

Our ref. 10792/Retro/RD

Date: 20 October 2020

Chief Planning Officer
Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

Submitted via Planning Portal

Dear Sir or Madam,

**PRIOR APPROVAL APPLICATION FOR TELECOMMUNICATIONS
UPGRADE AT READING BRIDGE HOUSE, VASTERN ROAD, READING,
BERKSHIRE, RG1 8PJ (NGR: E 471790 / N 173960) (SITE REF: 10792)**

Avison Young are planning consultants acting on behalf of Mobile Broadband Network Limited (MBNL), which is a joint venture co-owned by EE Limited and H3G UK Limited, to submit the application contained herein for the upgrade of an existing telecommunications base station as proposed below.

Description of Development:

The installation of 3No. proposed antennas affixed to 2No. proposed freestanding frames and 1No. proposed support pole, the removal of 1No. existing antenna, the installation of 1No. GPS unit located on an antenna support pole and ancillary development thereto.

Enclosed you will find an application prepared on behalf of EE Limited and H3G UK Limited who are licensed operators that provide Cellular Network based upon the Global System for Mobile (GSM) standard and Universal Mobile Telecommunications System (UMTS) within the United Kingdom.

The supporting documents submitted with this application are as follows:

- Application Form (as generated through Planning Portal)
- Drawings 10792_Reading Bridge House_01, 02, 03, 06_A5

- Planning Statement (Design and Access Statement)
- Site Specific Supplementary Information
- ICNIRP Certificate

The application fee of £462 will be paid via the Planning Portal.

Should you have any queries regarding this matter, please do not hesitate to contact me, Roland Dahllöf on 0161 956 4155 or roland.dahllöf@avisonyoung.com.

Yours faithfully,



Roland Dahllöf
Graduate Surveyor
Telecoms

Avison Young
For and on behalf of Mobile Broadband Network Limited

1. DESIGN AND ACCESS STATEMENT

The following design and access statement is enclosed in support of this proposal and demonstrates the general development principles that have been adopted in the final detailed design of this proposal.

1.1 HISTORY & BACKGROUND

Everything Everywhere Limited is a 50-50 joint venture between Deutsche Telekom and France Télécom and was formed in 2010 through the merger of their respective T-Mobile (UK) and Orange U.K. businesses.

On 3 September 2010, Everything Everywhere announced that Orange would join Mobile Broadband Network Ltd (MBNL), the joint venture management company formed in December 2007 between T-Mobile UK Ltd and Hutchison 3G UK Ltd (H3G UK).

In 2016, Everything Everywhere was chosen to work in conjunction with the Home Office to deliver the Emergency Services Network (ESN), which will deliver a smarter, better and cheaper communications capability.

The proposed upgrade subject to this application is part of the operators' continuous efforts to improve the existing 3G and 4G network across the country to cater for current and future customer demands. It is evident that mobile phone usage has grown exponentially over recent years as more than 90% of the population now own a mobile phone. Customers expect to be able to use their mobile phones and tablets in all locations as these devices have become intrinsic to our personal and professional lives. UK operators are continuously trying to improve their network infrastructure in order to adapt to the changing environment and keep up with customer demands. With constant advancements in radio technology, it is therefore a natural consequence for base stations to be upgraded to accommodate newer versions of radio equipment.

As part of EE and H3G's ongoing network programme, there is a requirement for infrastructure improvements in this area of Reading and the surrounding local community. The proposed upgrade works will allow for better coverage and increased capacity to satisfy the traffic demands set by mobile users passing through this region, and will also help towards futureproofing the network to reduce the frequency of works required at the site.

Site Selection

The applicant has adopted a sequential approach to site selection which is encouraged in the Code of Best Practice for Mobile Operators and the NPPF. Efforts have been made to utilise existing telecommunications sites wherever possible to prevent the proliferation of base stations. In this instance there was a suitable existing base station in the search area that could be upgraded to accommodate the required technologies for the operator's needs. As a result, it was not required to identify alternative site options.

1.2 CONSULTATION

Due to the minor nature of the upgrade, consultation has not taken place with the ward councillors or MP. There are no schools in proximity of the site.

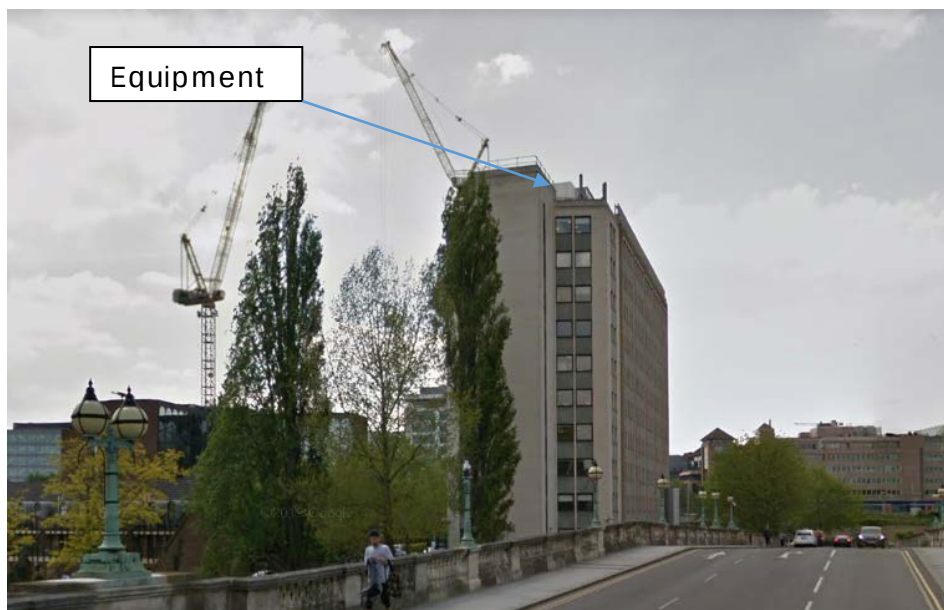
1.3 DESIGN

1.3.1 The Proposal

The application site is located at Reading Bridge House, Reading. The surrounding area is predominantly commercial with several large office blocks and Reading Railway Station within proximity of the site. The application site is an existing base station which is an established feature of this streetscape that serves as an important cell within the wider mobile broadband network due to the high density of users within this commercial district of Reading. The proposed works comprise the installation of 3No. proposed antennas affixed to 2No. proposed freestanding frames and 1No. proposed support pole, the removal of 1No. existing antenna, the installation of 1No. GPS unit located on an antenna support pole and ancillary development thereto.



View from Vastern Road to the south



View from George Street to the north



Aerial view of the site

As the proposal requires 2No. new freestanding frames and 1No. new support pole and the antennas are less than 8 metres on a building more than 15 metres in height, an application for prior approval is required.

1.3.2 Design Considerations

Siting and Appearance

The applicant has sought to cause as little impact on the visual amenity of the area as possible whilst also ensuring that sufficient coverage requirements are achieved. A further explanation of the application's technical justification is explained in a later section of this statement.

Though it is recognised that changes to a telecommunications site will to a degree be recognisable in any given environment, the acceptability of this proposal should be determined on whether any detrimental harm is demonstrable when balanced against the public benefits to be provided. It should first be acknowledged that the site is an existing base station which is an established feature of this urban street scene where telecommunications equipment is commonly found. The site was deemed acceptable by the local planning authority in its inception and sets precedence for telecommunications sites in the area.

To minimise the change in visual appearance the existing apparatus has been utilised as much as possible, although in this instance 2No. additional antennas are required in order to meet operational requirements. Consequently, 1No. proposed support pole and 2No. proposed freestanding frames are needed to support the extra load created by the additional antennas. The 1No. proposed GPS unit will be installed behind an antenna and given its small size, the impact when viewed from ground level will be negligible.

With consideration for the existing layout at present, it is acknowledged that these proposed changes will be recognisable to an extent. However, the presence of telecommunications apparatus is an accepted and established feature of this building which is an important context

to establish. In this regard the applicant does not consider the character of the area or building to be detrimentally impacted as a result of these proposed development works. The new antennas will be positioned in the same locations as the existing approximately 31 metres above ground level. When viewed in conjunction with the modern host building, and given the height of the building, it is considered that the impact of the proposal will be negligible.

Taken as a whole, the antennas will be read within the same air space across the skyline and compared to the existing site the cumulative effects of the proposed equipment is insignificant. Consequently, it is thought that the visual amenity is not detrimentally affected by this upgrade scheme. Following on from this it is recognised that the equipment can be read at height from wider vantage points, however, the setting of the application site on a modern building should be taken into consideration in the assessment of this application. Given that Reading Bridge House is approx. 31 metres high the visibility of the base station for passers by at ground level will be heavily restricted as referenced in the Google Streetview images in section 1.3.1.

In addition to this, views of the equipment will be limited from further afield due to the number of screening elements surrounding the site as referenced in the Google Maps image below.

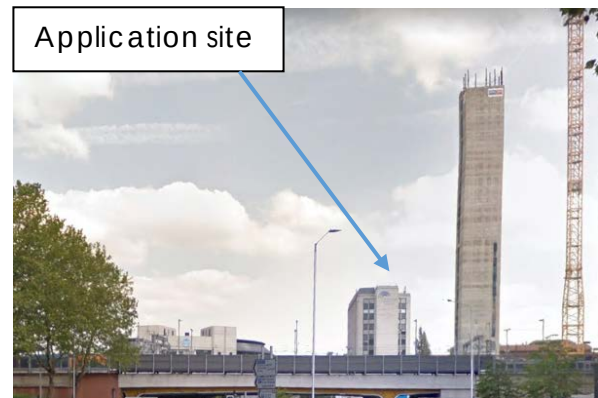


Surrounding screening elements

The applicant recognises that views of the site are achievable from a limited number of street view locations notably Vastern Road and from the north western embankment of the River Thames. However, it is considered that the visual impact of the proposal when viewed from these locations will be minimal. Firstly, views from Vestern Road are limited to the south of the railway line. From this distance it is considered that the proposed changed will be barely noticeable. It should also be noted that there is a high rise tower block under construction which will draw the viewers eye away from the site situated in the background. It is considered that the visual impact of the proposal when viewed from the north western embankment of the River Thames will also be limited as the site will be viewed in conjunction with the surrounding buildings on the southerly side of the river which are urban in nature. These points are referenced in the Google Streetview images below.



View from the north western embankment



View from Western Road

In summary the proposed design is considered to be respectful of the surrounding elements and does not cause detrimental harm to the visual amenity of the immediate environment. The siting and appearance of this proposal is therefore within the boundaries of acceptability as it will cause minimal interruption to the current landscape and is in line with the NPPF of utilising existing sites and buildings.

1.3.3 Planning Policy Considerations

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that Local Planning Authorities should determine proposals in accordance with development plan policies, unless material considerations indicate otherwise. Material considerations may include, inter alia, central government guidance, High Court and Inspector's decisions etc.

1.3.4 Local Planning Policy

The following local planning policies are relative and have been considered in the submission of this application. It is argued that the proposal is in accordance with the below policies which promote high-quality connectivity and supports new telecommunications infrastructure when it can be demonstrated that the design and siting of the base station is respectful to its surroundings.

The Reading Borough Local Plan adopted November 2019 contains the following policies relevant to this application.

CC7: Design and the Public Realm

In relation to this policy, the proposed works are of a high quality design and propose the least amount of equipment necessary to reach operational requirements. The proposal is considered to be of appropriate scale, height and layout which takes into account the existing context of the site and its surroundings. Furthermore, telecommunications development is utilitarian in nature and is therefore not imaginative modern architecture, however, conversely the 3No. proposed antennas located on the rooftop more than 31 metres above ground level are considered to cause minimal visual impact to the host building and surrounding area.

CC9: Securing Infrastructure

This policy relates to the provision of high-quality infrastructure within the Reading area. This proposal will facilitate an advancement in the telecommunications network in this area. It should be recognised that improved connectivity has a range of benefits, including increases in download speeds leading to more productive economic activity. Additionally, improved mobile network enables remote working, reducing the need for employees to travel to meetings as they can be held using digital platforms such as Zoom and Microsoft Teams. This enables businesses to be more adaptive and flexible; the importance of this has been highlighted by the current Covid-19 crisis.

OU3: Telecommunications Development

In compliance with this policy the proposal has been innovatively designed using the least amount of equipment required to reach operational needs so that the visual impact of the proposal is minimised.

In accordance with the Council's telecommunications policy, the application should be assessed favourably as the proposal is for the upgrade of an existing base station which is in line with NPPF guidance aimed at preventing the proliferation of base stations.

The site has been designed to be ICNIRP compliant. An ICNIRP certificate is provided to support this application.

1.3.5 National Planning Policy

This legislation was formally adopted in July 2018 and replaces the previous version which was introduced in 2012.

In relation to this policy the following sections are relevant in determining this application:

Section 2 – Achieving Sustainable Development

Paragraph 7 – *“The purpose of the planning system is to contribute to the achievement of sustainable development. 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.”*

The NPPF also encourages the achievement of sustainable development which can provide public benefits to building stronger and more competitive economic areas, as well as enhancing social communities through increased communication and connectivity.

Section 4 – Decision-Making

Paragraph 38 – *“Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and 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.”*

Section 6 – Building a strong, competitive economy

Paragraph 80 – *“significant weight should be placed on the need to support economic growth and productivity... this is particularly important where Britain can be a global leader in driving innovation.”*

Section 10 – Supporting high quality communications

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.”*

In relation to these paragraphs, the Government’s Industrial Strategy sets out a vision to drive productivity improvements across the UK, and sets out a delivery programme to make the UK a leader in *“artificial intelligence and big data”*. The improvement of telecommunications capacity is imperative to allow for areas to be connected, and is essential for economic growth.

Paragraph 113 – *“The number of radio and electronic communications masts, and the sites for such installation, 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... 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.”*

In relation to this paragraph, it is demonstrated that a sequential approach to site selection has been adopted to ensure that existing telecommunications installations have been explored in the first instance to prevent the proliferation of masts. A suitable existing base station was identified in this instance.

Paragraph 114 – *“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 structure interfering with broadcast and electronic communications services.”*

Paragraph 115 – *“Applications for electronic communications development (including applications for prior approval under the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development. This should include:*

- a) The outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed near a school or college, or within a statutory safeguarding zone surrounding an aerodrome, technical site or military explosives storage area; and*
- b) For an addition to an existing mast or base station, a statement that self-certifies that the cumulative exposure, when operational, will not exceed International Commission guidelines on non-ionising radiation protection; or*

- c) *For a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure and a statement that self-certifies that, when operational, International Commission guidelines will be met."*

In relation to this paragraph, the site is not located within 3km of a statutory safeguarding zone surrounding an aerodrome, technical site or military explosives storage area, or within close proximity of any schools or colleges. An ICNIRP certificate is provided with this application to confirm that the proposal will not exceed International Commission guidelines. As the scheme is utilising an existing base station, it was not necessary to identify alternative site options.

Section 12 – Achieving well-designed places

Paragraph 124 – *"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 relation to this paragraph, the application seeks to upgrade an existing telecommunications site located on Vastern Road and the proposed equipment is the least amount possible to allow the site to transmit sufficiently; we therefore consider this design to be respectful to the character of the area. Although the site's change in appearance will to an extent be recognisable features of this street scene, efforts have been made to limit the visual impact on the surrounding amenity.

1.3.6 Technical Justification

In the assessment of this application, material weight should be given to the public benefits that will be provided to local residents and visitors in this area. The site will form part of an improved coverage network to allow for faster download speeds and better signal.

Coverage

The licence granted to EE and H3G demands that strict coverage qualities are met nationwide. It is essential that the benefits of mobile phones are available across the population. Mobile networks are constantly reviewed to ensure that there is adequate coverage and capacity to meet customer demands. In the current environment there is an expectation for signal coverage to be available at home, in the workplace, while shopping, enjoying leisure activities or in transit.

Quality

In order to ensure there is sufficient coverage within buildings such as homes, shops, offices etc. the radio signal has to be of adequate strength to penetrate walls. In urban and suburban areas a dense network of base stations is therefore required, which are sometimes less than 1 km apart. The improvement of 3G and 4G signal in this area will encourage economic advancement in accordance with the NPPF which seeks to develop connected environments.

Capacity

The upgrade of telecommunications masts across the country is an inevitable consequence of the continued growth of mobile phone usage. More sites are required to address the increasing traffic demands of each mobile user for tasks such as video or music streaming. Each cell or

base station is limited to handling a finite number of calls meaning that areas of high usage will require additional cells to meet network demands and avoid congestion.

The Radio Implication of the Site

Radio signals are transmitted through the network by using fixed links at such frequencies that necessitate an uninterrupted line of sight. To achieve this, the installation must reach a sufficient height above surrounding buildings and trees. The installation must also be in a position to provide strong radio coverage to the target area that can also be received inside buildings.

The radio planning tool identifies deficiencies in the network and predicts the location from which the optimum coverage will be provided. Within these areas existing base stations are selected for an upgrade. The proposed installation subject to this application stems from this process where it is imperative for mobile operators to provide high quality coverage to its customers. This is achieved through the improvement of existing network infrastructure and introduction of new base stations to fill in blank spots.

1.3.7 Health and Safety

The proposal for this site has been designed within International Commission on Non-Ionising Radiation Protection (ICNIRP) public exposure guidelines and therefore Health and Safety concerns should not be a planning consideration. An ICNIRP certificate is submitted with this application.

2. CONCLUSION

A requirement for improved network coverage has been identified in this area. This is an upgrade of an existing site which will provide essential services for residents and businesses within the immediate vicinity. The proposed works have been designed sensitively in consideration for the character and appearance of the surrounding area in which the least amount of works has been proposed to minimise the visual impact of the proposal.

The applicant considers the proposal to be an acceptable development which should be viewed favourably by the local planning authority.