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1.0 Introduction

This Planning Supporting Statement has been prepared by Harlequin Group on behalf of the Wireless Infrastructure Group (WIG). The statement has been prepared in support of the application to remove the existing 15m monopole and replace it with a new 25m lattice mast and ancillary equipment at Southcote RS, Burghfield Road, Southcote, RG30 3NB. This application is made under the Development Management Procedure Order (2015). The statement sets out the most relevant considerations in respect of the proposed development.

1.1 About Wireless Infrastructure Group

WIG is an independent provider of wireless infrastructure and an Electronic Communications Code ('Code') Operator. The company was launched in 2006 and is head-quartered in Bellshill, Lanarkshire. WIG is backed by infrastructure investors and has major plans to invest in digital infrastructure to improve mobile and wireless connectivity in rural areas.

WIG does not operate a retail network of its own and instead builds and operates wholesale infrastructure for the sole purpose of providing access to all wireless network operators on a shared basis. The four MNOs, together with over 100 other smaller networks, use our infrastructure to deliver a wide variety of services ranging 2G, 3G, 4G mobile through to fixed wireless broadband, emergency radio services, broadcast and local wireless services.

WIG operates over 2,000 communications towers across the UK with over 50% located in rural areas. In Scotland, WIG's rural communication towers support an average of over four networks each, enabling transformational levels of connectivity for the communities they serve. International consultancy Ernst & Young highlighted in a recent report¹ that the independent sector "can play a valuable role in promoting effective infrastructure use – enabling lower costs, increased coverage for remote areas, and increased retail competition for mobile services". Ernst & Young further noted that the sector has "a proven track-record in sharing towers with multiple network operators" and referenced evidence that independent towers enable 2-3x more connectivity than towers deployed by traditional network operators.

Supporting this application will therefore not only secure investment in a high-quality infrastructure asset for the community but also ensure that the tower is deployed by a Code Operator focussed on maximising the use of that infrastructure to enable ongoing improvements to connectivity over the long term.

1.2 The importance of mobile connectivity

The ability to access mobile data and voice services is an integral part of modern life. Mobile devices are relied upon by consumers and businesses. Mobile connectivity is no longer seen as a luxury: the ability to make calls, access the internet and receive e-mail and text is seen as a necessity. Businesses, large and small, need mobile connectivity to operate effectively and to compete in an increasingly global market. In an emergency, the public rely upon mobile devices to call for help and the emergency services rely upon mobile services to respond.

1.3 UK government policy on mobile infrastructure deployment

The UK government has identified the need for greater investment in mobile infrastructure to increase the widespread availability and capacity of mobile voice and data networks.

“The Government acknowledges that there has been a profound shift over the last decade in the way citizens approach and access digital communications. What was once seen as a luxury is now a basic need, and people expect to have access to fast broadband at home, irrespective of where they live, and use their mobile devices anywhere they go”. DCMS, May 2016.

The last few years have seen a number of UK-wide initiatives to improve coverage including:

- Coverage commitments in the 4G LTE spectrum awarded to Telefonica O₂ (February 2013) to deliver mobile broadband with 98% indoor premises coverage by the end of 2017
- National commitment by all four MNOs (December 2014) to deliver 90% geographic coverage by 2017
- Mobile Infrastructure Project (MIP) – investment by DCMS of up to £150m (to March 2016) in towers to deliver connectivity in complete mobile notspots.
- Changes to the Permitted Development rights afforded to communications code operators (such as WIG) to allow new networks to be rolled-out more efficiently.
- Changes to the Electronic Communications to Code (December 2017) to allow mobile operators to more easily roll-out new communications infrastructure.

1.4 WIG commitment to the responsible development of wireless infrastructure

WIG is committed to the responsible development of wireless infrastructure. We explore all of the alternative locations in a given region and rank the options based on strict Town Planning criteria (visual amenity, impact on the local community), balanced against the physical requirements of the tower (radio plan coverage, backhaul line of sight, power and road access). We operate in accordance with the Code of Best Practice on Mobile Network Development (November 2016)² including the commitments to maintain clear standards and procedures and continue to deliver, with other interested parties, high quality consultation with local communities; and to participate in appropriate pre-application consultation with planning authorities. In the case of this site, WIG is upgrading and deploying within land which is already in use for utility infrastructure.

²<http://www.mobileuk.org/codes-of-practice.html>

2.0 Proposed Development

2.1 Site and Proposed Development

The application site is located towards the south of the existing SSE Sub-Station, adjacent to the main access for the site off the Burghfield Road and the location of the existing mast granted permission after an appeal under application reference 05/00326/TELE (see planning history below). Beyond the road to the east of the site is an open field with a Palisade fence running along its boundary with the road and a field access gate immediately to the south of the fence ending. Immediately to the north of the SSE site is the railway line, with mature trees to the north of the railway line and area of vacant land beyond providing a buffer between the railway and the development limits for the town. The distance between the proposed site and the nearest residential property is approximately 150m. Approximately 200m to the south of the site is Holybrook Farm, with the River Kennet a similar distance further to the south and the industrial estate with is located immediately adjacent to the south bank of the river. The site location and existing mast can be seen in the image below, heading north along Burghfield Road.



Image 1: Site Location

The proposal is for the erection of a new 25m lattice tower with a total of 12No. antenna (6No. EE and 6No. Huawei) installed on face alignment frames at a mean height of between 22.8m and 24.2m AGL, along with ancillary equipment (24No. RRU's and 9No. BOB's and 6No. MHA's) and 4No. EE 600mm diameter dishes. The proposed lattice tower would be 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. Furthermore, while the existing monopole would be removed the existing concrete base would be retained to house the new EE/H3G equipment cabinets (total of 6No. new cabinets).

The drawings submitted with this planning application provide further details regarding the specific location, design and material specifications of the equipment

The proposed 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. It would also provide opportunity for additional operators to site share in the future, reducing the number of masts within the locale.

2.2 Application History

This application is being submitted in an effort to provide the necessary upgrade in the mobile phone network coverage to the west part of Southcote. Our client, WIG, operates the rights to accommodate telecommunications equipment on behalf of EE, and this proposal forms part of the wider mobile network providing a necessary improvement in connectivity.

As highlighted above, there is an existing 15m high monopole at the site for which permission was originally refused on 17 May 2005 (application reference 05/00326/TELE). The reasons given by the Council in refusing the application relates to; it being a dominant structure when viewed from Southcote Linear Park and Lea Close; and it was not accepted that it was demonstrated to the Council's satisfaction that there further more suitable alternative sites which may have a lesser visual impact, both considered contrary to Policy CUD17 of the Reading Borough Local Plan 1998.

This decision was appealed with the appeal subsequently allowed and approval granted subject to a condition requiring the submission of a programme of archaeological works. In the appeal decision, the Inspector concluded that the proposed development would cause only limited harm to the character and appearance of the surrounding area, and this limited harm would be outweighed by the need for the proposed development in this location.

2.3 Alternative Site Assessment

As the proposal would see the removal of the existing tower and replacement with a new tower, albeit increased in height from 15m to 25m, it is considered that the proposal is for works at an established telecommunications site and not for the development of a new site, thus the consideration of alternative sites is not appropriate in this instance. As a result, it is therefore considered that the principle of telecommunications development at this location is acceptable.

2.4 Local Engagement

The site has been rated as green on the mobile operators' consultation traffic light rating system. The reason for this is that the principle of the site hosting telecommunications infrastructure is considered as acceptable, given the existing infrastructure has been in-situ for circa 15 years. It is not therefore considered necessary to undertake any pre-application engagement with the planning authority, ward Councillors or the Parish Council. Furthermore, the site is not within close proximity to any residential properties (nearest in excess of 150m to the north) or schools/collages and is not within any designated protected land or nearby heritage assets.

3.0 Planning Policy

This section sets out the most relevant national and local planning policy concerning the proposed development.

3.1 General Policies

National Planning Policy Framework (2019)

The National Planning Performance Framework (NPPF) was published in February 2019 and supersedes previous versions of the document. It sets out the Government's economic, environmental and social planning policies and how these are to be applied in relation to all planning applications. The general policy context for communications can be found within Sections 5 and 10, and can be summarised as follows:

- Government policy within the NPPF is to support high quality communications infrastructure and systems – this is especially relevant to smart metering, which is a Government initiative
- Government policy is to keep the inevitable environmental impact associated with electronic communications development to a minimum
- The best way to minimise environmental impact is to avoid the unnecessary proliferation of new radio masts and sites
- The starting point for planning new networks or the expansion of existing networks is therefore to use existing electronic communications sites
- Where new installations are required, as in this case, operators should look to develop well designed structures, such as those designed to blend in with the street scene or local setting

The NPPF as a whole is aimed at encouraging a more positive approach to town planning. While the NPPF builds environmental protection into the definition of sustainable development, there is also a very clear emphasis that local planning authorities should be looking for ways to help development come forward and not reject applications simply on environmental grounds. This is emphasized in paragraph 10 of the NPPF, which states that in order that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development. The NPPF recognises that this is especially relevant where a development might have other significantly important benefits such as being essential to meet, for example, enhancement and improvement to existing communications infrastructure.

The importance of the proposed development in providing the upgrading and expansion of the existing communications network is clearly an important material planning consideration as it directly supports sustainability and is also precisely the type of new digital infrastructure that the NPPF is seeking to support. The development proposed is comparatively small scale, sited where the principle of telecommunications development has been accepted, designed in a way that fits the expectations within industrial landscapes (such as the SSE site) and so should be acceptable in every respect.

However, for completeness we still highlight some of the key points within the NPPF as they help demonstrate why the application should be permitted:

- a. Paragraph 7 advises that the purpose of the planning system is to contribute to the achievement of sustainable development. It then states that: "At a very high*

level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.” [our emphasis];

- b. Paragraph 38, on “decision-making” states that authorities should “work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible”.*
- c. Paragraph 11 advises that authorities should:*
 - positively seek opportunities to meet the development needs of their area;*
 - meet objectively assessed needs unless the adverse effects would “significantly and demonstrably outweigh the benefits”;*

Paragraph 11 of the NPPF then goes on to state that approving development proposals that accord with an up-to-date development plan **without delay**; or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

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

As such, development proposals that accord with the provisions of the Development Plan should be approved without delay. In respect of this guidance, the following sections of this statement demonstrate that the proposed development accords fully with all relevant Development Plan and NPPF policies and, therefore, permission should be granted for the development.

The NPPF (2019) directly addresses the need for enhanced wireless communication services, first mentioned in paragraph 20, which states that an LPA’s strategic policies must make sufficient provision for:

- “b) infrastructure for transport, telecommunications (our emphasis), security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)”*

Leading on from this, paragraph 112 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. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time……”*

While supported, the number of base stations are encouraged to be kept to a minimum in which the efficient operation of the network can be provided. 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 requirement for the new mast in this instance is needed to provide upgraded and enhanced coverage to the cell area for existing EE customers, and the design of the tower is reflective of its size and equipment while being appropriate to the industrial

landscape of the SSE site. In this regard, all reasonable steps have been taken to minimise the visual impact of the development, so far as the technical and operational constraints allow. The proposal is considered as an acceptable design solution that, along with works at an established telecommunications site and not therefore the development of a new site, would not have any significant or demonstrable visual impact on the surrounding landscape that would significantly impact on the landscape setting of the site or general locale.

It should be noted that paragraph 116 states that “Local planning 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”.

The NPPF clearly acknowledges the benefits of modern electronic communications and seeks to encourage such development as being essential due to their role in supporting a modern economy, contributing to sustainable objectives, and enhancing local community access to a range of goods and services. Local planning authorities are advised to respond positively to proposals for electronic communications development and this must include an understanding of the associated special problems and technical needs of developing and upgrading communications networks, such as in this instance. The proposal would therefore be consistent with the aims of Sections 5 and 10 of the NPPF.

Planning Advice Note: PAN 62 Radio Telecommunications

PAN 62 refers to Radio Telecommunications and states that the NPPG (now superseded by the SPP and FPF3) considers the general siting and design principles for telecommunications. It states that such development should be undertaken in a manner that minimises environmental impact and should have a sensitive design in both urban and rural areas.

Paragraphs 8 – 17 of Planning Advice Note 62: Radio Telecommunications broadly explain how mobile networks operate. Although the operators’ networks are mature, improvements, upgrades and new sites are required for their networks for a number of reasons. For example, to increase capacity in an area of high demand, to provide new or improved network coverage in terms of quality as well as extent, or perhaps to provide coverage over a new development area such as a new housing estate or industrial park.

Paragraph 32 identifies two components associated with minimising the contrast between telecommunication equipment and its surrounding as; *minimising the contrast between equipment and people’s expectations of a particular scene and minimising the contrast between equipment and its immediate setting of background*. For example, a lattice tower generally fits the expectations within industrial landscapes.

Paragraph 33 further identifies ways in which to minimise these contrasts as follows;

- *select a shape and material appropriate to the character of the area;*
- *keep the shape simple with clean lines, and fit all the elements, such as antennas, cables and ladders within the visual envelope of the basic shape;*
- *develop a composition where the properties seem in proportion and balanced, for example masts that taper to the top are usually more acceptable;*
- *minimise the number of separate visual elements in a base station; and*

- *use regularity, order and symmetry in positioning equipment.*

Furthermore, para 34 identifies a series of options that should be considered as a guide in selecting the siting and design of telecommunications equipment in order to minimise any resultant visual contrast. The implementation of telecommunications equipment is site-specific and therefore should be considered against the site conditions and coverage capacity requirements in addition to technical constraints and landscape character. The series of options is therefore a guide or checklist rather than a sequence to be rigidly followed. The options are:

- *installing small scale equipment;*
- *concealing or disguising equipment;*
- *mast sharing;*
- *site sharing;*
- *installing on existing buildings or other structures; and*
- *erecting a new ground based mast.*

As can be seen from the above, the proposal would result in the re-use of an existing site, within an industrial landscape that reflects the designation of the site and surrounding area as an Economic Development Area, where such telecommunications development would be acceptable and the preference of the Council in respect of minimising any environmental impacts as a result of such proposals. Furthermore, the existing tower is no longer able to provide the required network operational requirements to existing customers, resulting in a 'not spot' that the proposed replacement tower would now provide coverage for. The proposal would therefore be consistent with National policy guidance as set out above.

3.2 Local Planning Policies

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'.

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.

The Development Plan as defined by the Planning Compulsory Act 2004 for Reading Borough Council currently comprises the following document:

- Reading Borough Local Plan 2019

The following policy would be considered relevant in respect of the council assessing planning applications for telecommunications development;

Policy CC1 *Presumption in Favour of Sustainable Development* emphasises that 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). 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.

Policy OU3 Telecommunications Development

Proposals for telecommunications development will be permitted provided that:

- They do not have an adverse impact on the visual amenity of the surrounding area or on the significance of a heritage asset;
- The apparatus will be sited and designed so as to minimise its visual impact by the use of innovative design solutions such as lamp column 'swap-outs' or concealment/ camouflage options; and
- Alternative sites and site-sharing options have been fully investigated and it has been demonstrated that no preferable alternative sites are potentially available which would result in a development that would be less visually intrusive.

3.3 Policy Analysis

As concluded previously, the proposal is for works at an established telecommunications site and not therefore the development of a new site, thus the consideration of alternative sites is not appropriate in this instance. As a result, it is therefore considered that the principle of telecommunications development at this location is acceptable in what is the industrial landscape setting of the SEE sub-station.

In terms of Policy CC1, this takes a positive approach to considering development proposals that reflect the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF). As highlight above, the NPPF clearly acknowledges the benefits of modern electronic communications and seeks to encourage such development as being essential due to their role in supporting a modern economy, contributing to sustainable objectives, and enhancing local community access to a range of goods and services. As such, the proposal would accord with the aims of Policy CC1 of the Reading Borough Local Plan.

In relations to telecommunications, the Adopted Reading Borough Local Plan states that *"Reading is currently relatively well provided for in respect of mobile phone coverage. However, the anticipated continued expansion of the telecommunications network is likely to require additional 'infill' coverage, much of which is likely to be within established residential areas. Given continuing advances in third and fourth-generation mobile phone technology and increasing trends to send larger amounts of information via mobile phones, additional telecommunication infrastructure will be required to facilitate this demand. This will most notably be in the form of new telecommunications 'base stations' or antennae"*.

The NPPF states that Authorities should not question either the need for, or upgrading/enhancement of, the telecommunications network for which the proposed development is to support. The proposal in this instance is to upgrade and enhance the existing cell coverage area towards the south west of Southcote and the east of Calcot. As the proposal would see the continued use of an existing telecommunications site, as opposed to a new site, it would fulfil operational requirements while ensuring that there would be no potential increased proliferation of such infrastructure within the surrounding area, which in turn has a resultant impact on the visual amenity of an area.

As the site has been used to support telecommunications equipment for approximately 15 years, and as such become established as part of the landscape setting, it is not

considered that the proposed tower, that would see an increase in height from the existing 15m monopole to a 25m lattice tower, would be less visually intrusive at this location than if a smaller mast(s) were to be located within or close to existing residential areas in order to provide the required upgrade coverage to existing customers. It is considered that this would weigh in favour of the development, as the Council anticipates that advancements in mobile phone technology and increased trends will lead to the need for new base stations on new sites.

4.0 Access

The site is located within the existing SSE sub-station site, which allows no access to the general public or unauthorised persons given the hazards associated with the site. Access to the site is by way of a locked 2m high Palisade gate/fence directly off (west) Burghfield Road. This 2m high Palisade fence continues around the entire site. The equipment would be further enclosed within its own compound 2.5m high Palisade compound measuring approximately 13.2m x 6.2m. The existing access to the site will ensure ease of access for both construction and maintenance.

Once constructed, the development will be unmanned requiring only periodic visits for routine maintenance and servicing.

In accordance with all relevant health and safety legislation and guidelines, access to the site will be restricted to authorised personnel and the routine maintenance and servicing of the apparatus will only be carried out by properly trained and qualified staff. Electronic communications base station sites are specifically designed to prevent unauthorised access by members of the public and, therefore, there is no requirement to incorporate inclusive access arrangements into the proposed layout and design of the development.

5.0 Health and Safety

Telecommunications planning guidance states that it is not for the local planning authority to seek to replicate through the planning system controls under the health and safety regime as it is a matter for the Health and Safety Executive.

The Government guidelines state that provided a proposed base station meets the ICNIRP guidelines for public exposure, then it should not be necessary for the local planning authority to consider the impacts of health concerns.

The application is accompanied by a valid ICNIRP certificate. The certificate provides assurance that the equipment complies with both national and international emissions standards and that the proposed design and location allows the equipment to be well within the parameters set by the ICNIRP standard.

6.0 Conclusion

The application is in respect of new electronic communications apparatus necessary to maintain and improve existing public infrastructure networks. The specific requirement of the operators in this instance is to provide improved connectivity and network enhancement within the cell area for both existing and new EE customers. As a result, the proposal would be consistent with the sustainable development principles of the Reading Borough Local Plan, that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF). Furthermore, the proposal would also provide communications services to the emergency services as part of the Emergency Services Network (ESN).

As highlighted within this statement, it is considered that in previously granting planning permission for telecommunications development at the site, the principle of development at this location would be acceptable. Furthermore, the proposal is for works at an established telecommunications site and not for the development of a new site, which is in keeping with policy guidance at both a national and local level. A search for alternative site is not therefore required in this instance. The existing mast would be removed, with the existing concrete base retained to host the ancillary equipment cabinets for the new tower.

The siting and design of the proposal is considered the most appropriate solution to providing the coverage requirements to the cell area, while ensuring that any environmental and/or visual impacts are minimised.

In addition to the above, the increase in height of the tower would be capable of the operators upgrade to host 5G equipment as and when required. Furthermore, the proposed tower would provide other operators future opportunity to mast share, which would support the aims of both national and local level policy to reduce the number of masts.

As a result, Reading Borough Council are requested to give all of the above matter's due consideration and timeously approve this application, subject to the attachment of any planning conditions that may be required to support the development.

The proposal is fully compliant with ICNIRP guidelines.