

**COMMITTEE REPORT**

**BY THE DIRECTOR OF ENVIRONMENT & NEIGHBOURHOOD SERVICES  
READING BOROUGH COUNCIL  
PLANNING APPLICATIONS COMMITTEE: 29 April 2020**

**Ward:** Southcote

**App No.:** 200339/FUL

**Address:** Burghfield Road Southcote

**Proposal:** Removal of the existing 15m mast and erection of a new 25m lattice tower with a total of 12No. antenna (6No. EE and 6No. Huawei) along with ancillary equipment mounted on a newly formed concrete foundation measuring 5.5m x 5.6m. The existing site compound would be retained and enlarged by a further 6.6m to an overall size of 13.2m x 6.6m all enclosed by a 2.5m high Palisade fence to match that of the existing

**Applicant:** Wireless Infrastructure Group

**Date validated:** 2 March 2020

**8-week target decision date:** 27 April 2020

**RECOMMENDATION**

Grant Full Planning Permission

**CONDITIONS TO INCLUDE**

1. Full - time limit - three years
2. Standard approved plans condition
3. Removal of existing monopole

**INFORMATIVES TO INCLUDE**

1. Standard positive and proactive informative.
2. Terms & conditions
3. Highways works

**1. INTRODUCTION**

- 1.1 The application site is located to the south of the existing SSE electricity sub-station, adjacent to the main access for the site on the west side of Burghfield Road and contains an existing 15m high telecommunications monopole with antennas and ground based ancillary equipment cabinets surrounded by a metal palisade fence. The site is located approximately 800m south of the A4 Bath Road and about 150m north of the boundary with West Berkshire District. The substation site is in an open agricultural area 200m north-east of Holybrook Farm. The River Kennet is located around 300m to south of the site with an industrial estate located directly to the south of the river channel. The nearest residential dwellings are in Lea Close some 140 metres north of the site with a brook, railway tracks and Southcote Linear Park in between.

- 1.2 The site is set below the ground level of Burghfield Road, behind an embankment to the east as Burghfield Road rises up to the north to the bridge over the railway line. That embankment is vegetated by a hedgerow of up to 10 metres in height. Taller trees of around 12-18 metres in height are located further to the north east and west.
- 1.3 There is an existing 16m high lattice telecoms tower located some 175m to the south west of the site just north of Holy Brook Farm.
- 1.4 Immediately to the north within the sub-station site are transformers and a single storey control building, this is bordered to the north by a raised (3 metres high) railway track. Further north is Holy Brook itself, then extensive mature planting and an open field. The substation site is located within and on the western edge of the Kennet and Holy Brook Meadows Major Landscape Feature Area which extends to the east and north of the site. Southcote Linear Park area of Local Green Space is also located around 100m to the north of the site on the north side of the railway line.



*Site Location Plan*



*Existing monopole*

- 1.5 The existing 15m high telecommunications monopole was originally refused by Planning Applications Committee in 2005 under telecommunications prior approval application ref. 050068. The application was refused on the grounds of siting and appearance with the monopole considered to be a harmful and dominant structure in the local area, particularly when viewed from Southcote Linear Park and Lea Close to the north. A second reason for refusal regarding failure to demonstrate that there was not an alternative more suitable site for the monopole that in the local area that would have a lesser visual impact was also applied.
  - 1.6 However, this proposal was allowed by the Planning Inspectorate on appeal (ref. APP/E0345/A/05/1183889). In allowing the appeal, the Inspector acknowledged the site's sensitive location but only identified limited harm to the character and appearance of the surrounding area and concluded that the benefits of the monopole in providing improvements to network coverage for nearby residential areas would outweigh this harm. The Inspector was also satisfied that alternative sites had been satisfactorily investigated.
  - 1.7 The current application is on the committee agenda because the Council's scheme of delegation requires all applications for new/replacement telecommunications masts to be determined by Planning Applications Committee.
- 2. PROPOSAL**
- 2.1 The application seeks full planning permission to replace the existing 15m high and 0.5m wide telecommunications monopole with a new 25m high 'lattice' tower of between 1.2m and 1.8m in width, with a total of 12No. antennas (6No. EE and 6No. Huawei) and 4No. EE 600mm diameter dishes. The antennas would be located at the top of the mast and would have a

maximum width of 4.4m. The proposed lattice tower would be mounted on a newly formed concrete foundation measuring 5.5m x 5.6m located to the north and directly adjacent to the existing concrete base and monopole. As a replacement scheme, the existing monopole is to be removed as part of the proposals. The existing site compound would be retained and enlarged by a further 6.6m to an overall size of 13.2m x 6.6m all enclosed by a 2.5m high Palisade fence to match that of the existing. The existing concrete base would be retained to house the 6No. new ground-based equipment cabinets (for EE/H3G).

- 2.2 The proposed upgrade of the existing established telecommunications base station and the proposed lattice tower would host EE Ltd, who require this larger tower due to the height of the surrounding clutter between the site location and the cell coverage area, in order to provide improved coverage to existing customers. The tower would continue to provide 2G, 3G and 4G coverage for EE's customers within this area providing them with mobile, voice, text and data services, as well as being optimised to include the upgrade of 5G equipment. The tower would also provide opportunity for additional operators to site share in the future, reducing the number of masts within the locality as well as providing improved coverage for the emergency services network(s).
- 2.3 A declaration has been submitted by the applicant confirming compliance with the International Commission on Non-ionizing Radiation (ICNIRP) guidelines.

### **3. PLANNING HISTORY**

- 3.1 Electricity substation permitted in 1960 and an extension to the control building was also permitted in 1998.
- 3.2 04/00113/TELE - 15 metre pole with 4 x antennas, 2 x 600 mm dishes radio equipment housing and ancillary development - Refused.
- 3.3 04/00755/TELE - Installation of a telecommunications pole with antennas, radio equipment housing and ancillary development - Withdrawn.
- 3.4 050608/TELE - Provision of a 15m monopole and a ground based equipment cabinet - Refused. Allowed on appeal (ref. APP/E0345/A/05/1183889).

### **4. CONSULTATIONS**

- 4.1 RBC Natural Environment - Notes that that the existing trees along the Burghfield Road boundary are fairly small and doesn't envisage that the extension of the concrete base will be harmful in this respect.

The key point is the extension of height from a 15m mast to a 25m tower, which is significant. This will take the tower above the height of adjacent trees and increase its visibility from the surrounding area, including the road and adjacent Local Wildlife sites. Notes that only an elevation has

been submitted just to show what the tower will look like whereas it would seem appropriate that visuals from further afield should be provided in respect of the requirements of Policy OU3 and the impact of telecommunications development on the visual amenity of the surrounding area.

Objects to the application on the basis that it fails to demonstrate that the replacement tower would not have an unacceptable impact on the surrounding landscape and Major Landscape Area.

4.2 RBC Transport - No comments received at time of writing this report.

4.3 RBC Ecology - No comments received at time of writing this report.

4.4 Berkshire Archaeology - The proposed new telecommunications tower lies immediately adjacent to an existing facility that was subject to an archaeological watching brief in 2004 (Thames Valley Archaeological Services, 2006). The watching brief did not identify any remains of archaeological significance.

On the basis of the results of the earlier watching brief and in view of the small area of below ground impact for the current proposal, an archaeological response would not be proportionate and therefore no further action is required in relation to the buried archaeological heritage. No objection.

4.5 West Berkshire Council - No comments received at the time of writing this report.

#### Public Consultation

4.6 No. s 71-109 Brunel Road and no.s 14-35 Lea Close were notified of the application by letter. A site notice was not displayed.

4.7 One letter of objection has been received raising the following comments:

- *There have been numerous reports regarding the introduction of 5g rollout some in favour but the majority against. Until a comprehensive review is carried out regarding this rollout of the 5g network it should not be installed. The installation of this 5g network without the proper safety reviews being carried out would be a flagrant abuse of our basic human rights and an abuse of the duty of care towards the population in the close proximity to this mast.*

4.8 If any further representations received these will be detailed in an update report or reported verbally at the committee meeting.

## **5. RELEVANT PLANNING POLICY AND GUIDANCE**

5.1 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'.

5.2 Full Planning Permission has been applied for as the development exceeds permitted development rights under Class A, Part 16 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended). Full Planning Permission has been applied for as the development exceeds permitted development rights under Class A, Part 16 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended). This is because the width of the proposed tower exceeds that of the existing monopole by more than a third. It should be noted that a replacement mast of 25m in height could be erected under permitted development rights as long the width of the mast did not exceed this requirement; albeit any such proposal would still be required to go through the prior approval process where the LPA would be required to assess the visual impact of the mast on the surrounding area and either give or refuse prior approval.

5.3 The following local and national planning policy and guidance is relevant to this application:

5.4 National Planning Policy Framework 2019

Part 10 - Supporting high quality communications infrastructure

Part 12 - Achieving well designed places

Part 15 - Conserving and enhancing the natural environment

5.5 Reading Borough Local Plan 2019

Policy CC7 Design and the public realm

Policy EN7Wr Southcote Linear Park Local Green Space (LGS)

Policy EN8 Undesignated Open Space

Policy EN12 Biodiversity and the green network

Policy EN13 Major landscape features and Areas of Outstanding Natural Beauty

Policy EN14 Trees hedges and woodlands

Policy EN16 Pollution and water resources

Policy TR3 Access, traffic and highway related matters

Policy OU3 Telecommunications development

## 6. APPRAISAL

6.1 Paragraph 112 of the NPPF 2019 sets out that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Paragraph 113 states that the number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged.

- 6.2 Policy OU3 of the Reading Borough Local Plan 2019 states that 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 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.

*Impact on Visual Amenity*

- 6.3 Paragraph 170 of the NPPF sets out that planning decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value commensurate with their statutory status or identified quality in the development plan) as well as recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services - including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.
- 6.4 In addition to Policy OU3 as set out above Policy CC7 (Design and the Public Realm) seeks that all development is of high design quality which maintains and enhances the character and appearance of the surrounding area with respect to issues such as scale, height, massing and landscape impact. Policy EN13 (Major Landscape Features and Areas of Outstanding Beauty) also sets out that planning permission will not be granted for development which would detract from the character or appearance of a Major Landscape Feature. Policy EN8 (Undesignated Open Space) requires that there is a presumption in favour of retention of undesignated open space. Policy EN7 (Local Green Space and Public Open Space) requires that development does not result in loss of or jeopardise public enjoyment of designated Local Green Spaces (LGSs).
- 6.5 The proposed replacement lattice tower and associated equipment would be located within the confines of the existing substation site; therefore, no loss of undesignated open space will occur. The substation site is located over 100m south of Southcote Linear Park such that there would be no loss of this designated LGS. Furthermore, this separation is such that the proposed development is not considered to jeopardise the use or enjoyment of this LGS.
- 6.6 The lattice tower structure (including antennas and dishes at the top of the tower) is the only element of the proposal that is considered to be visible to a level that could be considered discernible from public vantage points, with the proposed extended concrete base and 6 ground level equipment cabinets and palisade fencing being screened to longer range

views by existing vegetation and the change in levels between the substation site Burghfield Road to the east.

- 6.7 The key assessment is the impact of the increase in height, width and change in form of the replacement lattice tower upon the character and views within the surrounding area and Kennet and Holy Brook Major Landscape Feature compared to the existing 15m high monopole.
- 6.8 The existing monopole, whilst partially screened by the existing hedgerow and trees surrounding the substation site, is visible to immediate views from Burghfield Road and the surrounding countryside particularly views north towards Southcote and west and east across the site. The existing vegetation screening is most effective in screening views south from Southcote towards the countryside where the existing tree lines largely obscure the monopole, albeit the antenna to the top of the monopole is still visible. The existing monopole is also evident in longer range views from the wider countryside and from within the Major Landscape Feature Area to the east and north of the site.
- 6.9 Officers requested a views assessment of the impact of the increased height of the structure upon the surrounding area from the Applicant given the site's sensitive location, however this has not been provided. The Council's Natural Environment Officer also considers that such an assessment is necessary to properly assess the impact of the development of the surrounding area and Major Landscape Feature. Given the absence of this assessment from the application documentation, the Natural Environment Officer has raised objection to the proposed development on the basis that the application fails to demonstrate that the increased height and width of the telecommunications tower would not detract from the visual amenity of the surrounding area and the character and appearance of the Major Landscape Feature.
- 6.10 However, notwithstanding the above officers must assess the application and proposed development based on the plans and documentation that have been submitted.
- 6.11 At 10m taller than the existing monopole, the proposed replacement 25m high lattice tower would clearly be more a more visible and prominent structure. In terms of appropriate design, the lattice style structure, whilst wider, would present a more lightweight appearance than a solid monopole. The existing vegetation and trees, none of which are to be removed as part of the proposals, would screen the lower parts of the tower to some immediate and long-range views as with the existing monopole. However, the increased height would project up above the surrounding tree line making it visible to wider range of views whilst the bulky antennas and dishes to the top of the mast would increase its visual prominence, negatively affecting views from the Kennet and Holy Brook Meadows Major Landscape Feature and Southcote Linear Park Local Green Space. This would be particularly evident looking south across the site from Southcote towards the open countryside, where the existing monopole is most effectively screened by trees and vegetation.

- 6.12 There is an existing telecommunications lattice tower located around 100m to the south in open countryside just north of Holy Brook Farm. This structure is 16m in height and therefore would not provide the necessary height to provide the network coverage sought by the lattice tower proposed as part of this application. In considering the visual impact on the wider area officers accept that it is preferable for a taller lattice tower, such as that proposed, to be located within an existing large substation site which is already established within the countryside, rather than an isolated site such as that near Holy Brook Farm in the middle of green fields. Albeit it is acknowledged that the re-use of an existing site does not diminish the impact of the increased height.
- 6.13 Based on the information provided, Officers conclude that the proposed larger replacement telecommunications lattice tower, antennas and dishes would result in a development which detracts from the amenity and character of the surrounding area both in terms of immediate and long-range views from within the surrounding countryside and Major Landscape Feature. However, taking into account that the application relates to an existing telecommunications base station site within an established electricity substation which is encouraged by the NPPF and Policy OU3, as well as the existing presence of the monopole to be removed, the degree to which the development detracts from surrounding character must be considered against the positive benefits of the telecommunications development.

#### *Alternative Sites*

- 6.14 The proposal would accord with the requirements of the Paragraph 1115 of the NPPF and Policy OU3 in that the works propose an upgrade to an existing telecommunications base station as opposed to creating a new base station in an alternative and non-established location. Whilst not currently proposed as a site share between different telecommunications operators, the application makes clear that the size and location of the mast mean that it is suitable and would be available for share with other operators which could avoid the need for the installation of another mast elsewhere within the Borough or creation of a new base station site that is not in an established location.
- 6.15 The supporting information submitted with the application does not explore alternative locations for the tower on the basis that the proposed works relate to an upgrade of an existing base station and therefore the principle of telecommunications apparatus on the site is already established. Whilst the proposals do relate to upgrade of an existing site this does not mean that alternative locations should not be considered, particularly those which could potentially have a lesser visual impact. However, in this instance given the open character of this part of the borough and the scale of the mast required to provide the necessary level of network coverage for residents and the emergency services network, Officers are of the opinion that less exposed sites locations are likely to be difficult to identify and therefore re-use and upgrade of an existing

established site is the preferred approach. Furthermore, the character of the built-up areas of this part of the Borough do not include particularly tall buildings where there could be potential for provision of alternative roof-based equipment as opposed to ground-based monopoles/towers.

#### *Other*

- 6.16 Paragraph 116 of 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 requirement is also outlined in the supporting text to Policy OU3.
- 6.17 The applicant has provided an International Commission on Non-ionizing Radiation (ICNIRP) certificate to support this planning application. This certifies that the proposed development would be in full compliance with the ICNIRP guidelines. The ICNIRP guidelines are the most up-to-date and relevant tool to ascertain the acceptability of telecommunications development within the planning process. Paragraph 116 of the NPPF goes on to state that Local Planning Authorities should not substitute their own "opinion" on health issues for that expressed by ICNIRP.
- 6.18 On balance, the suggested health risks associated with this development (as raised by the objector) 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 proposal is deemed acceptable in terms of health-related issues.
- 6.19 No audible noise is anticipated from the structure. The surrounding area receives audible noise from vehicles, trains and a constant low hum from the substation. Consequently, there will be no adverse effects.
- 6.20 The tree officer is satisfied that the proposed position of the extended concrete base and its location within an established substation is such that the proposals would not result in any detrimental impact to existing trees and vegetation. Comments from the Council's Ecologist will follow in an update report or be reported verbally at the committee meeting.
- 6.21 Berkshire Archaeology raises no objection to the proposals on the basis that the site is located within an established base station site such that archaeological implications would be limited.
- 6.22 In terms of transport impacts the substation site has its own existing access such that construction works will be able to take place away from the highway. However, any more detailed transport comments will be provided in an update report or reported verbally at the committee meeting.

#### *Matters raised in representations*

- 6.23 The issues relating to the health impact of the proposals have already been addressed in paragraphs 6.16 to 6.18 of this report.
- 6.24 However, the objector also raises the matter the impact of the perceived health effects of the development upon their Human Rights. Article 8 of the Human Rights Act (HRA) relates to enjoyment by residents of their home life. The grant of planning permission for development which may have sufficiently serious effects on the enjoyment by local residents of their home life may in principle affect Article 8, although such cases are likely to involve extreme facts. In addition, Article 8(2) allows public authorities to interfere with the right to respect the home if it is “in accordance with the law” and “to the extent necessary in a democratic society” in the interest of “the well-being” of the area.
- 6.25 Under S.70 of the 1990 Planning Act, Parliament has entrusted planning authorities with the statutory duty to determine planning applications, and has said (S.70(2)) that in dealing with such an application the authority “shall have regard” to the development plan and to “any other material considerations” which will include HRA issues.
- 6.26 The courts have held that a “balance” has to be struck in planning decisions between the rights of the developer and the rights of those affected by the proposed development. This involves the balance between:
- on the one hand the specific interests of the individual objector as documented (see above), and
  - on the other hand, the interests of the applicant to obtain the planning permission he has applied for, and lastly
  - the interests of the wider community, as expressed in Lough (2004) in the following terms “in an urban setting it must be anticipated that development may take place” and that it “is in the public interest that residential developments take place in urban areas if possible”.
- 6.27 In this respect the applicant has applied for planning permission for the development as required by planning legislation. As referred to in paragraphs 6.16 to 6.18 of this report above, the NPPF is clear that for telecommunications development LPAs should not substitute their own opinion on health matters where a development demonstrates that it is meeting ICNIRP guidelines which are the internationally set guiding principles for such matters. An ICNIRP certificate demonstrating adherence to these guidelines has been submitted by the Applicant as part of the application as required. Officers therefore consider that the development would not conflict with the HRA.

#### *Equalities impact assessment*

- 6.28 In determining this application the Committee is required to have regard to its obligations under the Equality Act 2010. The key equalities protected characteristics include age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief,

gender/sex, or sexual orientation. There is no indication or evidence (including from consultation on the application) that the protected groups have or will have different needs, experiences, issues and priorities in relation to the particular planning application. In terms of the key equalities protected characteristics it is considered there would be no significant adverse impacts as a result of the development.

## **7. CONCLUSION**

- 7.1 It is considered that the benefits of the proposed development in providing improved network coverage for nearby residents and the emergency services network, together with the fact that the proposals are for an upgrade of an existing telecommunications base stations and are designed to be shared with other operators therefore reducing the potential for new telecommunication base stations and masts to be established elsewhere in this locality, are considered to outweigh the extent to which the increased height of the mast would detract from the visual amenity of the surrounding area and the character of the Kennet and Holy Brook Meadows Major Landscape Feature.
- 7.2 The proposals are considered to accord with Policies CC7, EN7Wr, EN8, EN12, EN13, EN14, EN16, TR3 and OU3 of the Reading Borough Local Plan 2019 and the National Planning Policy Framework 2019 as assessed above. It is therefore recommended that approval be granted, subject to suitable conditions.

### Drawings and Documents Considered:

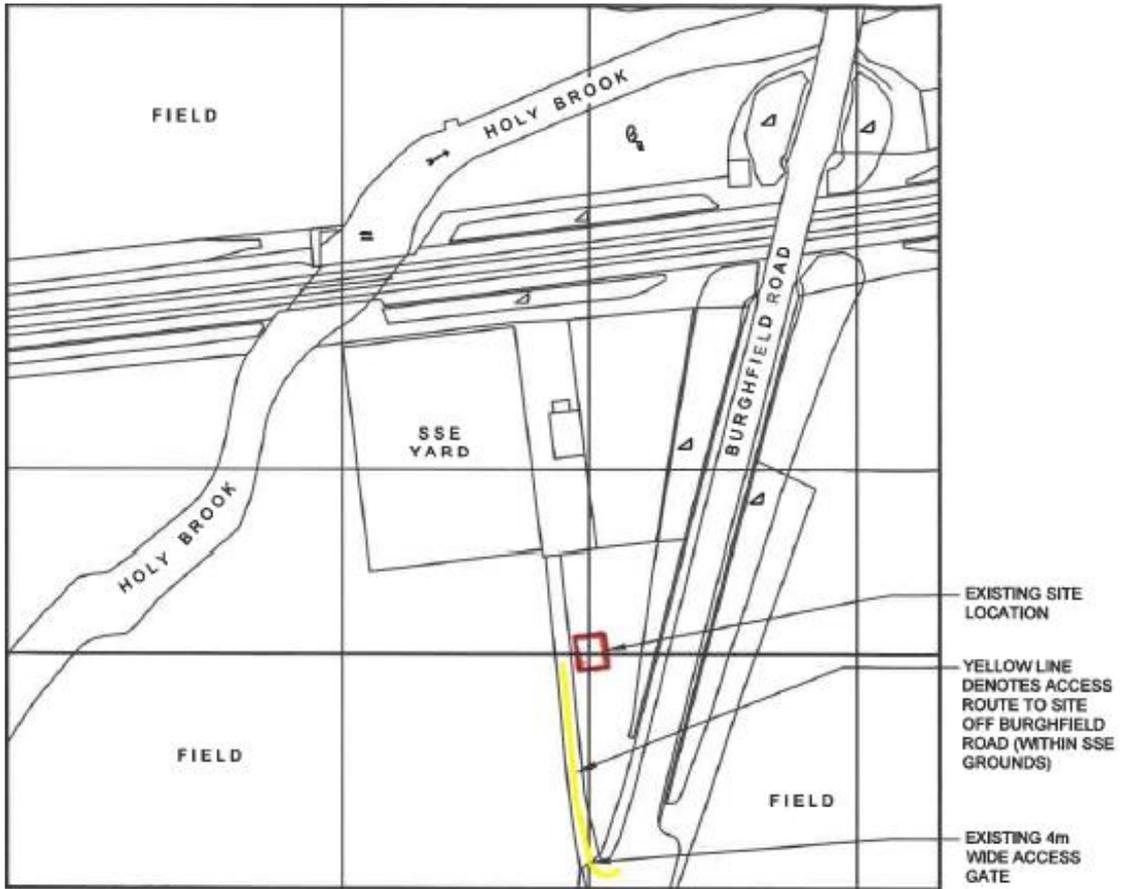
Drawing no 100 rev E - Location and block plans  
Drawing no 101 rev E - Crane/cherry picker location plan  
Drawing no 102 rev E - Existing site plan - ground level  
Drawing no 103 rev E - Existing site elevation  
Drawing no 104 rev E - Proposed site plan - ground level  
Drawing no 105 rev E - Proposed site elevation  
Drawing no 107 rev E - MBNL headframe plans

ICNIRP declaration certificate

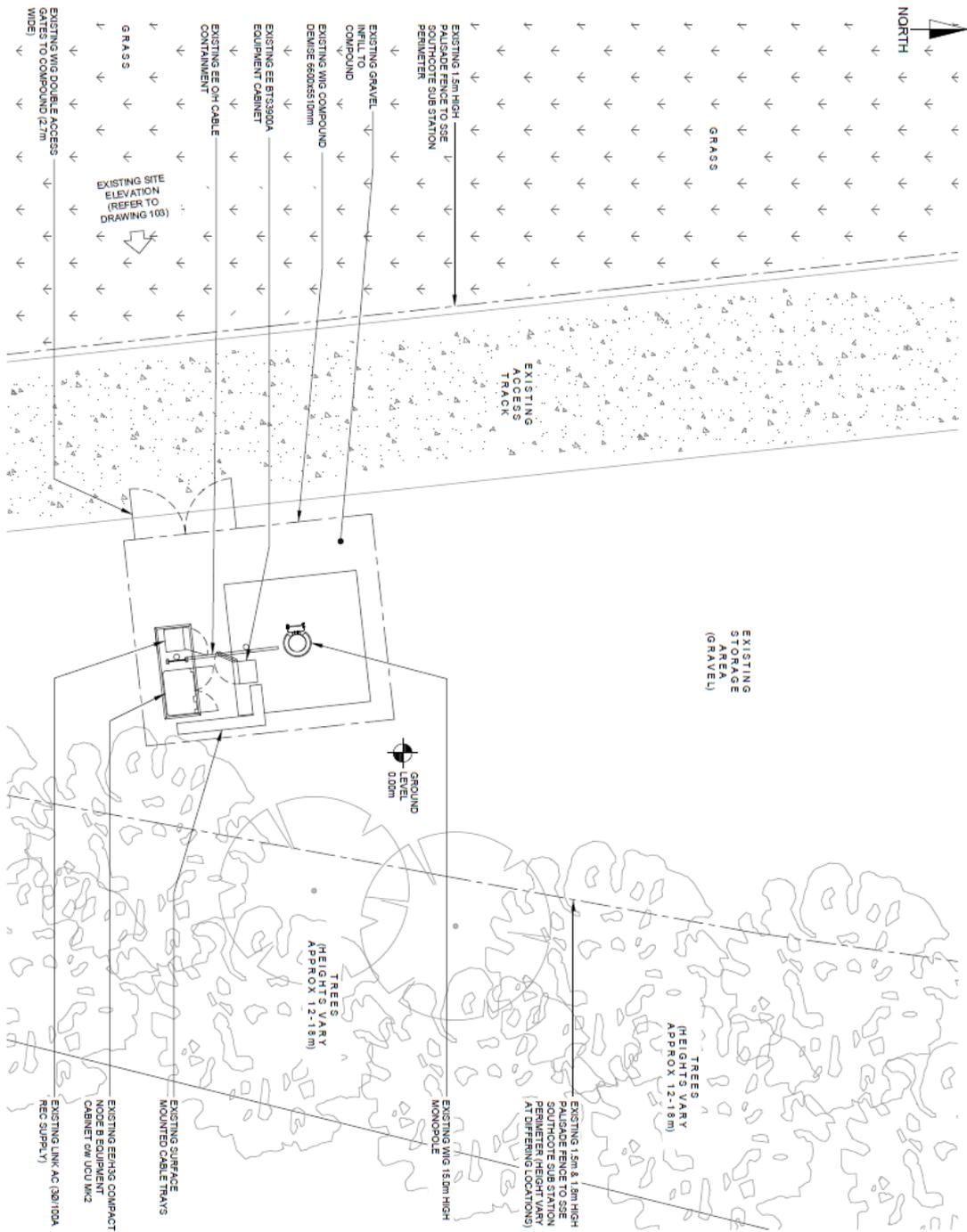
Harlequin group supporting statement rev 1

**Case Officer: Matt Burns**

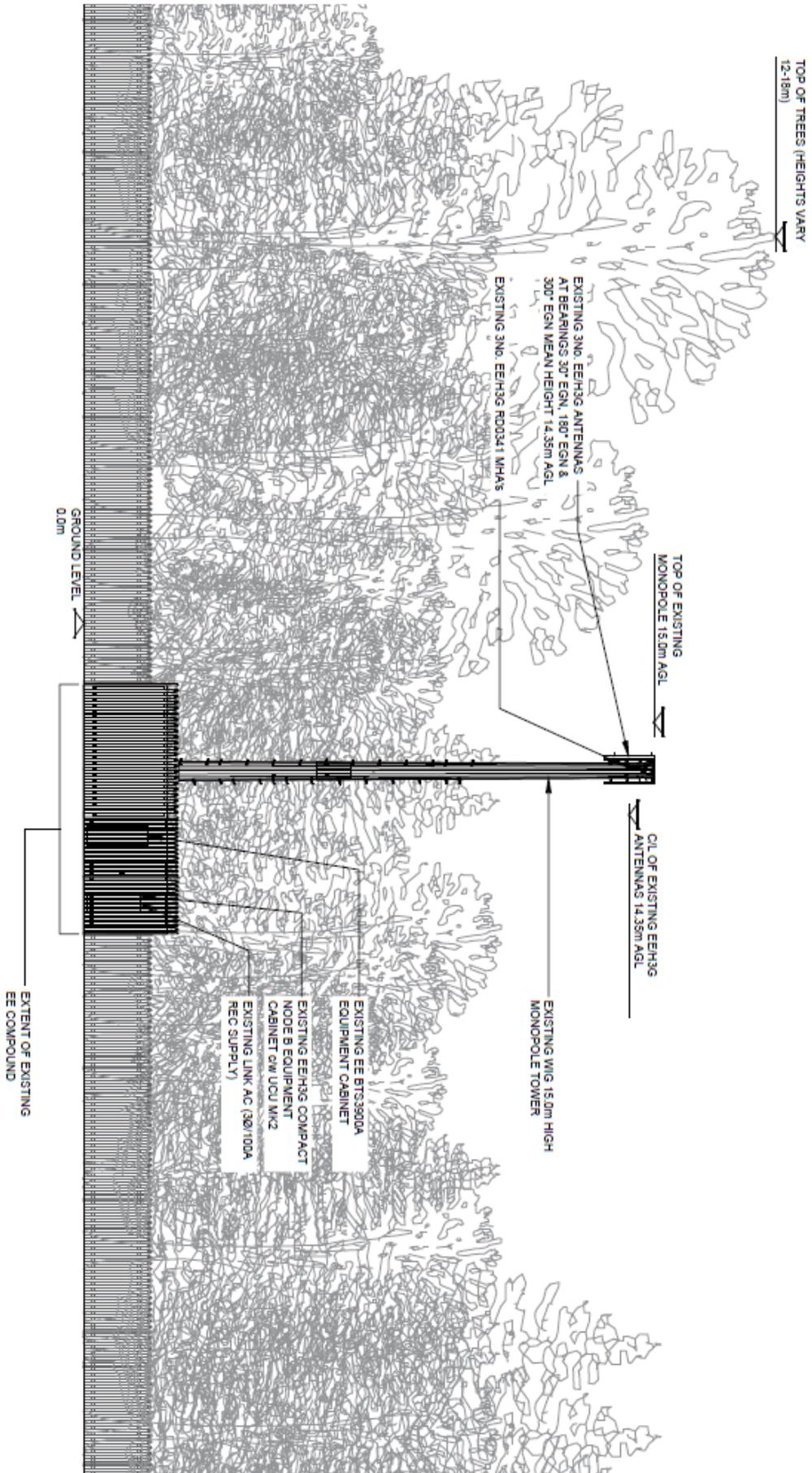




Site Plan

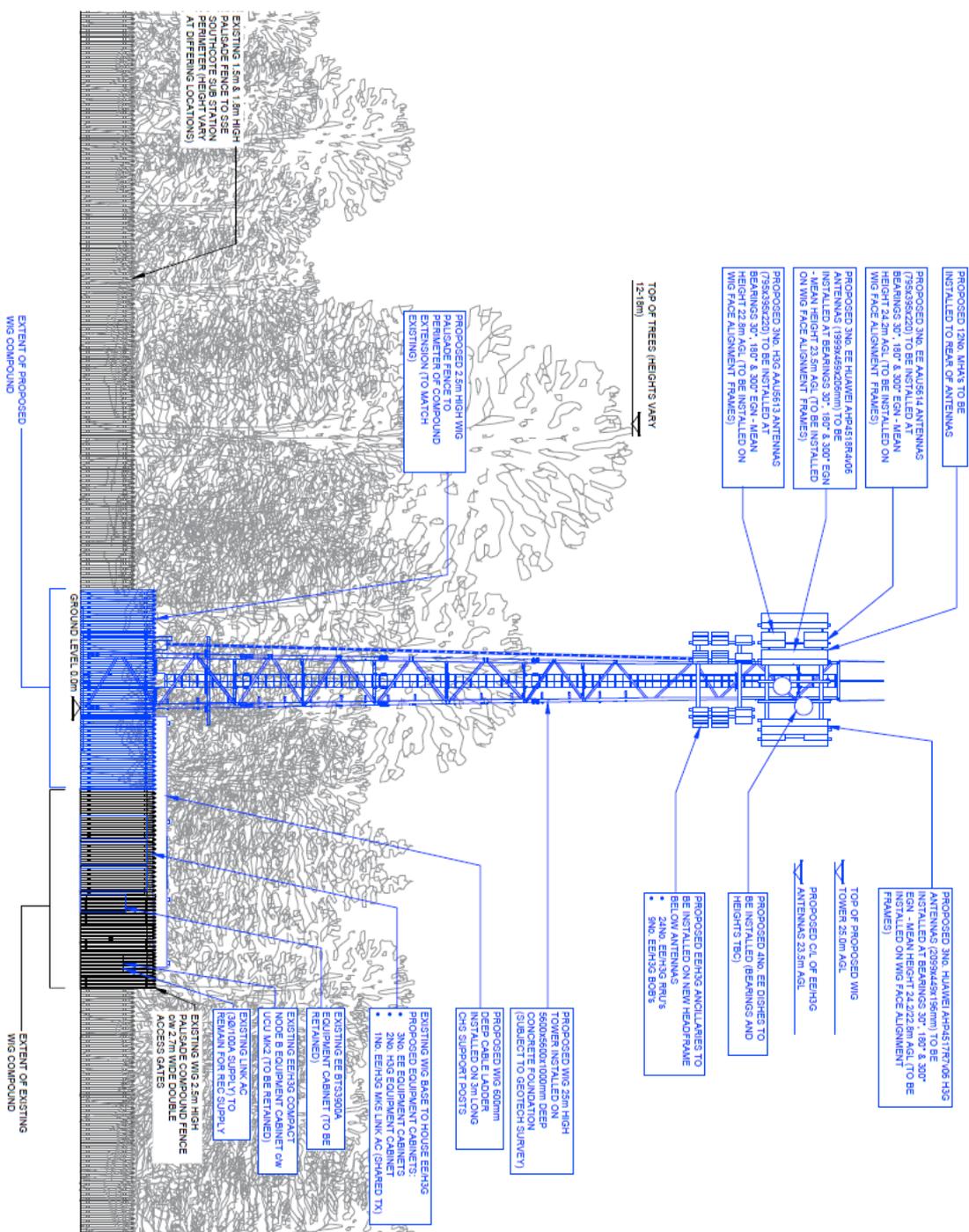


Existing Site Plan

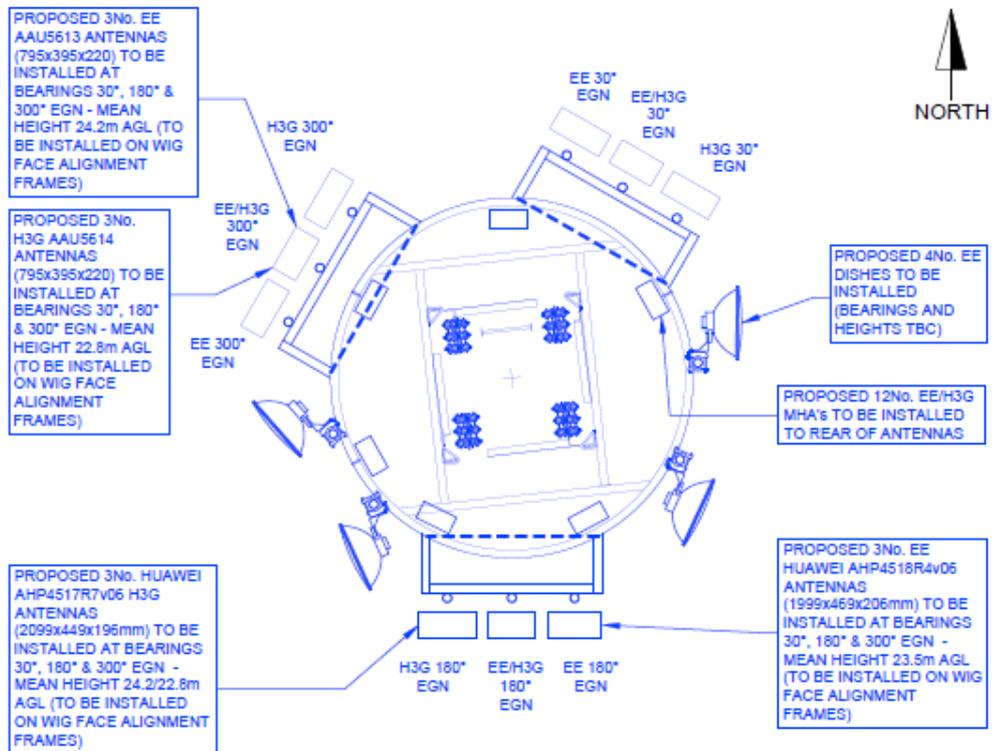


Existing Elevation

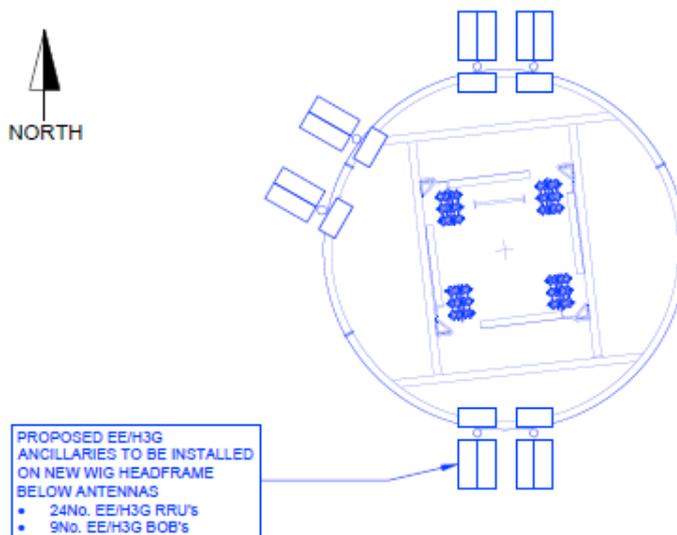
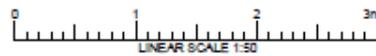




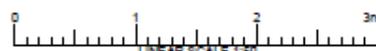
Proposed Elevation



**PROPOSED EE/H3G ANTENNA PLAN AT 23.5m AGL**



**PROPOSED EE/H3G ANCILLARY PLAN**



Proposed Headframe Section