

WA/2024/00035 – Installation of a 20m high monopole supporting 3 no. antennas, 2 no. 0.3m dishes, 6 no. luminaires, new 1.8m high mesh fencing and associated apparatus and ancillary works. at GODALMING TOWN FOOTBALL CLUB MEADOW GODALMING

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

Case Officer: Sam Wallis

Neighbour Notification Expiry Date: 29/01/2024

Expiry Date/Extended Expiry Date: 07/06/2024

Committee Meeting Date: 05/06/2024

RECOMMENDATION That, subject to conditions, permission be **GRANTED**

1. Summary

The application has been referred to Committee as there are 101 letters of objection.

The application seeks permission for the installation of a 20m high telecom monopole with ancillary telecom equipment to replace a recently removed 18m monopole, six floodlights to serve the Godalming Football Club and 1.8m high mesh fencing. The monopole and antennas alone fall within permitted development under Part 16 of the GDPO the installation of lighting requires planning permission. The proposed works are intended to upgrade this existing telecommunications site. Officers consider the proposal is acceptable with regards to the impact on the Green Belt, design and visual amenity, residential amenity and other related matters.

The planning balance assessment concludes that the proposal is in accordance with the Development Plan, as such, planning permission is recommended for approval.

2. Site Description

The application site is part of Godalming Football Club and consists a fenced area that previously housed a 18m telecom tower and associated equipment on the south-eastern edge of Godalming Football Club. The site is located beside Guildford Road and Broadwater Park. The previous monopole was removed around 2022 due to overloading concerns.

3. Proposal

The application seeks permission for:

- The installation of a 20m high monopole to replace the recently removed 18m high monopole which supported the operator's infrastructure. The proposed structure has an overall height of 20m and will support 3x antennas, 2x dishes and 6x luminaires floodlights and will be sited adjacent to the siting of the original pole with additional ancillary development within an enlarged fenced area. The enlarged area will be enclosed by a 1.8m high meshed fence.

4. Relevant Planning History

Reference	Proposal	Decision
NMA/2023/02329	WA/1991/0382 To change the existing metal halide floodlight luminaires to modern LED luminaires Better for the environment More modern equipment that is still supported as metal halide bulbs are no longer supported by manufacturers	NON MATERIAL AMENDMENT ALLOWED (20/11/2023)
WA/2000/0097	Variation of Condition 1 of WA91/0382 to allow the use of floodlights for a longer period on limited occasions.	GRANTED (07/04/2000)
WA/1991/0382	Erection of four floodlight pylons	GRANTED (12/06/1991)

5. Relevant Planning Constraints

- Green Belt (outside defined settlement area)
- Flood Zone 2 / 3
- Setting of Grade I Listed Almhouses, Grade II Listed boundary wall and Grade II Listed Meads Cottage
- Potentially Contaminated Land

6. Relevant Development Plan Policies and Guidance

- Waverley Borough Local Plan (Part 1): Strategic policies and sites (adopted February 2018): SP1, TD1, NE2, RE2,
- Godalming Neighbourhood Plan (made August 2019): GOD5, GOD6
- Waverley Borough Local Plan (Part 2) (adopted March 2023): DM1, DM2, DM5, DM14, DM30

Other guidance:

- The National Planning Policy Framework 2023 (NPPF)
- The National Planning Practice Guidance 2014 (NPPG)

7. Consultations and Town Council Comments

None received.

8. Representations (as of 14/03/2024)

101 letters have been received raising objection on the following grounds:

Health Concerns

- Proximity to residential area is below the ICNIRP guidelines of no residences within 50m.
- Recommendation of a 500m exclusion zone.
- Risk of radiation.

- The action of RFR in the body is unpredictable when there are metal implants present.
- The ICNIRP declaration is from a dissolved company.
- Studies on 5G have not considered impact on children or elderly.
- Development too close to nursery and care home.
- Would harm people who suffer from electro-hypersensitivity.

Appearance

- Design is incongruous with tranquil landscape setting.
- Height and form is unattractive and overbearing.
- Close in proximity to Grade I-listed Almhouses.
- Impact on mature trees fronting Maedrow.
- Many alternative locations better suited away from residential development

Other Matters

- No need for 5G mast as current 4G service is good
- Impact of light pollution from floodlights
- No consideration as site is within Flood Zone 2/3
- Impact on biodiversity
- Lack of consultation with community.
- Devalue property prices in the area.
- Contravenes climate policies.
- No previous planning history for the telecom tower.
- Sited on contaminated land.
- Inaccuracies in application form.

15 letters have been received expressing support for the following reasons:

- Need for 5G infrastructure in Godalming.
- Essential in age of home-working to improve telecoms infrastructure.
- Current signals and connection in the area are poor.

Planning Considerations:

9. Principle of development

The application has been submitted in full due to the installation of the luminaires (floodlights) on the monopole, the monopole and antennas alone fall within permitted development under Part 16 of the GDPO therefore the principle of the monopole is acceptable, consideration must be given to the floodlights and fencing.

Officers note the large amount of objections in relation to health and safety of the proposal, specifically that 5G networks are unsafe.

The NPPF is clear in that it supports high quality communication infrastructure, given that it is essential for sustainable economic growth. Paragraph 118 of the NPPF states that: “Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections”.

Paragraph 121 of the NPPF advises that applications for telecommunications development (including for prior approval under the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development.

Paragraph 122 of the NPPF requires Local Planning Authorities to determine applications on planning grounds only. 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. Officers would also highlight that the development of the telecom tower would usually benefit from

10. Impact on the Green Belt

The site is located within the Green Belt outside any defined settlement area. Policy RE2 of the Local Plan (Part 1) 2018 outlines that the Green Belt will continue to be protected from inappropriate development. Inappropriate development will not be permitted unless very special circumstances can be demonstrated.

Certain forms of development are considered to be appropriate, and will be permitted provided they do not conflict with the exceptions listed in paragraphs 154 and 155 of the NPPF.

As already established the monopole does not require planning permission the floodlights attached to the monopole do, the new mesh fencing is under 2m and therefore would also be permitted development. Officers consider Paragraph 154 (d) would apply.

The fixture of luminaires onto the monopole would replace existing lighting that was present on the previous tower. The additional fencing would only involve a slight extension to the south-west to encompass the concrete base. Ancillary development included cable tray, feeder duct and power ducts would also be well related and within existing fenced areas so not to impact upon openness.

For the reasons stated above, it is considered that the proposed development would comply with the exception as stated under paragraph 154 (d) of the NPPF and no concerns are raised regarding Policy RE2 of the Local Plan (Part 1) 2018 and Policy DM14 of the Local Plan (Part 2) 2023.

Policy DM30 of Part 2 of the Local Plan is relevant, the policy recognises the importance of the improving the coverage and quality of mobile phone services particularly for rural enterprises. Resilient telecommunications infrastructure is also important in supporting public safety, particularly in events such as floods and storms.

11. Impact on Heritage Assets

Section 66 of the Planning (Listed Building and Conservation Areas) Act 1990 stated that in considering applications which affect Listed Buildings, Local Planning Authorities must have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Policy DM20 of the Local Plan (Part 2) 2023 further outlines that proposals which would cause substantial harm to, or loss of the heritage asset will not be permitted unless it can be

demonstrated that the substantial public benefits gained would outweigh the loss of or harm to the heritage asset.

Paragraph 205 of the NPPF (2023) states 'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.'

Paragraph 206 of the NPPF (2023) states that 'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.'

Paragraph 207 of the NPPF (2023) states that 'where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- (a) the nature of the heritage asset prevents all reasonable uses of the site; and
- (b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- (c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
- (d) the harm or loss is outweighed by the benefit of bringing the site back into use.

Paragraph 208 of the NPPF (2023) states that 'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.'

In the case of this proposal, the site lies within the setting of the Grade I Listed Wyatts Almhouses, Grade II Listed boundary wall and Grade II Listed Mead Cottage.

Wyatts Almhouses is a Grade I Listed building that comprises ten almshouses, now eight flats, with chapel. The building is fronted by a Grade II Listed boundary wall. To the north-east of the Almhouses is the Grade II-Listed Mead Cottage.

The replacement monopole and lighting will be sited in the same location as the previous pole but will be taller and wider. As a result of it being set back from the road and behind

trees the previous monopole was not prominent within views of the listed buildings and due to this did not impact on their setting. Whilst floodlighting is proposed on the monopole given its distance from the Listed Buildings no harm to the heritage asset is identified.

The proposal would therefore be in accordance with Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990,

12. Design and impact on visual amenity

Policy TD1 of the Local Plan (Part 1) 2018 requires development to be of high quality design and to be well related in size, scale and character to its surroundings. The policy is attributed substantial and full weight respectively due to its level of consistency with the NPPF 2023.

Officers note a number of objections on design grounds that include the design being an incongruous feature within the tranquil landscape setting, that the height and form is unattractive and overbearing and there are many alternative locations better suited away from residential development.

Views of the proposed telecom mast and lighting will be afforded from Broadwater Park, but largely screened from Guildford Road with high trees and foliage during summer months. Furthermore, as established the monopole does not require planning permission the floodlights do and will be visible however they will be read with the wider football club which has existing floodlights and together with the monopole development, not appear unduly prominent.

Therefore, the design for these reasons would on the whole accord with Policy TD1 of the Local Plan 2018 (Part 1), Policy DM4 of the Local Plan 2023 (Part 2) and Policy GOD5 of the Godalming and Farncombe Neighbourhood Plan.

13. Impact on residential amenity

Policy TD1 of the Local Plan (Part 1) 2018 seeks to protect future and existing amenities for occupant and neighbours and ensure that new development is designed to create safe and attractive environments that meet the needs of users and incorporate the principles of sustainable development.

Given the nature as a 5G telecom application, the proposal should be supported by comment that the equipment complies with the requirements of the radio frequency public exposure guidelines for the International Commission on Non-Ionising Radiation. In line with paragraph 121 (b) of the NPPF, officers consider the provided signed statement / declaration self-certifying that the cumulative exposure, when operational, will not exceed International Commission guidelines on non-ionising radiation protection is acceptable.

The application has also been supported by a lighting assessment (Michael Butterill dated 01/05/2024). After review by Environmental Health, this is considered acceptable. Lighting level maps demonstrate light pollution would be minimal to residential properties adjacent to the football club. The lights and pitch will be visible but there should be minimal glare from direct lighting into homes and gardens. An informative has been attached.

Subject to the condition, the proposed development would not result in harm to the residential amenity of neighbouring properties in accordance with Policy TD1 of the Local

Plan (Part 1) 2018, Policy DM5 of the Waverley Local Plan (Part 2) 2023 and the Residential Extensions SPD.

14. Biodiversity and compliance with Habitat Regulations 2017

Policy NE1 of the Local Plan (Part 1) 2018 states that the Council will seek to conserve and enhance biodiversity. Development will be permitted provided it retains, protects and enhances biodiversity and ensures any negative impacts are avoided or, if unavoidable, mitigated.

Further, Circular 06/2005 states 'It is essential that the presence or otherwise of protected species and the extent that they may be affected by the proposed development, is established before planning permission is granted.'

The application site does not fall within a designated SPA, SAC, SNCI or SSSI and does not include an agricultural building or barn. Having regard to this, and the completed biodiversity checklist, it is considered that a biodiversity survey is not required in this instance.

15. Contaminated Land

The proposed development is located on the southern boundary of the former Broadwater Landfill site. Any potential for contamination will not have an impact on the proposed development. However unstable ground / unsuitable founding conditions should be anticipated if landfill materials are present. As such, a suitable informative has been attached.

16. Climate Change & Sustainability

Policy DM2 of the Local Plan (Part 2) 2023 states that all development should seek to maximise energy efficiency and reduce carbon emissions through its design, structure, orientation and positioning, landscaping and relevant technology.

The Council's Climate Change and Sustainability SPD (October 2022) is relevant.

A Climate Change and Sustainability Checklist has been submitted in support of the application. Given the nature of development and the provision of adequate telecommunications infrastructure is one strand of sustainable development and supported by Section 10 of the NPPF, no concern is therefore raised.

17. Conclusion

The planning balance assessment concludes that the proposal is in accordance with the Development Plan, as such, planning permission is recommended for approval.

Recommendation

That permission be GRANTED subject to the following conditions:

1. The plan numbers to which this permission relates are 22904_GodalmingFC_M001A (002 Site Location Plan, 100 Existing Site Plan, 200 Proposed Site Plan, 150 Existing Elevation and 250 Proposed Elevation).

The development shall be carried out in accordance with the approved plans. No material variation from these plans shall take place unless otherwise first agreed in writing with the Local Planning Authority.

Reason:

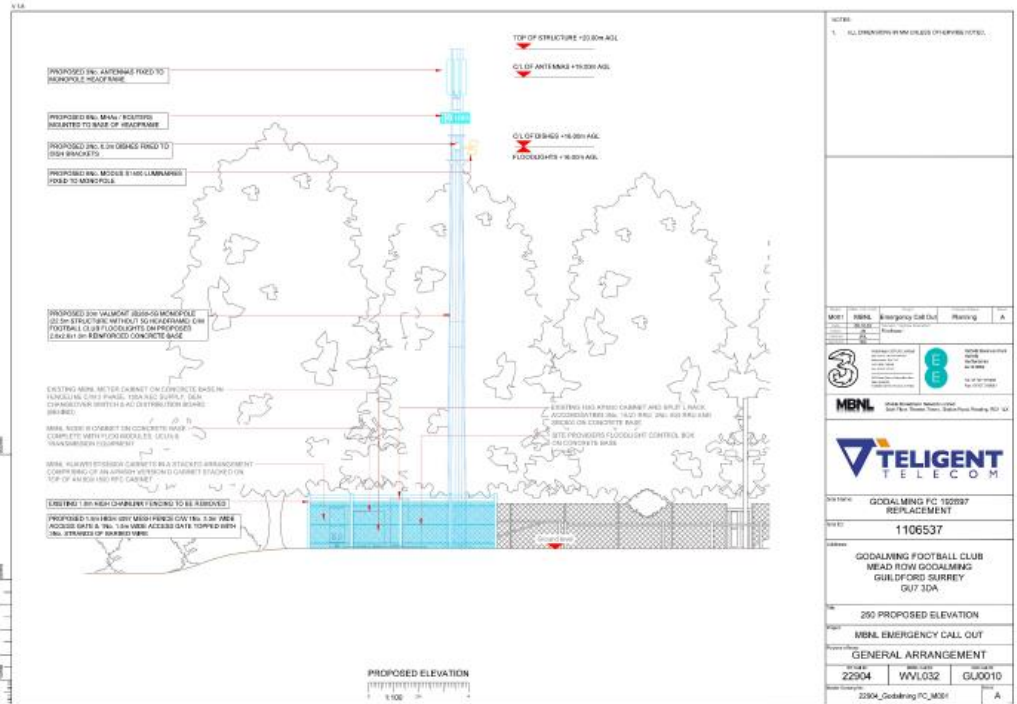
In order that the development hereby permitted shall be fully implemented in complete accordance with the approved plans and to accord with Policy TD1 of the Local Plan (Part 1) 2018 and Policies DM1 and DM4 of the Local Plan (Part 2) 2023.

Informatives

1. The granting of this planning permission does not in any way indemnify against statutory nuisance action being taken should substantiated complaints within the remit of the Environmental Protection Act 1990 be received. For further information, please contact the Environmental Health Service on 01483 523393.
2. It is recommended that the new construction should comply with all relevant building regulations. During excavations care should be taken to investigate any soils which appear by eye or odour to be contaminated. In the event that contamination, or materials suspected to be landfill waste, are found at any time when carrying out the approved works, please cease works and contact this Service immediately for advice.

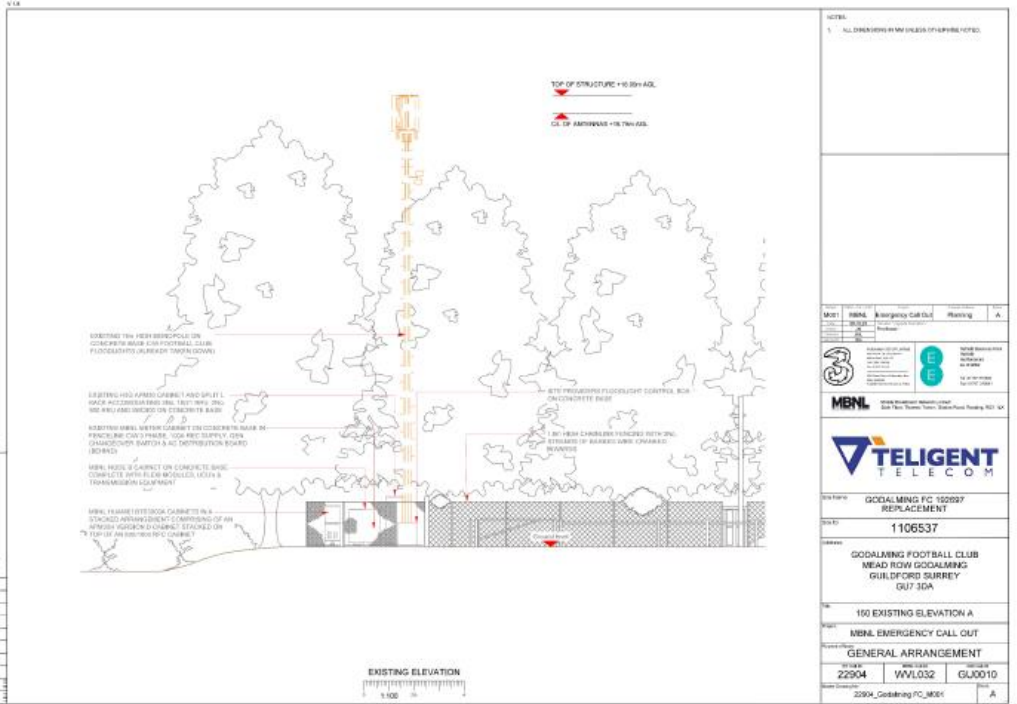
The Council confirms that in assessing this planning application it has worked with the applicant in a positive and proactive way, in line with the requirements of Paragraph 38 of the National Planning Policy Framework 2023.

Appendix



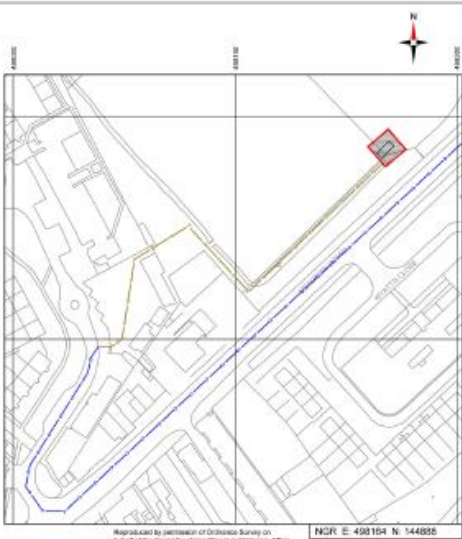
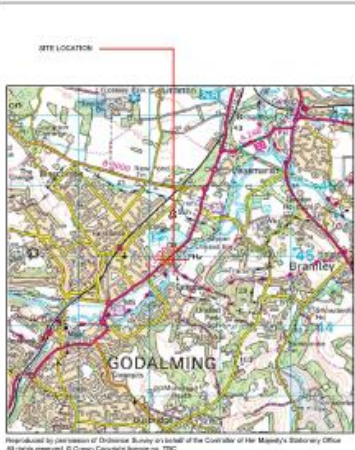
NOTES
1. ALL DIMENSIONS IN MM UNLESS OTHERWISE NOTED.

MOB	MBNL	Emergency Call Out	Rating	A
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PROJ NO	GODALMING FC 102897 REPLACEMENT			
PROJ ID	1106537			
CLIENT	GODALMING FOOTBALL CLUB MEAD ROW GODALMING GUILDFORD SURREY GU7 3DA			
NO	250 PROPOSED ELEVATION			
NO	MBNL EMERGENCY CALL OUT			
NO	GENERAL ARRANGEMENT			
NO	22904	WV1032	GL0010	
NO	22904_Godalming FC_M001			



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MOB	MBNL	Emergency Call Out	Rating	A
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PROJ NO	GODALMING FC 102897 REPLACEMENT			
PROJ ID	1106537			
CLIENT	GODALMING FOOTBALL CLUB MEAD ROW GODALMING GUILDFORD SURREY GU7 3DA			
NO	150 EXISTING ELEVATION A			
NO	MBNL EMERGENCY CALL OUT			
NO	GENERAL ARRANGEMENT			
NO	22904	WV1032	GL0010	
NO	22904_Godalming FC_M001			



GOOGLE MAPS - <https://goo.gl/maps/gxRXyJQDwf7fszG6>

GOOGLE STREETVIEW - <https://goo.gl/maps/288Nvb8PqyuKeurT9>

NOTES

1. ALL ENGAGEMENTS IN THIS PLAN SHALL BE CONSIDERED TO BE IN FULL COMPLIANCE WITH THE REQUIREMENTS OF THE LOCAL AUTHORITY.

LEGEND

Site Boundary
 Access Road To Site
 Access Road

UNIT	MBNL	Emergency Call Out	Planning	A
002	1106537			

MBNL **TELIGENT TELECOM**

GODALMING FC 150297 REPLACEMENT

1106537

GODALMING FOOTBALL CLUB
 MEAD ROAD GODALMING
 GUILDFORD SURREY
 GU7 3DA

002 SITE LOCATION PLAN

MBNL EMERGENCY CALL OUT

GENERAL ARRANGEMENT

22904	WVL032	GU0010
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22904_Godalming FC_M01 A