



SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Reading Central ATE	Site Address:	41 Minster Street
National Grid Reference:	E: 471554 N: 173311		Reading
			Berkshire
			RG1 2JB
Site Ref:	214614	Site Type: ¹	Macro

2. Pre-Application Check List - Site Selection (for New Sites only)

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	No
If no explain why:		
No suitable alternatives were identified. Re-use of an existing telecommunications site is the preferred option.		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why:		
No suitable alternatives were identified. Re-use of an existing telecommunications site is the preferred option.		

Annual Area Wide Information to local planning authority

Date of information submission to local planning authority	Information not available
Name of Contact:	
Summary of any issues raised:	

Pre-application consultation with local planning authority

Date of written offer of pre-application consultation:	07/06/2021
Was there pre-application contact:	YES
Date of pre-application contact:	09/06/2021
Name of contact:	David Brett
Summary of outcome/Main issues raised:	
Due to the location of the site (between 2 Conservation Areas and on a Grade II Listed Building) the LPA is concerned with the height and bulk of the proposed stub tower and it's impact on the amenity of these areas.	



Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Amber
The site was rated as amber due to it's proximity to areas of sensitive land usage & siting on a Grade II Listed Building, despite the reuse of an existing site. Pre-application consultation letters were sent to the following people on 7th June 2021- Councillor Karen Rowland Councillor Mohammed Ayub Councillor Tony Page No response received to date.	

School/College

Location of site in relation to school/college (<i>include name of school/college</i>): The closest schools are the Kendrick School, located approximately 490m SE of the proposed site, with Kategrove Primary School approximately 550m to the south.
Outline of consultation carried out with school/college (<i>include evidence of consultation</i>): As neither schools is in close proximity, it was considered unnecessary to consult either institution on this occasion.
Summary of outcome/Main issues raised: N/A

Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation (only required for an application for prior approval)

Will the structure be within 3km of an aerodrome or airfield?		No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		No
Details of response:		

Developer's Notice

Copy of Developer's Notice enclosed?		No
Date served:	FULL PLANNING APPLICATION- Article 13 Notice served.	

3.0 Proposed Development

The proposed site:

The site in question is located in the centre of Reading, a top of the Telephone Exchange building at 41-45 Minister Street, approx 100M North of the River Kennet. The Oracle shopping centre is located directly behind the Telephone Exchange with an array of commercial units within the vicinity which occupy huge amounts of traffic in terms of visitors to the area and residents currently living nearby the centre.

In addition the the vast array of commercial units located within 50-100M of the site, Reading train station is located approx 380M away, with the enhancement of this telecommunications cell commuters will benefit from improved 2G/3G/4G connectivity as well as benefit from 5G enhanced communications. In addition to this, the A329 and A33 will benefit from the enhancement in coverage and capacity, the proposal will provide a public benefit from all travellers in and out of the centre of Reading.

The nearest residential properties are approximately 172m to the west, along Castle Street. These properties will be unaffected by the proposal as they are fully screened from the development by intervening buildings.

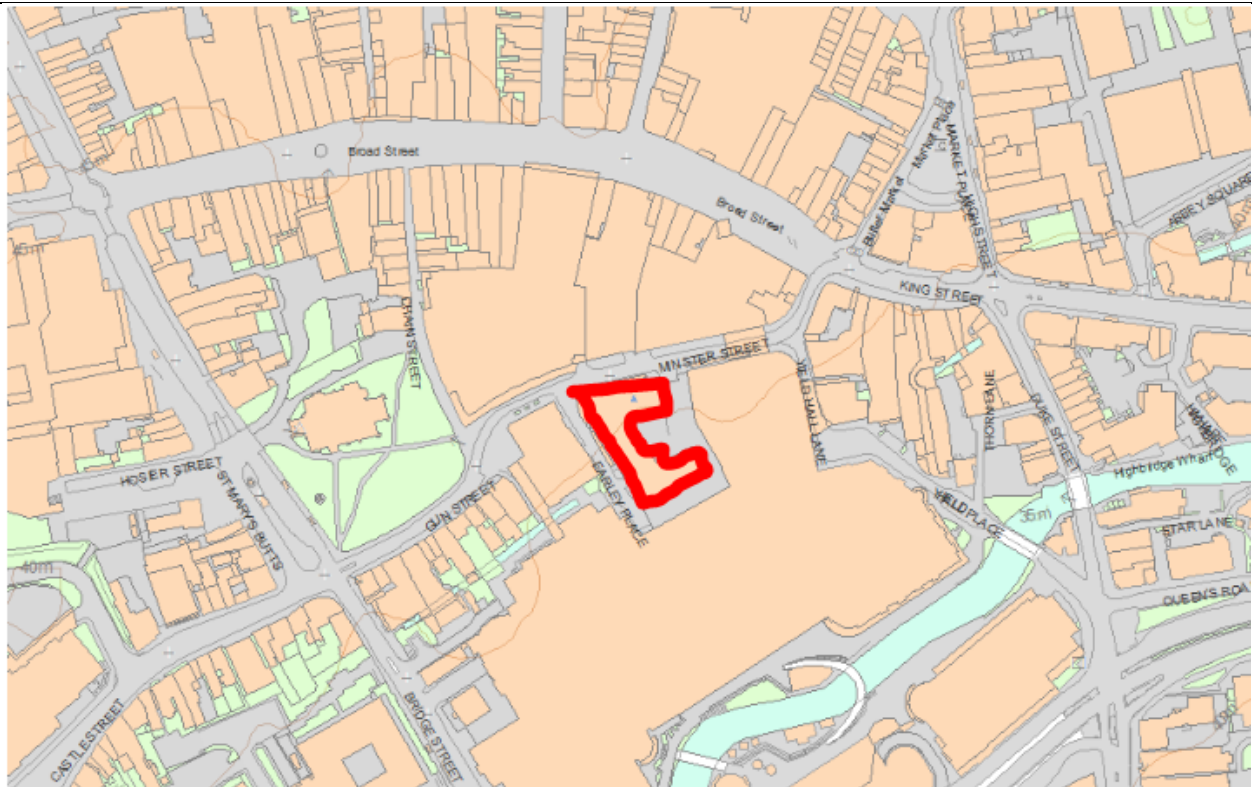
Full consideration has been given to alternative sites and other existing masts in the vicinity. However, the proposed location and design are considered to provide the optimum solution in this instance. In accordance to the NPPF sustainable approach to development the re-use of an existing telecommunications site is the preferred choice. Furthermore, another choice of location either streetworks/Greenfield or another rooftop would be considered to do more harm to the existing character and appearance of the area.

The site has to fit into an existing network, this site will allow advancements in capacity and will give the opportunity for further people to work from home and support the emergency services currently being supported by EE Limited in receiving real time data, inevitable enhancing the 2G/3G/4G communications whilst bringing 5G connectivity to the area which is imperative during the current COVID-19 pandemic.

Heritage Statement

Telephone Exchange (List Entry number: 1302939) is a grade II listed building which was first listed 26th July 1973, the statutory address is Telephone Exchange 41-45 Minister Street.

Historic England Map (Telephone Exchange edged RED)



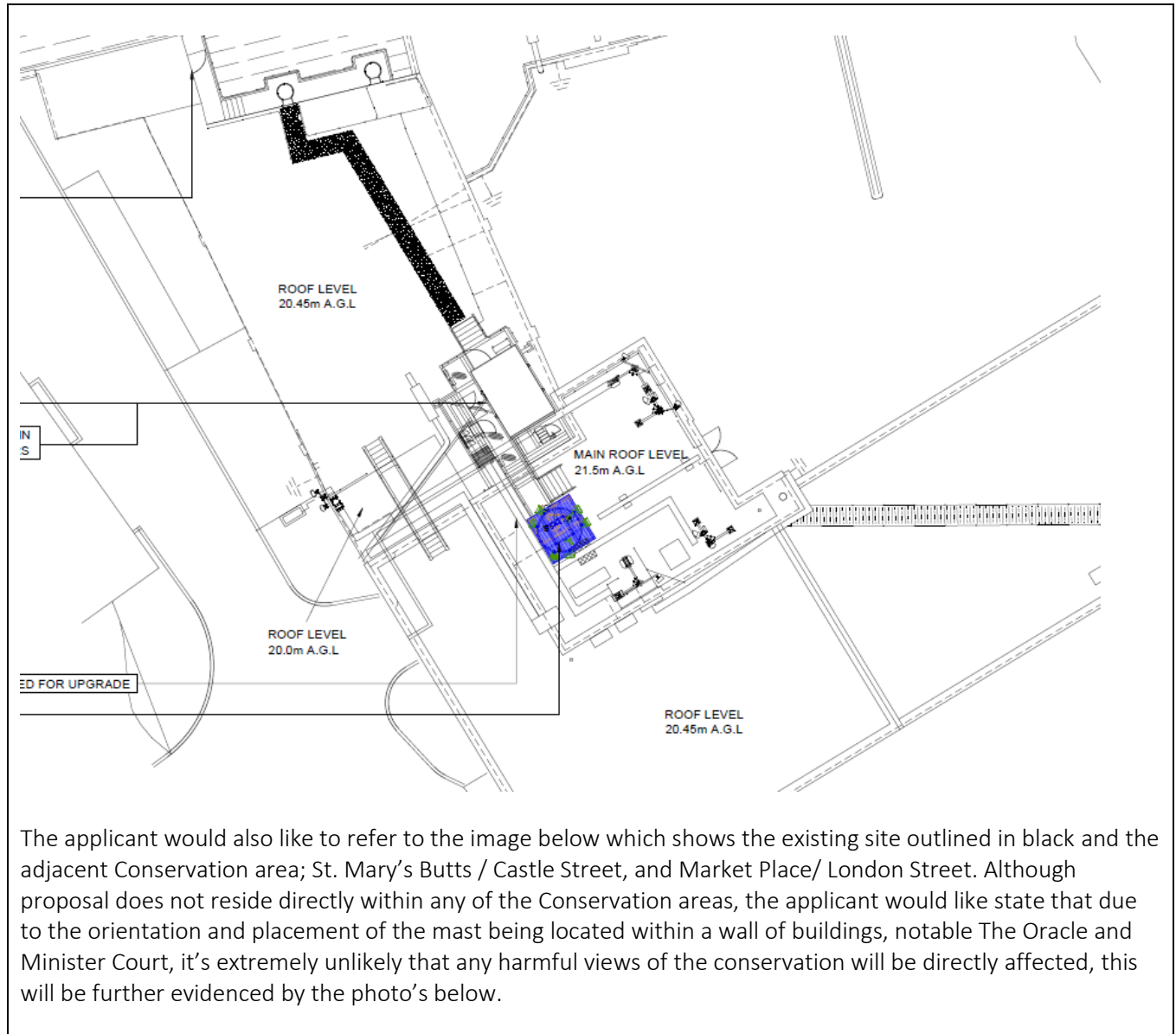
Minister Street 1.5128 (South Side) No 41 to 45 (consec) (Telephone Exchange) . Architect Leonard Aloysius Stokes, his aim was to develop British style of architecture, free from revivals of past styles. The building consequently appears somewhat plain. 3 storeys of red brick with stone dressings in an attenuated Georgian style. Conealed roof. 5 bays wide, the end bays project slightly. To right is door with cornice and lenutte window above, to the left a window treated in a similar runner, centre 3 bays divided by chamfered piers supporting cornice at 2nd floor level. Large windows between on each floor, 6 windows on 2nd floor, single sash windows in breaks.

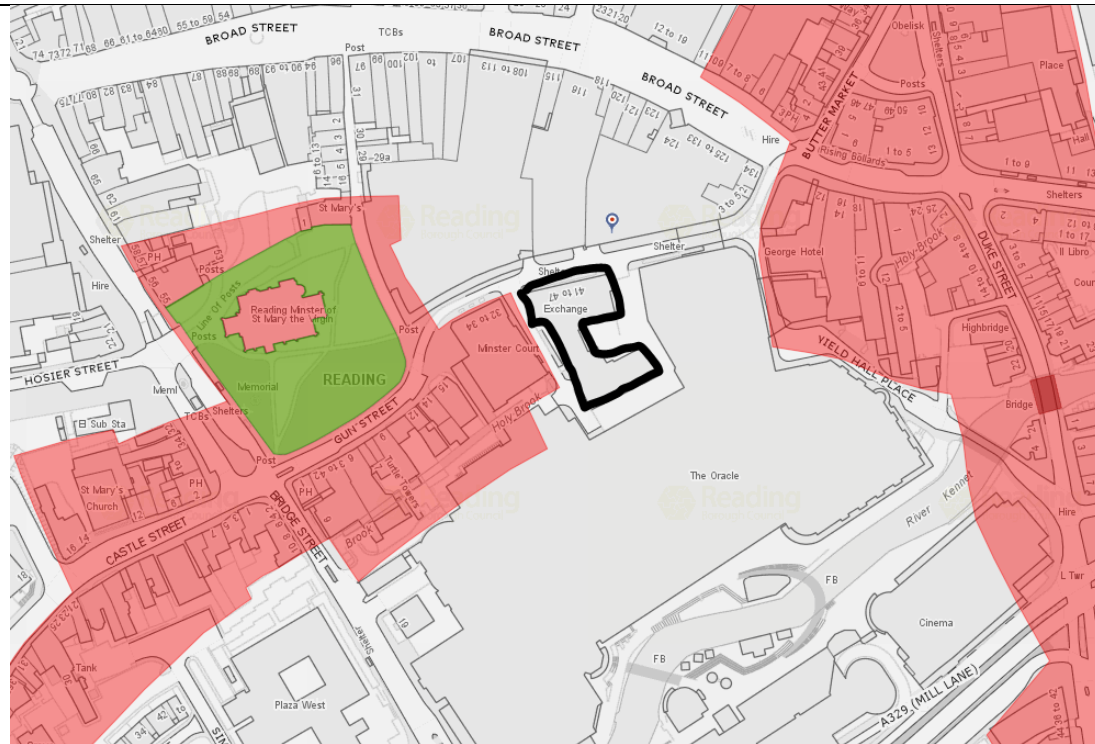
The building is therefore listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architecture or historic interest.

The applicant acknowledges the increased height and bulk of the overallstructure, however the applicant would like to highlight the orientation of the building and placement of the structure. The host building is surrounded by similar assets all of the a similar towering height, both Minister Court and the Oracle buildings provide immense screening the the host building and will diminish any harmful views of the proposed development.

Furthermore, the applicant would like to state that form ground level views form Broad Street, Gun Street, Castle Street & Kings Road will be further diminished due to the array of assets screnning the host building. The proposed development will only be seen from streetview from an obqliue angle and therefore an unnatural position, further evidencing that the proposal will have no detrimental impact to the current street scene.

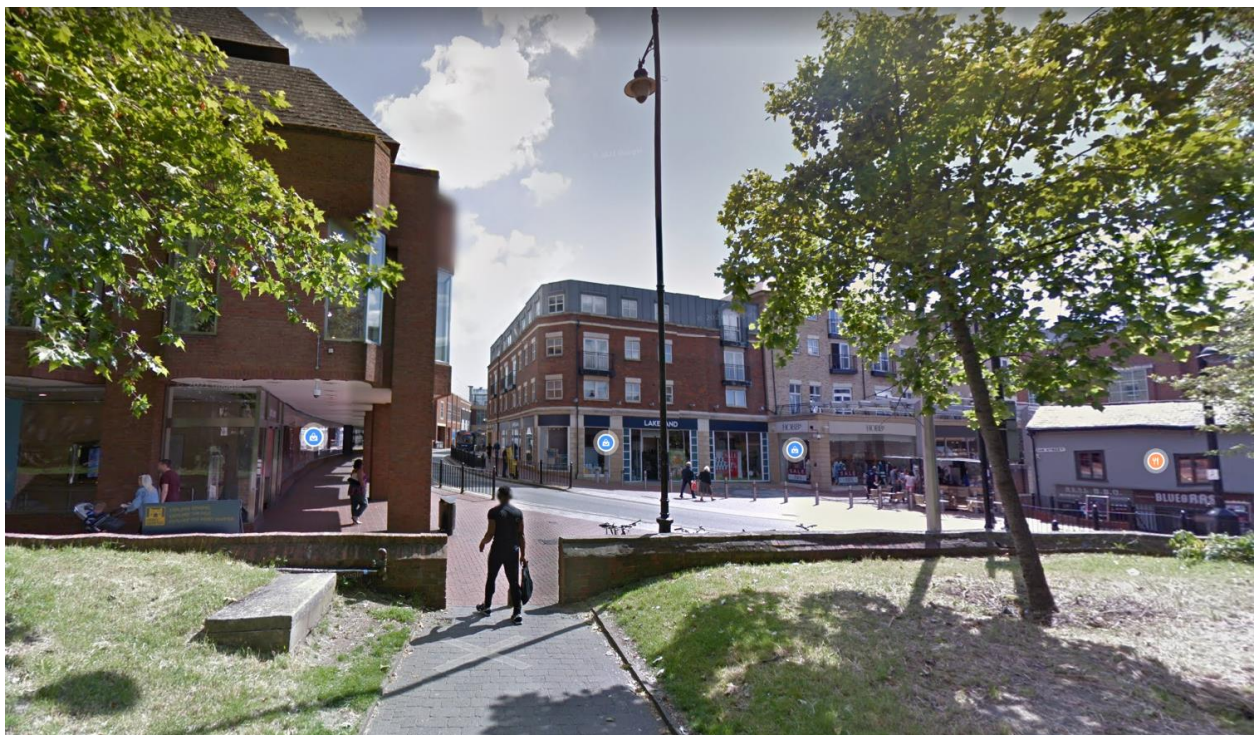
In addition to the above, if the LPA deemed necessary the antenna can be further screened by using GRP to mitigate any potential harmful views which is commonly used withint the industry. The associated kit would be affixed to the centre of the building ensuring that none of the associated equipment will be prevelant. For the avoidance of doubt if required the kit can be removed in it's entirety and the site made good if no longer required. As per the below diagram, this indicates the layout of the existing site plan and gives inidication on how the ancillary equipment will be affixed into the centre of the building rather than the outskirts to improve the screening.





Furthermore, the reasoning behind the increase in height and stature of the proposed structure is to enable dual operators (VF/O2) to enhance an existing site to incorporate new and improved 2G/3G/4G & 5G connectivity to this extremely busy area of Reading, this will allow the locality and tourists to the area benefit from high speed connectivity and enhanced capacity, which in turn boosts the local economic value. Furthermore, the utilisation of an existing telecommunications site as well as sharing a mast is the adopted approach in line with the NPPF.

View coming from Chain Street onto Minister Street.





Aerial view of the proposed site.

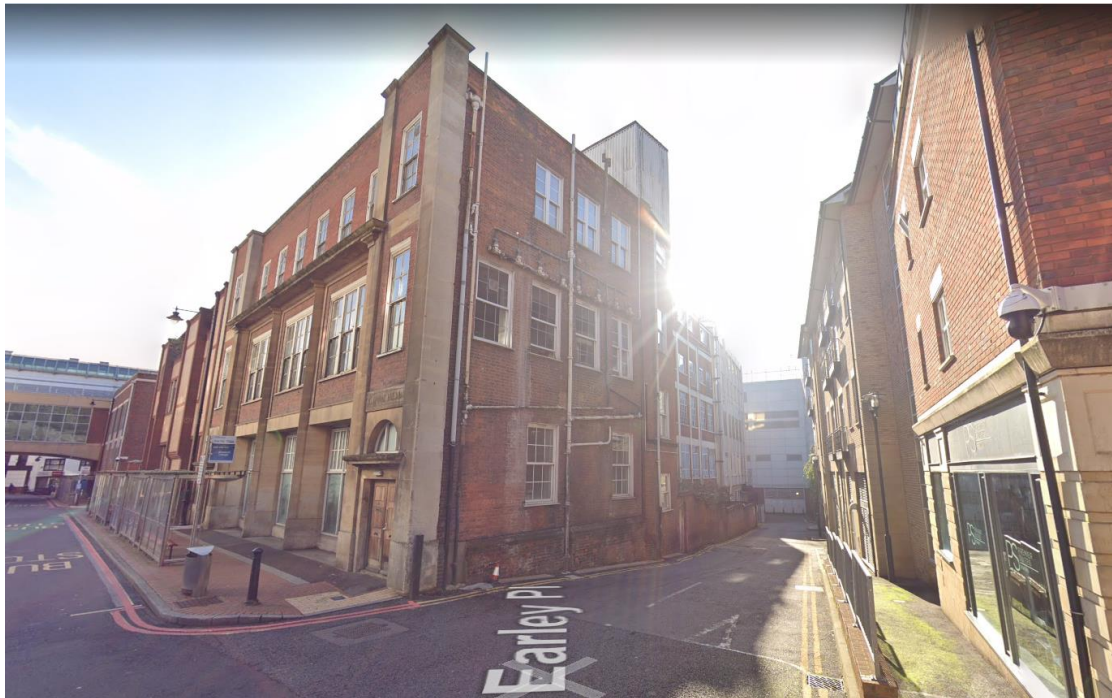


View of the proposed site from the east, looking along Minster Street.





View of the proposed site from the corner of Minster Street and Earley Place, facing the Telephone Exchange building.



Planning History

172295/FUL & 172296/LBC

Full Planning Application and Listed Building Consent for the upgrade of existing rooftop base station comprising the relocation of an existing antenna and the provision of additional 3 no. antennas together with feeder cables, steelworks and ancillary development thereto.

Granted 27-04-2018

080477

Full Planning Application for the installation of 4x panel antennas, 1x dish antenna, 4x amplifier units, a radio equipment housing and associated cabling and the relocation of two antennas associated with another service provider.

Granted 19/06/2008

080005

Listed Building Consent for the installation of roof mounted antennas and associated equipment.

Granted 29/05/2008

020012 & 021168

Full Planning Application and Listed Building Consent for the installation of 3 no. antennas, 3 no. communication dishes and 1 no. equipment cabinet on the roof.

Decided 03/04/2002

990566

Full Planning Application for the roof installation of up to six antennas together with supporting steelwork.

Decided 22-01-2001



Current Telecommunications Use/ The Future

Mobile operator networks have been under increased pressure to provide up-to-date telecommunications functionality, as mobile phones and mobile broadband use have become increasingly essential to our daily lives. 5G is the next generation of technology to enable increased connectivity with increased data speeds. The growth of digital connectivity over the last decade and the expectations of users have advanced at an unprecedented level. The NPPF recognises that “Advanced high quality and reliable telecommunications infrastructure is essential to economic growth...” , as will be considered in more detail below. The current proposal will provide positive benefits to the community which will far outweigh any perceived negative impacts.

Enclose map showing the cell centre and adjoining cells:

The proposed development provides a solution to upgrade the existing site. The existing coverage will be maintained and the technology will be upgraded to provide enhanced 2G/3G/4G coverage and as well as introducing 5G connectivity to the area. It is therefore not considered necessary to provide coverage plots in this instance.

Type of Structure (e.g. tower, mast, etc.):

Description: - The upgrading of the telecommunications base station located at Reading Central ATE, 41 Minster Street, Reading, Berkshire, RG1 2JB.

The proposed development will include installation of a 10m stub tower, 6 no. antennas, 2 no. 300mm dishes, a GPS dish and associated ancillary equipment, alongside the removal of the existing 2.5m stub tower with 6 no. antennas and associated equipment and fixings.

Overall Height: 31.5m

Height of existing building (where applicable):	21.5m
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Equipment Housing:

Length:	As per attached drawings
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Width:	
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Height:	
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Materials (as applicable):

Tower/mast etc. – type of material and external colour:	As per attached drawings Material: Steel Colour: Grey
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Equipment housing – type of material and external colour:	As per attached drawings Material: Steel Colour: Grey
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Reasons for choice of design:

Central government attaches great importance to the design of the built environment and outlines this within section 12 (Paragraph 124) National Planning Policy Framework (Revised). It states:

‘Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities’.

In keeping with the National Planning Policy Framework (NPPF) guidelines of using: “high quality communications infrastructure”, the proposed design has been selected to minimise visual impact upon the surrounding environment.



The choice of design has been heavily influenced by technical constraints as well as the existing roof-top base station's siting and appearance, the technologies it currently supports; as well as the added emphasis to cater for the future of 5G coverage and capacity requirements.

Notably, there are 3 main elements to a radio base station; the cabin or cabinets contain the equipment used to generate the radio signal(s), the supporting structure that holds the antennas in the air or fixes them to a building or structure and the antennas themselves, which emit the radio signals (along with the necessary amplifier or receiver units). Other elements necessary for the base station to function are a power source, feeder cables that link the equipment housing to the antennas and the various support structures, grillages and fixings, often referred to in general as '*development ancillary*' to the base station.

In order for the base station to effectively provide coverage to the desired areas and fit in with the established network pattern, specific antenna orientations and heights, determined by network radio planners, must be achieved. Features of the surrounding area such as existing buildings and trees referred to as 'clutter' must be cleared so the antenna can 'see over' any obstructions in order that they do not block the signals from the antennas. There are also limitations on how far from the antennas the equipment housing can be placed, as the quality of signal deteriorates as the length of feeder cables linked them increases.

In this case to achieve VF and O2's upgrade requirements, new structures are integral. The replacement antenna apertures will resemble the existing equipment subject to technical constraints. To this end, the top height of the new antenna aperture will be 32.3M (u/s) from previous 24.8M (u/s). The main roof level is 21.5M (AGL). The apertures are simply the opening in which the antennas will be installed. These will be located at the top of the slim line structure which will be affixed to the plantroom.

Minor ancillary development inclusive of BOBs/RRU's/MHA's and equipment cabinets will be located within the cabin and adjacent to the antenna apertures in a tidy architectural design. It should be recognised that seen on their own merits they do not normally require a formal determination of the Council's and would be considered permitted development. This minor ancillary equipment will be manufactured grey finish, please do note if the LPA deemed necessary GRP and other colour finished can be applied. It is considered that the design of the ancillary equipment will not have a detrimental impact upon the visual amenity of the area.

As with the existing installation, the proposed antenna apertures will be viewed within the same context of the existing equipment and associated equipment. The host building is centred between multiple large assets in an area heavily occupied by large commercial units, the proposal will be providing a public benefit in a busy area.

The technical requirements of mobile communication operators such as the applicant are acknowledged in the National Planning Policy Framework which states that local planning authorities should support the expansion of electronic communications networks which also aligns with the government's aims of the UK being a leader in Europe for 5G connectivity, this is further evidenced by the New Electronic Communications Code.

It is therefore considered that the proposal before you strikes a good balance between environmental impact and operational considerations. The proposed height and design of this replacement roof top base station represents the best compromise between the visual impact of the proposal on the surrounding area and meeting the technical requirements for the site. Taking all matters into account it is considered that this proposal to deliver the capability for a new and replacement service for two competing operators from a single network installation, would not appear out of place within the local or wider area.



4.0 Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)* International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines. When determining compliance the emissions from all mobile phone network operators on or near to the site are taken into account. In order to minimise interference within its own network and with other radio networks, Vodafone and O2's network operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision As part of Vodafone and O2's network, the radio base station that is the subject of this application will be configured to operate in this way. All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference. The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.		Yes	No
Frequency	To be provided on request		
Modulation characteristics ²	To be provided on request		

² The modulation method employed in GSM is GMSK (Gaussian Minimum Shift Keying) which is a form of Phase Modulation.
The modulation method employed in UMTS is QPSK (Quad Phase Shift Keying) which is another form of Phase Modulation.



Power output (expressed in EIRP in dBW per carrier) In order to minimise interference within its own network and with other radio networks, H3G operates its network in such a way that radio frequency power outputs are kept to the lowest levels commensurate with effective service provision. As part of VF's/O2's network, the radio base station that is the subject of this application will be configured to operate in this way.	To be provided on request
Height of antenna (m above ground level)	31.5m

5.0 Technical Justification

Enclose predictive coverage plots if appropriate, e.g. to show coverage improvement. Proposals to improve capacity will not generally require coverage plots.

Reason(s) why site required e.g. coverage, upgrade, capacity

Background:

The National Planning Policy Framework clearly states that authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.

Notwithstanding this fact, the Applicant considers it is important to explain the technical justification for this upgraded site and how this site fits into the overall network.

The NPPF states at Paragraph 112:

'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'.

An upgraded base station site is required in this location in order to maintain existing network coverage and capacity, as well as catering for added multiple technologies, most notably 5G for both VF and O2.

Mobile connectivity is becoming ubiquitous and the expectation is that it should be available throughout the country. From the first generation of analogue phones to modern 4G enabled smart phones, people have embraced the benefits provided by increased connectivity and the applications that smart phones can control. As digital systems and mobile telephony develop it has become apparent that the mere requirement to make a telephone call is secondary to the overall advantages and opportunities that modern smart phones and increased data speeds can offer.

"We will build a Britain that lives on the digital frontier, with full-fibre broadband, new 5G networks and smart technologies"



BEIS Industrial Strategy – Building a Britain fit for the Future 2017

It is anticipated that the next generation of smart phones will be only a small part of wider mobile connectivity. The first generation provided voice calls, the second generation allowed basic data such as texting and the third generation offered internet access and the development of apps. Since then the smart phone has developed further and the fourth generation has brought video and much faster data speeds allowing the integration of the smart phone into wider use.

In a letter dated 07 March 2019 'Collaborating for digital connectivity', Ministers from the DCMS and MHLG wrote to the CEOs of all Local Planning Authorities in England asking them to support the investment necessary to make the United Kingdom world leader in 5G, with the majority of the population covered by 5G signal by 2027.

The importance of mobile technology in the UK, and its contribution to social and economic development is highlighted in series of annual 'Connected Nations' reports by Ofcom.

In the Ofcom Infrastructure Report - Connected Nations 2016, the report notes that *'the United Kingdom depends on various infrastructures, and one of the most important is the nation's communications. It goes on to state that 'fast, reliable communications enable businesses to generate prosperity and employment, and our countries to compete. They empower every citizen to take a full part in society and benefit from life's opportunities. Communications also save lives, bind families and friends together, and keep us entertained'.*

The report acknowledges that 'part of Ofcom's role is to make sure that, as far as possible, we can make the calls we want to, where we need to, and that we can use the internet at acceptable speeds.

The key findings of the report are set out in the Concise Summary Connected Nations 2016. It found that people are consuming more data as fixed and mobile services become increasingly woven in to the fabric of their daily lives and work (para 2.1).

However, paragraph 2.2 of the Concise Summary report notes that for a significant number of consumers, and in many parts of the country, fixed broadband speeds are slow and mobile coverage is poor or indeed non-existent. Ofcom is therefore continuing to work with the industry, the UK Government and the devolved administrations to explore ways to improve the availability and performance of these vital communications services.

On 15 December 2017 Ofcom published Connected Nations 2017. The report acknowledges that as communications play an increasingly critical role in our lives, the supporting infrastructure must keep pace with the needs of people and businesses. Part of Ofcom's role is to help ensure that people across the UK can access a decent internet service, and make phone calls where and when they need to.

The Connected Nations Report 2017 found that since the report was first published in 2011 coverage has grown and people and businesses are better connected. However, it notes that in too many areas coverage is still poor, broadband speeds are slow and mobile services are unreliable or not available.

Connected Nations 2018, states *'people now rely on being connected through calls and online services more than ever. So, it is important they have access to reliable, good quality mobile communications, to help them keep in touch with friends and family, shop and pay bills online, or stream the latest*

must-see TV series.

In 2018, 82% of England's landmass has good 4G coverage from all four mobile operators. Voice services cover from all 4 operators cover 91% of England's landmass. Individual operator coverage for 4G is higher, at between 89% and 95% of England's landmass. 78% of homes and businesses have good indoor coverage from all 4 operators.

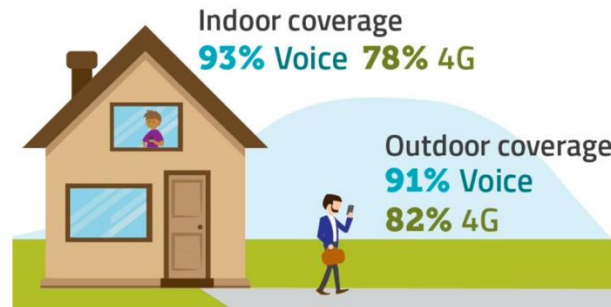


Figure 4: Extract from Connected Nations 2018

The benefits to commerce, industry and public in general are well recognised. The proposed upgraded installation will form an essential part of VF and O2's networks.

The growth of digital connectivity over the last few decades has transformed all aspects of life within the UK. It has provided the opportunity to work differently, to socialise and interact differently, to bring the world closer and to offer new commercial opportunities. The internet and mobile connectivity rely upon the deployment of new fibre networks. Utilising these fibre networks allows each mobile base station to link back into the wider core network, however, the requirements in the future are for ubiquitous coverage and this will mean the more complex, more remote locations throughout the country will need further new installations. In addition, 5G offers download speeds far in excess of what can be achieved today, even by fixed line broadband. Such increased speeds and low latency provides the potential for far greater opportunities.

Examples of this new world that will emerge from ubiquitous 5G coverage involves such things as connected and autonomous vehicles, traffic management, smart manufacturing with heterogeneous autonomous machines, direct machine to machine communication, advanced medical devices, automated agriculture, far greater security provision, more stable and reliable connectivity and advances in further application development with uses not yet identified. All of the above provides an insight into the future development of connectivity in our modern world and also provides a further insight into the expected minimum eight-fold increase in data usage by each mobile operator over the next 5-6 years.

Site ³	Site Name and address	National Grid Reference	Reason for not choosing ⁴
GF	N/A	N/A	No alternative GF locations within this heavily occupied commercial area, Greenfield are optimal in rural areas rather than urban areas such as this. If a greenfield site was proposed it would look out of context with the nature of the area and therefore greenfields have been discounted entirely.
RT	Davidson House, King's Road, Reading Town Centre, Coley, Reading, RG1 3EU	E: 471811 N: 173483	This option was considered, however was further discounted due to space on the rooftop, the roof already consists of plant and solar panels and therefore was discounted. The site is also located further into the Conservaiton area and therefore utilising an existing site outside of the Conservation area was found favourable.
SW	Inner Distribution Road, Spring Gardens, Coley, Reading, RG1 2NJ	E: 471441 N: 172977	This option was considered but found unsatisfactory due to being a flood risk, also the site would not serve as much of an area as the host site application and therefore has been discounted on this merit.

³ ETS - Existing Telecomm site, ES - Existing Structure, RT - Roof Top, GF - Greenfield

⁴ SP - Site Provider, RD - Redevelopment Not Possible, T - Technical Difficulties, P – Planning
O – Other



Additional relevant information

Planning Policy Assessment

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with policies of the adopted Statutory Development Plan, unless material considerations indicate otherwise.

National Planning Policy Framework (2019)

The NPPF 2019 places a high importance on the need to upgrade England's digital communication network and the promotion of economic growth. Key policy references are identified in the planning application Supplementary Information:

- *Para 112 emphasises that "high quality and reliable communications infrastructure is essential for economic growth and social well-being" and that "planning policies and decisions should support the expansion of electronic communications networks".*
- *Para 113 advises that the re-use of existing masts and buildings should be encouraged and equipment should be well designed/camouflaged where possible.*

The proposal has been designed with the aim of achieving a balance between minimising visual impact and achieving the technical requirements for VF and O2 to enhance telecommunications services in the area to the benefit of the local community and visitors to the area. It will make effective use of the land as set out under Section 11 of the NPPF.

The current proposal is for an important investment in upgrading the communications infrastructure in this area of Reading. Full consideration has been given to alternatives, including existing masts and the proposal is considered to provide the best option in terms of meeting the technical requirements in a location with limited local impacts.

Improving the communications infrastructure is critical to supporting sustainable economic growth. Para 80 of the NPPF notes that significant weight should be placed on the need to support economic growth and productivity. Para 82 states that planning decisions "*should address and recognise the locational requirements of different sectors*" which will include the needs of the locational requirements of digital communications infrastructure.

The proposal supports better communication services for local residents and visitors to and through the area, it supports economic growth, choice and is part of the new technology the Government wishes to encourage and support. Importantly, it also reduces the need to travel, particularly at peak-periods, and allows working from home to take place. It therefore constitutes sustainable development.

Furthermore, with the new government guidance during COVID-19 pandemic in supporting telecommunications as critical service.



National Planning Policy Framework (2021)

The National Planning Policy Framework (NPPF) was published in July 2021 and supersedes previous versions of the document and national planning guidance contained in the various Planning Policy Guidance notes and planning Policy Statements. The NPPF sets out the Government's economic, environmental and social planning policies and how these are to be applied in relation to all planning applications.

Under Section 6 paragraph 81 the NPPF advises....*"Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development."* In terms of supporting a prosperous rural economy paragraph 85...*"The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist."* The proposal seeks the upgrade of an existing telecommunications site, rather than utilising land which has not previously been developed. This approach provides a sustainable solution to the need to upgrade telecommunications services in the area which will benefit not only the local community, but also visitors to the area and potentially reducing the need to travel.

In section 10 of the new NPPF, the document seeks to support *"Advanced, high quality and reliable communications infrastructure"* ensuring that it is *"essential to economic growth and social wellbeing"*. It advises that *"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 115 states *"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. 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."* The proposal allows for the re-use of an existing telecommunications site which will be upgraded to allow for the introduction of 5G technologies.

Paragraph 116 continues *"Local planning authorities should not impose a ban on new electronic communications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of electronic communications development, or insist on minimum distances between new electronic communications development and existing development. They should ensure that:*

- a) they have evidence to demonstrate that electronic communications infrastructure is not expected to cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and*

- b) They have considered the possibility of the construction of new buildings or other structures interfering with broadcast and electronic communications services.*

The scheme will not cause any undue impact on the services outlined above and fully complies with ICNIRP standards. An ICNIRP certificate is enclosed with the application. The proposal has been designed with the aim of achieving a balance between minimising visual impact and achieving the technical requirements for CTIL to enhance telecommunications services in the area to the benefit of the local community and visitors to the area. It will make effective use of the land as set out under Section 11 of the NPPF. It is considered the proposed development complies with the broad aims of the NPPF. It assists in the aim to keep the number of installations to a minimum, by utilising an



existing site. The equipment has been sympathetically designed, with the stub tower being kept to the minimum practicable height for the required to accommodate 4G and 5G network coverage, thus enhancing the provision of local community facilities and services without detracting from local amenity. More sensitive sites were specifically avoided and re-use of an existing telecommunications site provides the optimum solution in this instance.

Local Plan Policy

The statutory development plan for the area is comprised of Reading Borough Local Plan (Adopted November 2019), in addition to the St Mary's Butts / Castle Street Conservation Area Appraisal document and the Market Place / London St Conservation Area Appraisal document in this instance.

Reading Borough Local Plan (Adopted November 2019).

CC2: PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

A positive approach to considering development proposals will be taken that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF). Where appropriate, the Council will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible. Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. Planning applications that accord with the policies in the development plan (including, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. Proposed development that conflicts with the development plan will be refused, unless other material considerations indicate otherwise.

Where there are no policies relevant to the application or the policies which are most important to determining the application are out of date at the time of making the decision then permission will be granted unless material considerations indicate otherwise – taking into account whether:

- *The application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.*

The development has been erected for a number of years, the proposed development not only improves the existing 2G/3G/4G coverage whilst bringing 5G connectivity to the area, it also allows the applicant to upgrade the equipment to the most up to date equipment currently available. This aligns with policy CC2 in ensuring sustainable development by bringing a futuristic design which is fit for purpose.

CC7: DESIGN AND THE PUBLIC REALM

All development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located. The various components of development form, including: -

- *Layout: urban structure and urban grain;*
- *Landscape;*
- *Density and mix;*
- *Scale: height and massing; and*
- *Architectural detail and materials will be assessed to ensure that the development proposed makes a*



positive contribution to the following urban design objectives: -

- *Character - a place with its own identity and sense of place*
- *Continuity and enclosure*
- *Quality of the public realm and provision of green infrastructure and landscaping*
- *Ease of movement and permeability*
- *Legibility - clear image and easy to understand*
- *Adaptability – capable of adaptation over time*
- *Diversity – meets a wide range of needs.*

Developments will also be assessed to ensure that they: -

- *Respond positively to their local context and create or reinforce local character and distinctiveness, including protecting and enhancing the historic environment of the Borough and providing value to the public realm;*
- *Create safe and accessible environments where crime and disorder or fear of crime does not undermine quality of life or community cohesion;*
- *Address the needs of all in society and are accessible, usable and easy to understand by them, including providing suitable access to, into and within, its facilities, for all potential users, including disabled people, so that they can use them safely and easily;*
- *Are visually attractive as a result of good high quality built forms and spaces, the inclusion of public art and appropriate materials and landscaping.*

Applications for major developments, or other relevant developments, should be accompanied by a design and access statement that deals with all the above matters.

In devising the scheme, consideration has been given to the character and appearance of the existing area, as well as the required technical improvements sought. Whilst the replacement stub tower is larger than that which already exists, it needs to be in order to provide the required advancements in 2G/3G/4G and 5G connectivity. Furthermore, the design accommodates two operators (VF/O2) and negates the proliferation of masts in any one area.

The site is an existing telecommunications site that has been in use for several years, without causing undue visual harm. While the building is Grade II listed, it is located in a predominantly commercial area, with shops to the north and a purpose-built shopping centre to the south. There is a need for up-to-date technologies to safeguard the future prosperity of the area and will be of great benefit to local businesses and the community more generally.

Notwithstanding the increase in height proposed, it is considered that the stub tower will be assimilated into the existing environment without causing significant harm to the overall character and appearance of the area. Views of the development will only be afforded from the east side of the building and it is contended that any such views will be mitigated due to the more utilitarian nature of the particular area of the building the proposal will be located on. Furthermore, the applicant would like to state the equipment will be affixed to the roof and GRP can be used to further screen the antenna's. For the avoidance of doubt the site will be made good and return to how it was previously if the site was ever not required.

Any perceived negative impacts in visual terms will be outweighed by the overall benefits of the proposal in bringing up-to-date technologies to the area.

CC8: SAFEGUARDING AMENITY

Development will not cause a detrimental impact on the living environment of existing residential



properties or unacceptable living conditions for new residential properties, in terms of:

- *Privacy and overlooking;*
- *Access to sunlight and daylight;*
- *Visual dominance and overbearing effects of a development;*
- *Harm to outlook;*
- *Noise and disturbance;*
- *Artificial lighting;*
- *Vibration;*
- *Dust and fumes;*
- *Smell;*
- *Crime and safety; or*
- *Wind, where the proposals involve new development of more than 8 storeys.*

The nearest residential properties are some 172m away to the west. It is considered that they will not be afforded views of the development due to the built-up nature of the area in between, in particular, the height of the buildings.

EN1: PROTECTION AND ENHANCEMENT OF THE HISTORIC ENVIRONMENT

Historic features, areas of historic importance and other elements of the historic environment, including their settings will be protected and where possible enhanced. This will include:

- *Listed Buildings;*
- *Conservation Areas;*
- *Scheduled Monuments;*
- *Historic parks and gardens; and*
- *Other features with local or national significance, such as sites and features of archaeological importance, and assets on the Local List.*

All proposals will be expected to protect and where possible enhance the significance of heritage assets and their settings, the historic character and local distinctiveness of the area in which they are located. Proposals should seek to avoid harm in the first instance. Any harm to or loss of a heritage asset should require clear and convincing justification, usually in the form of public benefits.

Applications which affect Listed Buildings will not have an adverse impact on those elements which contribute to their special architectural or historic interest including, where appropriate, their settings. Applications which affect Historic Parks and Gardens will safeguard features which form an integral part of the special character or appearance of the park or garden. Development will not detract from the enjoyment, layout, design, character, appearance, features or setting of the park or garden, key views out from the park, or prejudice its future restoration.

Applications which affect, or have the potential to affect, the significant features of heritage assets should be justified by a Heritage Statement.

The Council will monitor buildings and other heritage assets at risk through neglect, decay or other threats, proactively seeking solutions for assets at risk including consideration of appropriate development schemes that will ensure the repair and maintenance of the asset, and, as a last resort, using its statutory powers.

Where there is evidence of deliberate neglect or of damage to a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.



The applicant acknowledges the increased height and bulk of the overall structure, however the applicant would like to emphasise the orientation of the building and placement of the structure has been strategically done to ensure sufficient screening from the existing high level built up units that surround the existing asset such as Minister Court and The Oracle shopping centre which both help diminish any potentially harmful views.

In addition, the applicant would like to point out views from ground level, namely Broad Street, Gun Street, Castle Street & Kings Road will be further diminished due to the array of built up assets in this heavily occupied commercial urban area. The applicant would like to highlight that GRP antenna's can be used to further mitigate views and all of the kit will be placed in the centre of the building meaning the edges will remain protected and intact to keep the historical element of the building.

The applicant would also like to further illustrate that there has been an existing telecommunications site located at the host building for a number of years with evidence of previous planning approvals, the re-use of an existing asset specifically within this challenging area is the adopted approach by the NPPF. The public benefit of the scheme far outweighs any perceived negative impacts and would like to reference the historic statement labelled above.

EN3: ENHANCEMENT OF CONSERVATION AREAS

The special interest, character and architecture of Conservation Areas will be conserved and enhanced. Development proposals within Conservation Areas must make a positive contribution to local character and distinctiveness. Positive consideration will be given to proposals which take opportunities to enhance the character of conservation areas. These may include:

- *Reducing visual clutter caused by negative factors, such as poles and overhead wires, satellite dishes or unnecessary street furniture;*
- *Restoring original building features;*
- *Removing inappropriate additions or alterations to buildings;*
- *Protecting and encouraging the maintenance of green spaces and important trees, particularly where they are intrinsic to the history and character of the area;*
- *Improving signage and street furniture;*
- *Restoring or re-establishing appropriate paving, railings or walls;*
- *Sympathetic landscaping and planting;*
- *Improving or restoring green spaces, including front gardens, that are appropriate to the historic interest of a Conservation Area;*
- *Signage that reveals and promotes the Conservation Area and its boundaries;*
- *Interpretation panels to inform the public of the area's historical significance.*

Where a Conservation Area Appraisal and Management Plan has been adopted for a particular Conservation Area, this will be a material consideration in determining applications for development.

The proposed development is not located within a conservation area, however, it is located adjacent to St Mary's Butts / Castle Street Conservation Area and approximately 102m west of Market Place / London St Conservation Area.

Despite the building's proximity to these conservation areas, it is contended that neither will be detrimentally impacted by the proposal. Views of the installation from the Market Place / London St Conservation Area will be mitigated by the built-up nature of the intervening area. Similarly, while the upper floors of the adjacent building within the St Mary's Butts / Castle Street Conservation Area may be afforded views of the development, it is considered that there will not be any negative impact on the wider conservation area.



Due to the orientation of the building and placement of the mast, it's unlikely that any views from the adjacent Conservation area will be affected. The urban area is heavily dominated by commercial assets and views of the mast from ground level will only be seen at certain angles or oblique views, even if views upon the majority of the mast will be screened with the associated equipment completely screened.

Furthermore, the applicant would like to stress that if another site is sort this would likely be located directly within the Conservation areas labelled above and therefore believe that upgrading this existing site will lesson the overall impact within the area and negate the need for multiple masts in any one area. Due to the points made above and made within the historic statement, the applicant believes the proposal aligns with policies EN1 and EN3.

EN15: AIR QUALITY

Development should have regard to the need to improve air quality and reduce the effects of poor air quality.

i. Development that would detrimentally affect air quality will not be permitted unless the effect is to be mitigated. The following criteria should be taken into account:

- *Whether the proposal, including when combined with the cumulative effect of other developments already permitted, would worsen air quality;*
- *Whether the development is within, or accessed via, an Air Quality Management Area; and*
- *Whether it can be demonstrated that a local worsening in air quality that would not detrimentally affect human health or the environment would be offset by an overall improvement in air quality, for instance through reduction in the need to travel.*

ii. Where a development would introduce sensitive uses (such as residential, schools and nurseries, hospitals, care facilities) into, or intensify such uses within, an Air Quality Management Area, detrimental effects on that use will be mitigated. Mitigation measures should be detailed in any planning application. If there are significant detrimental effects that cannot be mitigated, the application should be refused.

iii. Where required, planning obligations will be used to secure contributions to measures to tackle poor air quality or for air quality monitoring.

While the proposed site lies within an Air Quality Mangement Area (AQMA), a telecommunications development will not have any adverse impact on the air quality. Neither the installation nor the maintenance of the installation will necessitate an increase in road traffic to the area.

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.*



The proposed site has been chosen for upgrade as it complies with the NPPF's preference for the reuse of existing telecommunications sites, in order to avoid unnecessary clutter and proliferation of telecommunications base stations and equipment.

As the development is sited to the rear of the building, on the more modern extension, it is contended that it does not impact on the significance of the heritage asset nor the visual amenity of the surrounding area. Views of the site from the surrounding area will be limited, impacting mostly the upper floors of the adjacent building to the west and a small section of Minster Street to the east. Despite the increase in height, it is considered that the height of the building in question and the surrounding buildings will mitigate any detriment to visual amenity.

The stub tower will be coloured appropriately so that it will blend into the skyline as much as possible.

The proposal has been specifically designed to provide the required level of coverage with minimal visual impact. Every effort has been made to design and locate the proposed development to be as unobtrusive as possible.

The technical advancements the proposal will offer will enhance the overall coverage of the area by giving bigger bandwidth and faster connectivity in highly populated areas. The advancements will effect existing 2G/3G/4G networks, whilst bringing 5G connectivity to the area. The proposal will support dual operators (VF/O2) and provide an immense public benefit to both residents of the area and tourists to the area.

CR2: DESIGN IN CENTRAL READING

Applications for development within Central Reading should demonstrate the following attributes:

- a. Development will build on and respect the existing grid layout structure of the central area, providing continuity and enclosure through appropriate relationships between buildings and spaces, and frontages that engage with the street at lower levels, and contributing towards enhanced ease of movement through and around the central area;*
- b. Development will provide appropriate, well designed public spaces and other public realm, including squares, open spaces, streetscape, utilising high quality and wellmaintained hard and soft landscaped areas, and public art, that provide suitable functions and interest, sense of place and safe and convenient linkages to adjoining areas;*
- c. Development should consider and, where possible, include ways of providing green infrastructure designed into the development, for instance through roof gardens, green walls and green roofs, to enhance the otherwise very urban environment;*
- d. The architectural details and materials used in the central area should be high quality and respect the form and quality of the detailing and materials in areas local to the development site;*
- e. Development and any associated public realm should contribute to the diversity of the central area, be capable of easy adaptation over time to meet changing circumstances, and be designed to enhance community safety; and*
- f. Development should be designed with consideration of adjacent development sites, and should not prevent or cause unreasonable burdens on the future development of those sites.*

It is considered that the proposed development seeks to positively contribute to the surrounding area of Central Reading, by bringing enhanced coverage and capacity in the form of 2G/3G/4G and 5G technologies, which will provide new opportunities to the area on a personal and professional level, as well as encourage future investment and safeguard the future of the area's local assets.

The advancement of technology will bring a social-econimcal benefits to this area of Reading by



enhancing connectivity to the locality and tourists alike. The advancements of coverage will cover entirety of the centre of Reading and also Reading train station which are both heavily occupied areas with a large demand of traffic.

CONCLUSION

There is a requirement for CTIL to provide advanced telecommunications technologies to this commercial area in Reading. Network planners have identified a need for an upgraded installation and the proposed development will address this identified need and continued customer demands.

National planning policy is to facilitate the growth of new and existing telecommunications systems, and operators have obligations to meet customer demands for improved quality of service. This application explains the technical need for the installation to provide improved customer service.

In terms of siting and design, it is considered that the proposal responds well to the character and appearance of the local environment and will not have an unacceptable adverse impact on the application site or the surrounding area. The design is of a high standard, and will not detract significantly from the existing visual and environmental character of the area. The benefits to residents and visitors to the area, by the introduction of 5G technologies to the area far outweigh any potential perceived negative impacts. In all these circumstances it is concluded that there no policy or other objections that would warrant the refusal of planning permission and accordingly permission should be granted for the proposed development.

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