school and away from the busy main routes of Norcot Road and Church End Lane would exist within the search area.

In view of this, it is considered that the assessment of possible alternatives with reduced visual impact have not been properly and robustly reviewed and discounted by the applicant in line with guidance contained within the NPPF. This therefore forms a reason for refusal.

6.5 Health, Amenity and Perceived Harm

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 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.

However Para 121 of the NPPF 2023 requires applications to be supported by evidence of the outcome of consultation with nearby schools. It is noted that the submitted documents refer to the need to avoid visibility from residential property in order to safeguard the amenity of residents. It stands to reason that similar care should be taken to minimise visibility from other sensitive neighbouring uses such as schools. In this instance the proposed site is immediately adjacent to a school boundary and would involve a tall, visually obtrusive structure which would be readily visible from the playground, sports field and south-facing windows of Meadow Park Academy. Although no representations have been received from the school, it is considered that the proposal would be overbearing and somewhat aggressive in appearance, resulting in harm to the amenity of the school site. It is also likely to give rise to concern and a *perception* of harm from users of the school on health grounds due to the particularly close proximity, size and prominence of the mast and the sensitive nature of this neighbouring land use. The proposed siting and design is considered to be unacceptable on these grounds.

7. Conclusion

Whilst the proposed development benefits from permitted development under Article 3 in Schedule 2, Part 16, Class A of the Town and Country Planning (General Permitted Development) Order 2015, the prior approval of the local planning authority required in terms of the siting and appearance of the development. The proposal has been assessed in terms of siting and appearance and has been found to conflict with Local and National Policy guidance as such the development is recommended to be **REFUSED**.

Recommendation

PRIOR APPROVAL REFUSED

Reasons for Refusal:

1. The proposed 20m high 5G telecommunications mast and its associated cabinets, by reason of their design, height, bulk and siting at a prominent location, would 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. 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, including when viewed from the neighbouring school. As such the proposal is contrary to Policy OU3 of the Reading Borough Local Plan (2019) and the NPPF (2021).

Informatives:

IF0: Positive and Proactive Working - refusal

The Local Planning Authority has worked positively and proactively with the applicant at pre-application stage to see if relevant concerns could be resolved to allow permission to be granted. However, that has not been possible within the prescribed target and therefore the decision to refuse planning permission has been taken.

I00: Plans

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

Site Location Maps 100 Rev.A dated 28 November 2023

Existing Site Plan 200 Rev.A dated 28 November 2023

Proposed Site Plan 201 Rev.A dated 28 November 2023

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