

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Novotel Hotel	Site Address:	Novotel 25 Friar Street Reading Berkshire RG1 1DP
NGR:	E:471462 N:173612		
Site Ref Number:	CTIL_150625_VF_88730_TEF_N/A	Site Type: ¹	Macro

2. Pre-Application Check List

Site Selection (for New Sites only)

(would not generally apply to upgrades/alterations to existing sites including redevelopment or replacement of an existing site to facilitate an upgrade or sharing with another operator)

Was an LPA mast register used to check for suitable sites by the operator or the LPA?	Yes	
If no explain why: N/A		
Was the industry site database checked for suitable sites by the operator:	Yes	
If no explain why: N/A		

Site Specific Pre-application consultation with local planning authority

Date of written offer of pre-application consultation:	27/07.2020
Was there pre-application contact:	No
Date of pre-application contact:	N/A
Name of contact:	N/A
Summary of outcome/Main issues raised: No response received at the time of making the application.	

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
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¹ Macro or Micro

Outline Consultation carried out:

Prior to the submission of this application the applicant-initiated pre-consultation discussions with the local planning authority and stakeholders. This provides an opportunity for the LPA and stakeholders to discuss the development proposals and identify specific issues early.

Consultation with Abbey Ward Councillors, Matt Rodda MP. Pre-application consultation letters and drawings of the proposals were sent on the 22.07.2020.

Summary of outcome/main issues raised (include copies of relevant correspondence):

No site specific comments at the time of making the application.

School/College

Location of site in relation to school/college (include name of school/college):

- Greyfriars Day Nursery

Outline of consultation carried out with school/college (include copies of main correspondence):

Pre-application consultation letters and drawings of the proposals were sent on the 22.07.2020 to the Manager.

Summary of outcome/main issues raised (include copies of main correspondence):

No site specific comments at the time of making the application.

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:		
N/A		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	02.10.2020 (via Special Delivery Track and Trace WM487186797GB and Email – Copies of the notice and receipts form part of the planning submittal pack)	

3. Proposed Development

The proposed site:

The site

This application relates to a new telecommunications installation at Novotel Reading shown on the photograph below:



Image 1: The application site

The proposed works comprise the installation of 6 no. pole mounted antenna (top height of mast 42.30m AGL / 2.20m AGL), 2 no. transmission dishes and ancillary development thereto.

Novotel is a large hotel building with a bold, modern form and appearance which forms which fronts Friar Street, a secondary shopping street within the town centre.

Novotel is an unlisted building and is not within a Conservation Area. The nearest listed building is some 100m east.

The application will replace a former rooftop radio base station on Friar Street Shopping Centre which has been decommissioned as part of the comprehensive redevelopment of Reading town centre. Coverage is currently being provided by two temporary sites in Gerrard Street. The operator therefore has no security of tenure and there is therefore an urgent need to provide permanent replacement coverage as soon as possible, as the

operator's customers will soon be unable to utilize their handheld devices in this cell area contrary to the operator's legal requirements to provide a service and the customers reasons for purchasing their handheld devices. A replacement installation in this location will ensure that the latest high quality 2G, 3G and 4G service provision is maintained and enhanced with new 5G services in and around Friar Street and Reading Station and railway line. In line with both operator's joint agreement, this replacement site will ensure that Telefonica as well as Vodafone will be able to utilise this site.

The proposed development is within the limits set out in Part 16 for permitted development with Prior Approval. The location enables the whole of the surrounding area to benefit from improved 5G network coverage and has been designed to be future proof, thus enabling other technologies to be deployed depending upon the demand required. As the shift in demand is expected for the foreseeable future and that as central Government considers digital communications to be a critical national infrastructure, the operator intends to support customers and local residents by ensuring as little disruption as possible.

As 5G is to deliver new technology, so too the infrastructure required is different than that necessary to provide the previous generations of connectivity.

The Covid-19 pandemic has created unparalleled demand and pressure on the operator's network while people try to keep life and the economy moving through isolation and containment measures, with many people now working from home or remotely. This is a perfect example of why the operator must continue with its rollout as streamlined as is possible.

For the first time in history, all of the mobile networks sent out a government message to their customers with details of the new shutdown measures. The message from 24 March 2020 reads: 'GOV.UK CORONAVIRUS ALERT. New rules in force now: you must stay at home. More info and exemptions at [gov.uk/coronavirus](https://www.gov.uk/coronavirus) Stay at home. Protect the NHS. Save lives'. Even the World Health Organisation launched a WhatsApp chatbox allowing people to get instant information about the coronavirus through the smartphone messaging application. None of this would be possible without the physical infrastructure associated with mobile phone industry such as masts, antennas, microwave dishes and cabinets.

The importance of mobile connectivity during the pandemic was reinforced by DCMS in succinct advice to local authorities and operators published on 02/04/20: 'Government recognises the ongoing importance of the telecommunications industry at this critical time. Now, more than ever, the country is reliant on fixed line and mobile communications networks. Telecommunications has therefore been included as one of the critical sectors in new government regulations and legislation in response to dealing with the COVID-19 outbreak.' The advice sets out (albeit in relation to emergency access provision) that 'Fully operational telecommunications infrastructure is needed to support mass homeworking and critical connectivity to emergency services and hospitals. Network operators must be able to rectify network outages promptly and to mitigate any effects of network degradation over the duration of this emergency period.'

On 13/05/20, MHCLG advised that 'site visits and the use of digital technology and virtual meetings should become the norm in planning casework.' (MHCLG coronavirus update 13/05/2020). Lord Greenhalgh clarified: 'Local planning authorities and the Planning Inspectorate drive the planning process forward and should ensure that it continues to operate effectively to support economic recovery. Moving to digital events and processes will be critical. This means adapting to working virtually, including virtual hearings and events (such as using video-conferencing and/or telephone) and making documents available for inspection online. The Government expects everyone involved

in the planning process to engage proactively.' (MHCLG Written Statement HLWS231, 13/05/20).

Given the increasing extent of mobile only online access in households across the UK, the importance of continued mobile connectivity is highlighted to enable public participation in planning committees and other online activities, for example.

In a statement issued 22/06/20, MHCLG confirmed measures to "enable development which has already received the grant of planning permission or listed building consent and would lapse between 23 March and 31 December 2020 to be extended until 1 April 2021".

Digital Infrastructure Minister Matt Warman in his Keynote Speech at 'Connected Britain 2020' provided the latest endorsement from Central Government on the importance connectivity. He stated:

"The theme this year is the future of UK connectivity. But before I talk about that, I'd like to take this opportunity to thank everyone in the industry for their tireless efforts at keeping us all connected through an unprecedented period of disruption.

You have kept school children connected with their teachers, allowed isolated grandparents to speak to their grandchildren, and enabled great British businesses to power the economy through these difficult times. Without a good connection, I would not be able to join you all at Connected Britain. Thank you.

In my speech, I am going to touch upon the exciting work that the Government is doing on broadband and 5G, and also the efforts that we are taking to make these networks more secure for the long term.

But, first, I thought that I would reflect on the changed times that we are living in. COVID has altered the way we live, work and, most importantly, stay connected with our family and friends. The digital infrastructure that keeps us all connected was essential to our daily way of life under lockdown - and is now more important than ever as we head into recovery. Many of these changes - such as increased working from home - will stay with us for the foreseeable future.

People in this sector have long referred to the internet as "the fourth utility" - and it's true. For countless people across the country, having fast and reliable broadband and a good mobile connection is as essential and vital to our daily lives as gas, water and electricity".

The Digital Infrastructure Minister stated that underpinning the Government's connectivity ambitions would be a Digital Strategy which will set out how the Government will drive growth in the tech sector and economy, and ensure we maximise the benefits of a tech-led economic recovery.

"And to bring us full circle, at the strategy's heart will be our vision for providing world-class digital infrastructure to all, in a way that is safe, secure and built for the future".

An installation in this location will ensure that the latest high quality 2G, 3G, 4G services are maintained for Vodafone as well as new 5G services provided in and around the RG1 and Reading Station area.

Enclose map showing the cell centre and adjoining cells if appropriate:

The site is required to help fill the 2G, 3G and 4G coverage loss following the decommissioning of the former site at Friar Street Shopping Centre.

The site has been removed from the network and there is no permanent reliable coverage for Vodafone in this part of Reading. There is therefore an urgent need to provide permanent replacement coverage as soon as possible, as the operator's customers will be unable to utilize their handheld devices in this cell area when the site is removed and this is contrary to the operator's legal requirements to provide a service and the customers reasons for purchasing their handheld devices.

A replacement installation in this location will ensure that the latest high quality 2G, 3G, 4G for Vodafone is maintained and enhanced in and around the RG1 area of Reading. In addition, the replacement site will provide new 5G services for both operators.

The operator is seeking to replace the former installation on Friar Street Shopping Centre to enable enhanced 2G, 3G and 4G coverage and capacity to the surrounding area as well as new 5G services for Vodafone to ensure high quality customer experience is obtained as demands on the network increase and technologies change.

The 3G and 4G provision allows internet access, video calling, data downstreaming, accessing social media networks and emailing to name just a few of the benefits. Therefore, to maintain high quality indoor 3G and 4G services in to this area would promote activity in line with the general population demand as the ownership of smart devices increases. 5G will deliver unparalleled speeds and capacity, with significantly reduced latency, which will be needed to deliver numerous innovative applications from autonomous cars to Internet of Things.

A permanent replacement site in this location will ensure that the security of the latest technologies will be provided into the network particularly for the data hungry applications of the latest smart hand-held devices. The operators have followed a sequential approach to site finding and identified this site as part of this process.

As an existing building, to the north of the former site will provide the necessary replacement coverage/capacity and improved services within this area of Reading.

3G and 4G signals by their very nature (as they carry high data rates) do not penetrate over long distances, (5G even less so), just a few hundred metres, depending on the topography of the land, building clutter and vegetation including trees in the area which can reduce their effectiveness.

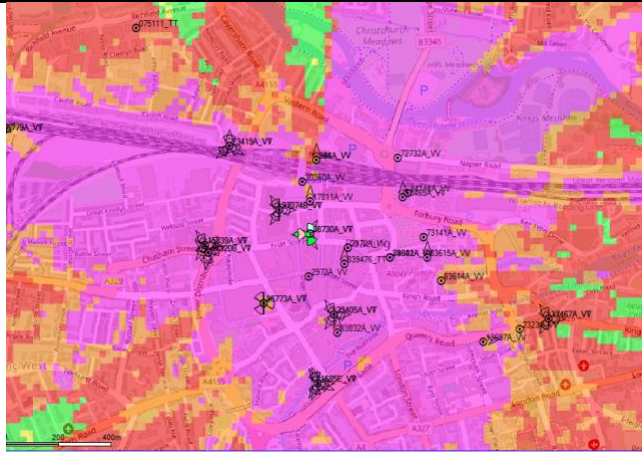


Image 2: Coverage from Novotel

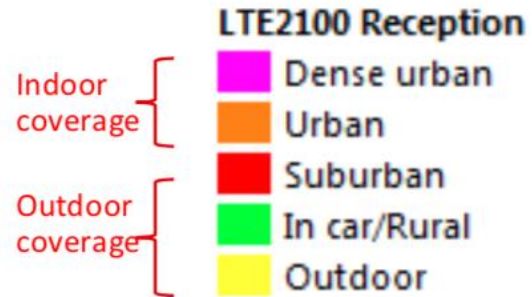


Image 3: Legend to Coverage Plots

Without this permanent replacement site at Novotel the numerous business, visitors, residents who depend on the service will notice their service sharply diminish resulting in dropped calls, the inability to make calls and non-existent or slow internet access. Clearly this would result in significant detrimental, social and economic impacts for the community should a replacement not be found and this is contrary to NPPF.

Fact sheets on Radio Planning and Propagation, 5G services and General Background Information have been attached to this application for reference.

Type of Structure: Pole Mounted	
Description:	
The proposed works comprise the installation of 6 no. pole mounted antenna (top height of mast 42.30m AGL / 2.20m AGL), 2 no. transmission dishes and ancillary development thereto.	
Overall Height:	42.30m AGL (Top height of the antenna)
Height of existing building:	
Equipment Housing:	
Length:	Internal works to plant room
Width:	Internal works to plant room
Height:	Internal works to plant room
Materials:	
Tower/mast etc – type of material and external colour:	Galvanised
Equipment housing – external colour:	Grey
Reasons for choice of design, making reference to pre-application responses:	

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 proposed works comprise the installation of 6 no. pole mounted antenna (top height of mast 42.30m AGL / 2.20m AGL), 3 no. transmission dishes and ancillary development thereto.

This permanent replacement site is required to fundamentally allow the operator Vodafone to maintain high quality 2G, 3G, 4G as well as providing new 5G services to the surrounding area.

The equipment has been designed so that it resembles as closely as possible other items of rooftop infrastructure which are commonly found within an urban streetscene.

Novotel is a modern multi-storey building. The building mass of Novotel will ensure that the antennas will not be overly visible from ground level or from the setting of the adjacent conservation areas.

The operators have chosen this building as it is as near as possible to the original building that provided high quality, advanced communications technology but is no longer available to be used and has been decommissioned. In order to provide equivalent replacement coverage, the replacement site needs to be as close as possible to the former site, so it can fill the specific hole in coverage in the operator's network.

Utilising an existing building is in complete accordance with national planning guidance, as the proposed antennas are out of the general eye line of the casual onlooker. Thus, the visual presence of the radio base station will be minimised. This is especially so as the height of the host building's main roof is 38m with the upper roof level being in excess of 44.00m AGL. The top height of the antennas is 42.30m. Therefore, the antennas will barely be noticeable once in situ even if the general public were to crane their necks upwards in an unnatural stance to see glimpses of the new antennas. The area is already established with rooftop antennas as Friar Street Shopping Centre nearby had the operator's equipment on it, up until recently. The proposed antennas will appear very similar to these. The building mass of Novotel will also ensure that the antennas will not be overly visible from ground level.

The proposed rooftop antennas will be grouped into pairs in three areas of the rooftop on the north east, south east and south west elevations. Each pair of antennas will be fixed to a free standing frame. Adjacent to the antennas are the transmission dishes.

The transmission dishes will be 0.3m in diameter. Transmission dishes require a clear line of sight to link up to the network. Otherwise the antennas would not be able to transmit their signal. Given their siting and distance above ground level they will not appear obvious in the streetscene.

The equipment cabinets are located within the existing plant room and as such there will be no impact from any external vantage points.

The height and position of the antennas on the building are so that they can be justified from a technical perspective as the antennas need to clear the immediate roof so as not to create signal clipping and reflection. The height of a proposed antenna has to be offset against its

positions on the roof, whereby the closer to the centre of the roof of the building the more height that is needed to clear the immediate roof space in front of the antenna. Furthermore, the additional height is required in order to avoid ICNIRP issues, which would sterilise a large part of the rooftop at lower levels. The pole mounted antennas enable the operators to provide the multiple technologies and meet their full coverage requirements to the target area within the permitted ICNIRP guidelines.

Furthermore, if the antennas were to be any lower, they would be blocked from obtaining a clear line of sight and therefore would not be able to operate effectively reducing the ability of the antennas to provide 3G, 4G and 5G coverage to the immediate area.

The height is a direct requirement due to the fact that the taller a site the further it can send signal and this negates the need for additional sites to pick up the shortfall.

A number of alternative designs have been considered as set out below:

Reduce antenna numbers	Due to the technical requirements for Vodafone, the number of antennas cannot be reduced. 6 no antennas are needed here to maintain existing 2G, 3G and 4G coverage as well as provide new 5G services for Vodafone, thus a reduction in antenna numbers is not possible.
Face mounted antenna on plant room	Antennas could not be face mounted on the plantroom as this would not be ICNIRP compliant – people would not be able to walk in front of the antennas - and would not ensure the edges of the building did not clip the signal. The height of the antennas in the preferred design (see below) is the minimum height needed to place the antennas on the plant room and ensure both coverage and ICNIRP compliance.
Face mounted antenna on Novotel elevations	The antennas cannot be face mounted on Novotel elevations due to the glass design of the building and adjacent buildings. There is no build solution for face mounted antenna on glass fronted buildings.
Stub Mast	This type of design was not even considered for the application site but it is one of the designs available for the operators on a rooftop. Due to its bulk and industrial appearance, it is more appropriate for industrial settings. Moreover, a structural survey would need to be undertaken to confirm if the roof is able to support the weight of such a tower.
Use of smaller antennas:	The proposed antennas are 2.1m high. A top height of 42.50m to meet coverage requirements. It is not possible to use shorter antenna due to the additional frequencies that are now required to continue to provide the latest technologies and increased demand for mobile connectivity service that has been generated over the years. For example, shorter antennas would not provide the necessary latest 4G and new 5G technologies. In effect, shorter antennas would not provide all the necessary

	service provision to the surrounding area that customers have come to expect to be available whenever and wherever especially in this high density, busy part of the operators network.
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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, including next generation mobile technology (such as 5G) and full fibre broadband connections.

Placing masts near similar structures and utilising simple and unfussy designs is acknowledged in the 'Code of Best Practice on Mobile Network Development in England' to be less likely to dominate and be in discord with the landscape and as a result less likely to have a detrimental impact on the visual amenity of the surrounding area. This design is considered to be an appropriate solution and shows the applicants efforts to help mitigate the proposals impact on the visual amenity, whilst also ensuring that proliferation of masts is reduced by the utilisation of existing structures as outlined within NPPF. One of the fundamental aspects of the NPPF is a reduction in the proliferation of sites.

As noted above NPPF advises *"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"*.

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 the equipment 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 new services for Vodafone would not appear out of place within the street scene and would not be harmful to heritage assets.

Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached	Yes	
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 the site are taken into account.		
In order to minimise interference within its own network and with other radio networks, Vodafone Ltd 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's networks, 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.	
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4. 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:
A mobile phone transmitter is designed to cover a specific area and links its coverage to the next site in the network, creating a patchwork of overlapping coverage 'cells' across the country. So, if a person is on the move, the network will transfer their calls from one site to the next. However, in certain areas there will be gaps between these cells, resulting in a loss of coverage. This can be for a variety of reasons, the most common being topography or buildings which block the path of the signal. The operators' network rollout programme is designed to identify and address these gaps within their coverage and ensure that people can use their phones whenever and wherever they are. As already explained the application will replace a former rooftop radio base station on Friar Street Shopping Centre which has been decommissioned as part of the comprehensive redevelopment of Reading town centre. Coverage is currently being provided by two temporary sites in Gerrard Street. The operator therefore has no security of tenure and there is therefore an urgent need to provide permanent replacement coverage as soon as possible, as the operator's customers will soon be unable to utilize their handheld devices in this cell area contrary to the operator's legal requirements to provide a service and the customers reasons for purchasing their handheld devices. A replacement installation in this location will ensure that the latest high quality 2G, 3G and 4G service provision is maintained and enhanced with new 5G services in and around Friar Street and Reading Station and railway line. In line with both operator's joint agreement, this replacement site will ensure that Telefonica as well as Vodafone will be able to utilise this site. The National Planning Policy Framework states that local planning authorities should not question the need for the telecommunications system, which the proposed development is

to support. However, for the avoidance of doubt as set out below this new site is needed for Vodafone to maintain their existing 2G/3G/4G services as well as providing new 5G services.

Coverage maps are a useful tool for establishing network coverage in an area. They are developed using assumptions regarding the handset use, expected level of call reliability and signal loss within a vehicle or a building. However, plots only tell part of the story as even when the coverage plots provided show good coverage in an area there may still be a requirement to improve capacity and as such local network services. Coverage plots show coverage issues only; they cannot show capacity issues.

Coverage plots are attached to this application for information. They clearly demonstrate a need for this proposal. Notably, coverage plots cannot illustrate the capacity of the site which the surrounding sites are not designed to service.

The term 'capacity' refers to the fact that each case station can only provide services to a certain number of users at any one time. When this 'Capacity' is exceeded, although 'Coverage' remains present, the base station cannot provide service to any further users and calls/text/data usage would be unavailable. This is contrary to the purposes in which the operator's customers purchased their handheld devices as well as the Government's latest thinking that everyone should have access to the information superhighway wherever they are.

Further detail regarding the general operation of the network can be found in the accompanying document entitled 'General Background Information for Telecommunications Development'. In addition, fact sheets on Radio Planning and Propagation have been attached to this application for reference. This information is provided to assist the local authority in understanding any technical constraints on the location of the proposed development.

5. Alternative sites considered and not chosen (not generally required for **upgrades/alterations to existing sites** including redevelopment of an existing site to facilitate an upgrade or sharing with another operator)

In accordance with the licence obligations and advice in the National Planning Policy Framework and the Code of Best Practice in England the applicant's network rollout team investigated the following siting and design options using this sequential approach to site selection:

- Upgrading their own existing base stations;
- Using existing telecommunications structures belonging to another communications operator. i.e. Mast and/ or site sharing, co-location;
- **Installations on existing high buildings or structures including National Grid pylons;**
- Using small scale equipment; and finally
- Erecting a new ground-based mast site – (1st) Camouflaging or disguising equipment. (2nd) A conventional installation e.g. a lattice mast and compound.

Alternative site options considered and rejected are as follows:

Site Name, Address, NGR, Site Type	Reason for not Choosing
Friar's Shopping Centre Reading RG1	This is the existing NTQ site and as such is discounted as the site is no longer available.

E471350/N173675 (Rooftop)	
4 Greyfriars RG1 1NP NGR: 471273/173594 (Rooftop)	The site is too close to a planned site to the west and is the reason why it has been discounted.
35-43 Greyfriars Road RG1 1NP NGR: 471258/173758 (Rooftop)	The rooftop is too low in order to deliver the required level of coverage to the target coverage area. This site has therefore been discounted for this reason.
Celador Apartments Projection West Market Place RG1 1ET NGR: 471438/173652 (Rooftop)	The rooftop is too low in order to deliver the required level of coverage to the target coverage area. This site has therefore been discounted for this reason.
30-31 Friar Street RG1 1DP NGR: 471417/173639 (Rooftop)	The rooftop is too low in order to deliver the required level of coverage to the target coverage area. This site has therefore been discounted for this reason.

If no alternative site options have been investigated, please explain why:

Notably, as previously stated Paragraph 113 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'*.

Environmental Information (refer to Section 2 of Site Finder Report):

See below.

Land use planning designations (if Heritage Statement is required then include here or make reference to attached Heritage Statement).

Relevant Planning Policy is detailed below.

Additional relevant information (planning policy and material considerations):

From the outset, it should be appreciated that irrespective of the proposed installation's use as a telecommunications base station, any change in form in the streetscene will always be, to some degree, a noticeable alteration to those residents and regular passers-by found closest. However, it should be recognised that visibility or a development's siting and appearance, does not automatically result in an overwhelming adverse harm or indeed significant harm to heritage assets.

In light of the above it is considered that the planning assessment of this case should concentrate on whether the proposed installation in terms of its siting and appearance are significant as to outweigh other material planning matters.

National Planning Guidance

Planning policy is provided at the national level by the National Planning Policy Framework (NPPF). It is a material consideration in planning decisions. The NPPF is pro – development with a 'presumption in favour of sustainable development' being seen as a golden thread, running through both plan making and decision taking'.

The thrust of this guidance is positive and a reminder to LPAs that we need to build the requisite infrastructure to enable economic growth.

It is not necessary to quote extensively from this document but the following points are highlighted.

National Planning Policy Framework (February 2019)

The government's National Planning Policy Framework (NPPF) was published on 24 July 2018 and updates the 2012 version. In February 2019 the NPPF was revised again, with minor alterations to wording relating to housing supply and not any parts relating to telecommunications. The Government's latest thinking continues to strongly support communications infrastructure. The NPPF remains very supportive of high-quality communications. Indeed, a whole chapter is dedicated to high quality communications, emphasising the importance that the Government attaches to digital connectivity. Paragraph 112 states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. This wording echoes guidance set out in paragraph 42 of the 2012 version of NPPF. However, it also includes the importance of *reliable* communications infrastructure for both economic growth *and social well-being*.

The NPPF continues to support the expansion of electronic communications networks at paragraph 112. It notes that 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. The economic and social benefits of providing high quality and reliable communications infrastructure are well documented and can be found later in this Supporting Information Statement.

The NPPF makes reference to 5G:

'Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G)...

With the above in mind, the Government is already forward thinking the evolution of data networks and seeks planning decisions to take account of this. 5G technology provides increased speed of data and more capacity in the network, to ensure that handheld devices can continue to be used for the purposes in which they were purchased. This will bring even greater economic and social benefits to the area.

Paragraph 113 of the NPPF retains the requirement to minimise the number of installations consistent with the efficient operation of the network but also includes being consistent with the needs of consumers and providing reasonable capacity for future expansion.

Paragraph 116 of the NPPF retains the guidance set out in paragraph 46 of the 2012 NPPF version which relates to determining 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.

At the heart of the NPPF is the retained presumption in favour of sustainable development (para 11). For decision-taking this means 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 the application of policies within the revised Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed or any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the revised Framework taken as a whole.

The NPPF continues to provide guidance on decision-making. At paragraph 38 it states that:

'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...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'.

The NPPF builds on the aspiration to build a strong, competitive economy. Paragraph 80 states:

'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking in to account both local business needs and wider opportunities for development. The approach taken, should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation⁴⁰'...

Footnote 40 of the NPPF states:

'The Government's Industrial Strategy sets out a vision to drive productivity improvements across the UK, identifies a number of Grand Challenges facing all nations, and sets out a delivery programme to make the UK a leader in four of these: artificial intelligence and big data; clean growth; future mobility and catering for an ageing society. HM Government (2017) Industrial Strategy: Building a Britain fit for the future'.

The NPPF provides guidance on proposals affecting heritage assets. Paragraph 189 states that 'in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

Paragraph 190 goes on to state that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset).

The NPPF goes on to provide guidance on considering the potential impacts of development on heritage assets. Paragraph 193 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Paragraph 196 retains advice provided in the 2012 version of NPPF relating to the degree of harm. It states that 'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

The proposed development accords with all these aspects of the NPPF in that it will provide Vodafone with continued and improved network provision within the RG1 area of Reading bringing a range of associated economic and technical benefits.

Public benefits are defined within the NPPG and could be anything that delivers economic, social or environmental progress. Benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.

Code of Best Practice on Mobile Network Development in England (24 November 2016)

The Code of Best Practice has been fully revised in November 2016 and is now even more supportive of mobile network provision in line with Government aspirations that everyone should have access to the information super highway no matter where they are located whether that be in rural or urban areas. This Code provides guidance to mobile network operators, their agents and contractors and equally to all local planning authorities in England. It supersedes the Code of Best Practice on Mobile Phone Network Development (2013).

The principal aim of this Code is to ensure that the Government's objective of supporting high quality communications infrastructure, which is vital to continued economic prosperity and social inclusion for all, is met. The development of such infrastructure must be achieved in a timely and efficient manner, and in a way, which balances connectivity imperatives and the economic, community and social benefits that this brings with the environmental considerations that can be associated with such development. The Code also has an important role in making sure that appropriate engagement takes place with local communities and other interested parties.

Section 2 of the Code highlights the Government's Communications Policy and Planning Policy. It acknowledges that the continued expansion and development of mobile networks is a key element of the National Infrastructure Delivery Plan 2016 – 2021. This recognises that digital communications are now a crucial component of everyday life, with improvements in connectivity being key to a vibrant economy (para 2.1).

Paragraph 2.2 goes on to state that consumers, businesses and public bodies increasingly rely on mobile communications and expect to receive a signal wherever they are. The Code indicates that recent changes in planning policy [and regulation] are intended to align with Government communications policy, where the ultimate goal is to achieve mobile coverage wherever it is needed.

Section 2 of this Code also reiterates NPPF guidance in strongly supporting high quality communications infrastructure, which is seen as essential for sustainable economic growth.

Section 3 of this Code acknowledges that there are special operational and technical considerations associated with mobile network development, which have changed over time

due to changes in technology and associated changes in demand. The Code acknowledges that there remains a reliance on radio masts to provide the main umbrella of coverage. Paragraph 3.1 explains that radio signals operate like light and must “see” over the target coverage area, they cannot be hidden and so there will always be a degree of visual impact.

Paragraph 3.2 clearly indicates that in assessing the visual impact, greater emphasis than previously should now be placed on the radio planning requirements to achieve mobile coverage (as shown in the recent changes to permitted development rights, at the end of November 2016, and the reduced test in the most recent NPPF).

Paragraph 3.3 goes on to highlight that the [operator systems tend to be demand-led or to fulfil coverage obligations. With the ever-increasing demand for data hungry applications available to a range of connected devices, such as smart phones and tablets, the requirement to upgrade and improve networks through changes to existing sites and the development of new sites is constant. As most parts of the country move on to a superfast highway, so the need to bring coverage to ‘not spots’ (i.e. areas where there is no mobile coverage from any operator) and improve coverage in ‘partial not spots’ (i.e. where there is some coverage but not from all operators) intensifies.

Paragraph 3.4 of The Code provides advice to local Planning authorities who are concerned about proposals, stating that they should not ‘look for problems’ but should work proactively with the Mobile Network Operators to find solutions, in line with paragraph 187 of the NPPF.

Section 4 of the Code sets out the evolution of mobile networks from 2G voice calls and text to 4G superfast mobile broadband which are now approximately the same speeds as fixed broadband connection.

Paragraph 4.1 of the Code acknowledges that customer expectations have evolved with technology. The expectation is that they will always be connected and able to access services in exactly the same way as fixed broadband for personal, educational and business purposes.

Paragraph 4.2 acknowledges that data, i.e. using the internet, puts increased demand on capacity and therefore the need for additional base stations to keep abreast of customer demand. Also, 3G base stations, originally using higher frequencies didn't travel as far and therefore each base station covered a smaller area. However, changes in working practices for the operators, in line with national guidance, streamlining networks, sharing base stations has reduced the overall amount of infrastructure required.

The Code goes on to acknowledge that operators maximise the use of their existing network infrastructure for the provision of 4G services and are similarly upgrading their 3G network infrastructure to improve capacity and coverage. However, the revised Code continues to advise that this does not mean that there will not be a need for any new base stations. Indeed, for example, more base stations will be needed in areas where there has previously been only limited or no coverage and where coverage and capacity needs to be enhanced in line with Government commitments and customer demand.

Similarly, some new sites will be required to replace existing sites that are lost, for example, through redevelopment of an existing building. Some masts may need to be redeveloped or replaced to enable an upgrade in services to take place.

Section 5 relates to mobile connectivity in the 21st Century, explaining that mobile phones and other devices are now everywhere. Mobile connectivity is not just making calls and texts but also mobile broadband. The majority of mobile phones in the UK are Internet-enabled

smartphones and large numbers of people also now own tablet devices. People are increasingly choosing to access the internet using a mobile device even when they have fixed broadband connection available.

The Code acknowledges that by the second decade of the 21st Century, the greatest increase in traffic across mobile networks was in data i.e. internet use (para 5.3). Paragraph 5.4 states that in terms of the wider economic impact of mobile connectivity, research by Deloitte on the economic impact of mobile broadband across a range of countries, showed that a doubling of mobile data use leads to an increase of 0.5% in the Gross Domestic Product per capita, while another study put the benefit of 4G mobile broadband to the UK economy at £75 billion over a decade.

Section 5 of the Code goes on to highlight that connectivity promotes social inclusion. In recent years, more people rely on a mobile phone than they rely on a landline. Furthermore, people on lower incomes are even more likely to live in a mobile only household, or to access the Internet using a mobile connection (para 5.5).

The Code illustrates that mobile connectivity helps in the delivery of public services e.g. to access Central and Local Government via online services, acknowledging that lives are more likely to be saved when a 999 call is made from a mobile than from a landline, Telehealth is becoming increasingly important and text message reminders also improve compliance with medication and keeping NHS appointments.

Good mobile connectivity also promotes sustainability e.g. it reduces the need to travel and thus carbon emissions (para 5.7). The Code continues to support mobile telecommunications network as it is seen as a crucial piece of national infrastructure in economic, community and social terms (para 5.8).

Paragraph 5.9 states that there is a need to continually upgrade and improve mobile networks, which will not function without the necessary infrastructure on which they rely. This is driven by increasing consumer demand for data, improved connectivity and more capacity, together with Government aspirations for improving connectivity and coverage.

Section 7 of the Code sets out the need for all agencies to work together to deliver connectivity that is essential to the country's economy and society including Central Government which provides the overall strategy for connectivity, mobile operators to deliver the mobile network development through the planning system and helping to identify land and structures suitable for mobile infrastructure. Local Planning authorities can also ensure that the planning function works in tandem with other relevant departments and agencies such as their own economic development departments and appropriate digital connectivity teams in order to facilitate digital connectivity.

The Code provides guidance on siting and appearance principles at Appendix A. It sets out a number of design principles in respect of telecommunications development. However, the code acknowledges that the options for design used by an operator will be affected by site conditions including requirement to link the site to the network, landscape features and coverage and capacity requirements. The main options for the operator include:

- Mast and/or site sharing (including redevelopment of a site to enable upgrade or sharing with another operator);
- Installation on existing buildings and structures;
- Erecting new ground-based masts;
- Camouflaging or disguising equipment where appropriate;
- Using small scale equipment (although small cells themselves are generally used to address capacity issues as opposed to providing coverage).

The Code in Appendix A acknowledges that it has been a long-standing Government policy objective to support the sharing of masts and sites. Operators also aim to site share wherever viable. If operators are able to share sites, and install more equipment on each site, this reduces the overall visual impact of network infrastructure, because even though shared sites will tend to be slightly bigger, it means that fewer sites are needed to improve coverage and capacity, infrastructure becomes more feasible, and is more cost-effective to deploy. In fact, sharing of sites is now the norm, and network operators now share much of their network infrastructure via joint venture commercial arrangements.

However, the Code also highlights the constraints of mast sharing. Acknowledging that mast sharing may not be an appropriate environmental or technical solution in all cases. Visual intrusion may occur. The Code indicates other constraints which may include:

- Coverage problems – The existing mast may be poorly located or not have sufficient height to give the required coverage;
- Radio interference – Antennas need a separate amount of vertical and horizontal separation. This could lead to the visual impact of the mast significantly increasing;
- Structural Loading – The existing mast may not be able to hold extra equipment. The existing mast may need to be strengthened, redeveloped or replaced with a bigger structure with a consequent effect on visual amenity.

The Code continues to support sympathetic design and camouflaging including concealing antennas in familiar features such as flagpoles, street lamp posts, telegraph pole style designs and signs.

The Code also provides advice on more sensitive locations including conservation areas and listed buildings. It states that operators may be able to avoid specific locations such as listed buildings, but not an entire protected area. In such cases, they should seek to minimise the impact through sensitive design and appropriate siting of the proposals.

Local Policy

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that “If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”.

The Local Plan for the Reading area comprises the Reading Local Plan (Adopted 2019).

The Local Plan for Reading is the document that contains the policies for how Reading will develop up to 2036, which is the end date of the plan. It identifies the amount of development that will take place, the areas and sites where development is expected to be accommodated, and where it will be restricted, and sets out policies for how planning applications will be decided.

The vision is the starting point for the Local Plan, in that it sets out how we see Reading in 2036, at the end of the plan period. Reading UK, the economic development and marketing company for Reading, has launched a 2050 vision for the town as a smart and sustainable city by 2050.

Para. 2.1.4 states: By 2050 it envisages that Reading will be a smart and sustainable city that:

1. *Shares success to support and enable thriving communities;*
2. *Delivers a real sense of place and identity;*
3. *Thrives on cultural and cross-generational diversity;*
4. *Is recognised for its heritage and natural assets;*
5. *Embeds technology to deliver innovation and low carbon living for all; and*
6. *Welcomes ethical and sustainable businesses who support Reading”.*

The Vision states (inter-alia):

“Reading will be a dynamic, inclusive community of the 21st Century. It will be a clean, green, healthy, safe and desirable place in which to live, work, study and visit. Its economic strength will be harnessed to meet the needs of all in the community. Everyone will have the opportunity to benefit from all that Reading can offer. Everyone has a part to play in shaping its future.

Reading will continue to thrive as an internationally recognised economic centre, and the core of a wider, vibrant urban area and surrounding hinterland within other authorities, that makes a vital contribution to the UK economy. It will be an environment where new business can start up and flourish. It will continue to adapt to ensure its success continues with economic changes and new working practices. The right infrastructure to enable Reading to continue to fulfil this role will be in place, and people will be able to easily move around the town with a comprehensive network of public transport, walking and cycling. The centre will continue as a regionally important shopping and business location, but its role will be widened as a place for culture, leisure and entertainment, as well as a place to live”.

Policy CC1 relates to ‘Presumption in Favour of Sustainable Development’. The policy notes 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). Where appropriate, the Council will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible.

Policy CC7 relates to ‘Design and the Public Realm requires all development to be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located.

Policy CC9 relates to ‘Securing Infrastructure’ and states that proposals for development will not be permitted unless infrastructure, services, resources, amenities or other assets lost or impacted upon as a result of the development or made necessary by the development will be provided through direct provision or financial contributions at the appropriate time.

Policy OU3 relates to ‘Telecommunications Development’ and advises that proposals for telecommunications development will be permitted provided that:

- ‘• They do not have an adverse impact on the visual amenity of the surrounding area or on the significance of a heritage asset;
- The apparatus will be sited and designed 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’.

Planning Assessment

The following paragraphs set out how the application complies with the NPPF, The Code of Best Practice and the Reading Local Plan 2019. The requirement for new capacity and coverage is urgently required (as clearly evidenced in the attached coverage plots).

The proposed equipment relocated from Friar Street Shopping Centre fully complies with the objectives of the NPPF. Government guidance states that in order to limit visual intrusion the number of radio and telecommunication masts and the sites should be kept to a minimum

consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used unless the need of a new site has been justified.

This radio base station will enable Vodafone to maintain services in the RG1 area of Reading, in line with the NPPF. The Code of Best Practice also acknowledges that new sites are necessary when existing sites are no longer available. The operators' license obligations requires them to meet customers "reasonable demand". Reasonable demand would be to provide indoor coverage as customers expect to be able to use their handsets indoors. The operators also have a competitive market driven "requirement" to provide a high-quality service.

The main matter for consideration is whether the proposed siting, size and design of the telecommunications equipment would be out of keeping with the character and appearance of the surrounding area, resulting in significant harm. Would this harm outweigh the significant social and economic benefits associated with the replacement and increased service provision attributed to the proposal and other valid material considerations as outlined within NPPF regarding a reduction in mast proliferation through mast sharing.

Principle of Development

The principle of development has been established by the Government when the new permitted development rights came in to force in November 2016, which enabled sites such as this one to be built under the operators permitted development rights, (as the column height does not exceed 25m), with prior approval for siting and appearance being the only matters that the local planning authority can take in to consideration.

Planning Practice Guidance explains how a prior approval application differs from a planning application at paragraph 28. It states that:

'The statutory requirements relating to prior approval are much less prescriptive than those relating to planning applications. This is deliberate, as prior approval is a light-touch process which applies where the principle of the development has already been established (emphasis added). Where no specific procedure is provided in the General Permitted Development Order, local planning authorities have discretion on what processes they put in place. It is important that a local planning authority does not impose unnecessarily onerous requirements on developers, and does not seek to replicate the planning application system' (emphasis added).

The Planning Portal also provides Application Type Guidance. This guidance states that:

'Certain forms of telecommunication development, for example, mobile telephone masts, are known as 'permitted development' and subject to prior approval from the local planning authority. The prior approval procedure means that the principle of development is not an issue. The LPA can only consider the siting and appearance of the proposal'.

Siting and Appearance:

The height and position of the antennas on the building are so that they can be justified from a technical perspective as the antennas need to clear the immediate roof so as not to create signal clipping and reflection. The height of a proposed antenna has to be offset against its positions on the roof, whereby the closer to the centre of the roof of the building the more height that is needed to clear the immediate roof space in front of the antenna. Furthermore, the additional height is required in order to avoid ICNIRP issues, which would sterilise a large

part of the rooftop at lower levels. The pole mounted antennas enable the operators to provide the multiple technologies and meet their full coverage requirements to the target area within the permitted ICNIRP guidelines. As such, they have been designed and sited to minimise the visual impact on the character and appearance of the area.

Telecommunications antennas are essential infrastructure to enable the mobile network to function. Similarly, plant rooms and air conditioning units are essential infrastructure but will not necessarily create places that are locally distinctive, people friendly, provide natural surveillance, nor improve the built character and quality of an area and the way it functions. Indeed, few if any essential rooftop infrastructure in the vicinity of the site enhance the character, quality or function of the area.

The installation of 6 no. pole mounted antennas designed to be as similar as possible to other roof top infrastructure found in the immediate area, will be no more at odds with the streetscene and character of the area than other existing equipment located on rooftops such as plant rooms and air conditioning units.

It is accepted that the height of the proposed installation is taller than the main roof level of the host building however it is not taller than the upper roof level and the equipment will be read against the upper levels. Telecommunications apparatus by its very nature must be taller than surrounding built and natural form to ensure its efficient operation. To suggest that it is inappropriate because it is potentially visible, (if you crane your neck in an unnatural stance), is no more relevant than suggesting that plant rooms are inappropriate because they are taller and bulkier than existing rooftops.

Reasonable consideration of the proposal in the context of adjacent rooftops can only conclude that the presence of other rooftop equipment in the immediate area only seeks to provide a setting wherein a base station may appear more congruous from which to provide an important service to a wider area.

Any potential adverse impacts of granting prior approval on the character and appearance of the surrounding area would not outweigh the benefits, when assessed against the policies in the NPPF. The proposal fully complies with national guidance set out in NPPF. Maintaining and enhancing Vodafone's existing communications networks with new 5G services is essential for sustainable economic growth, as acknowledged by the NPPF. Mobile communications network development also plays a vital role in supporting London's successful service-based industries which increasingly depend upon infrastructure facilitating rapid transfer of information and which contributes to wider planning objectives such as reducing congestion. The proposals are therefore considered to be in full accordance with Local Plan policies CC1, CC7, CC9 and OU3.

5G Coverage – Material Consideration

Mobiles can only work with a network of base stations in place where people want to use their mobile phones or other wireless devices. Without base stations, the mobile phones and other devices we rely on simply won't work.

Without this new radio base station 5G will not be rolled out in the area. If the 5G network is not available then the customers' would not be able to utilise these handheld devices for the purposes in which they were purchased.

At present, during the COVID 19 pandemic it is paramount that digital connectivity is supported and maintained throughout the country. In particular the current massive shift in user demand from city centres and places of work to residential areas and suburbs requires

an improvement in coverage and capacity throughout the whole network. The current proposal therefore provides such additional capacity to the network whilst still promoting the improved 4G technology and new 5G technology.

The demand for mobile data in the UK is increasing rapidly, and as households and businesses become increasingly reliant on mobile connectivity, the infrastructure must be in place to ensure supply does not become a constraint on future demand.

The Code of Best Practice acknowledges that upgrading and improving mobile networks will not be possible without the necessary infrastructure on which we rely. With increasing consumer demand and the Government's aspirations for high quality communications infrastructure it is ever more important to improve connectivity and capacity.

Economic and Social Benefits

It is a requirement of the Town and Country Planning Act that applications should be determined in accordance with the provisions of the development plan unless material considerations indicate otherwise and a feature of the NPPF that a balancing exercise must be carried out. Indeed, even where designated heritage assets are affected by development proposals (which they aren't in this case) it is an NPPF requirement to weigh the harm against the public benefits of the proposal, in line with paragraph 196 of NPPF.

When telecommunications proposals are considered, it is necessary to carry out the balancing exercise weighing the need for development and the magnitude of public benefits of the proposed base station against the perceived concerns about the development's visual impact and availability of alternative locations and the possibility to design the scheme differently without impacting the operational needs of the operators.

As has already been presented, there is a clear and demonstrable need for an upgraded radio base station in the area.

The NPPF strongly supports sustainable development as does the Council's Local Plan. Mobile communication plays a significant role in sustainable development. Being able to access the internet via a mobile device allows people to access a wide range of central and local government services, buy groceries, manage finances, apply for jobs/university, and carry out school projects, send emails, download applications, send and receive instant messages, streaming and downloading data to name just a few of the benefits of being able to use an internet enabled handheld device. It also allows people to work from home or on the move without needing to return to the office. This reduces travel time, carbon emissions and increases the speed in which information is processed/shared. The proposals therefore fully comply with the NPPF and the Council's Local Plan to minimise the effects of climate change reducing the need to travel and therefore the carbon footprint.

There have been numerous appeal decisions where the Inspector has attached significant weight to the benefits, alternative options, technical constraints and NPPF in a balancing exercise of all the valid material considerations, including visual impacts and the impact on residential amenity.

It is therefore clear that the Government places significant importance on reliable communications and as such the Planning Inspectorate gives significant weight to the public benefit arising from local service provision. The issue of benefits and planning balance is considered in Appeal Ref: APP/L1765/W/18/3197522 Land at junction of Andover Road and Athelsan Road, Winchester. The proposal related to the installation of a 17.5m street works

pole and associated equipment cabinet at land at the junction of Andover Road and Athelstan Road, Winchester.

The Inspector found at Paragraph 9 *'The Government places a high priority on the provision of high- quality communications. The National Planning Policy Framework (the Framework) at Paragraph 112 states, "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 this instance, the proposal is not so much seeking to provide significantly higher standards but to maintain recent local provision of 2G, 3G and 4G services as a result of a notice to quit from a nearby site that was providing these services. The Council has commented that service provision would be 'adequate' without the proposal, but the appellant has an obligation to provide not only appropriate coverage but also capacity for the network. I attach significant weight to the public benefit arising from the continuation of local service provision'.*

The issue of benefits and planning balance was also considered in Appeal Ref: APP/X5990/W/16/3162918, 55 – 59 Oxford Street, London, W1D 2EQ. The Inspector found at Paragraph 20:

'Whilst I have paid special attention to the desirability of preserving or enhancing the character and appearance of the conservation area, the above factors lead me to conclude that there is less than substantial harm to the character and appearance of the existing building and the Soho Conservation Area'.

The proposal related to the installation of 9 no antenna inside a 'replica' GRP extension to the plant room. Mobile connectivity is essential to the future success of the economy. The combined value of 4G and 5G mobile connectivity is estimated to add £18.5bn to the economy by 2026 (Councils and Connectivity Sept 2018). Mobile connectivity is essential to creating a better society. Digital inclusion can help people gain employment, become more financially secure and improve health and well-being. Mobile connectivity is essential to fulfilling the potential of new technologies. Innovations such as artificial intelligence and connected cars will change how we work, spend our leisure time and run our public services.

There is a demand for mobile connectivity in areas where geography, logistics or economics – or a combination of all 3, make it difficult. Mobile network capacity needs to grow to meet the demand of mobile users, who are consuming ever increasing amounts of data.

Paragraph 38 of the revised NPPF states that:

'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...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'.

Maintaining high quality 2G, 3G and 4G coverage and capacity as well as providing new 5G technology in this area fully me this part of the NPPF. The social and economic benefits are a significant material consideration which should be weighed against the visual impact associated with a radio base station in this location. HM Treasury outlined such benefits in its report *'Fixing the Foundations: Creating a More Prosperous Nation'* – July 2015. Paragraph 7.1 of the plan stated that reliable and high quality fixed and mobile broadband connections support growth in productivity, efficiency and labour force participation across the whole

economy. They enable new and more efficient business processes, access to new markets and support flexible working and working from home.

Paragraph 7.2 goes on to highlight strong support for high quality communications infrastructure. It states

'by reducing red tape and barriers to investment, the Government will support the market to deliver the internationally competitive fixed and mobile digital communications infrastructure the UK's businesses need to thrive and grow, and which will enable the UK to remain at the forefront of the digital economy. The Government is working with business so that the market can play the lead role in delivering against the ambitions set out in the Digital Communications Infrastructure Strategy, published March, of near universal 4G and ultrafast broadband coverage.'

Indeed, MPs have noted in parliament that the UK's Superfast Broadband connectivity was 'relatively poor'. As such, there is continuing and growing strong national support for high quality communications infrastructure. Further to the Government's commitment to improve connectivity, on 24th November 2016 the new permitted development rights for telecommunication operators came in to force, designed to lift the restrictions on mobile operators such is the significance and weight the Government place upon the benefits attached to modern connectivity.

In October 2016, there was also the BIG Infrastructure Group (as Chaired by MP Grant Shapps) Report release calling on operators to improve their network. This is signed and has comments from numerous MP's nationally.

A National Needs Assessment – A Vision for UK Infrastructure was also published in October 2016 ([https://www.ice.org.uk/getattachment/media-and-policy/policy/national-needs-assessment-a-vision-for-uk-infrastr/National-Needs-Assessment-PDF-\(1\).pdf.aspx](https://www.ice.org.uk/getattachment/media-and-policy/policy/national-needs-assessment-a-vision-for-uk-infrastr/National-Needs-Assessment-PDF-(1).pdf.aspx)). It sets out the infrastructure needs for the UK which includes the importance of digital technology. An extract of this assessment can be found below:

'A lack of digital connectivity has a detrimental effect on business operations, productivity and output and hence competitiveness in the global market place. Securing digital connectivity is thus critical to the UK's long term prosperity. A key challenge for the digital sector is a persistent digital divide between those who have access to the latest technologies and those who do not, with resulting social and economic exclusion, particularly as dependence on e-services and digital communications increases'.

The Assessment goes on to note that 'Universal digital connectivity would serve as an equaliser of economic opportunity in that it enables participation in a modern digital economy'. Therefore, this Needs Assessment further explains the consequences of a lack of coverage and the effects this has on social and economic prosperity. This clearly highlights the importance of providing new 5G services to this very busy area of the capital, where the social and economic benefits outweighed the environmental considerations.

Ministers from the DCMS and MHCLG wrote to all CEOs of Council's in England (March 2019) setting out its position in respect of supporting investment in high-quality, reliable digital connectivity. The Government acknowledges that such infrastructure is essential for communities to benefit from faster economic growth and greater social inclusion. Ministers state:

'It is essential to keep pace with growing demand for internet bandwidth and mobile data from local businesses, residents and those who visit our communities. As outlined in the Future

Telecoms Infrastructure Review, the Government would like to see nationwide full fibre coverage by 2033. We would also like the UK to be a world leader in 5G, with the majority of the population covered by a 5G signal by 2027. We are writing to ask for your help in supporting the investment necessary to achieve these objectives.

Recent years have seen substantial investment in mobile and fixed digital infrastructure across the UK.

While mobile coverage across the UK has been significantly improving, there are still too many areas where coverage is poor. The UK has now achieved 95% superfast broadband coverage but still only 6% full fibre coverage.

We need to create the market and policy conditions necessary to support the large-scale commercial investment required to extend and future-proof digital connectivity. A key part of this is making it easier for operators to deploy infrastructure. To help to achieve this, the Government recently reformed the Electronic Communications Code - the statutory framework which underpins agreements between communications network providers and those in both the private and public sector who can provide sites for the installation of network equipment. The purpose of the reforms was to make it easier and more cost effective for communications network providers to deploy and maintain digital infrastructure.

Local authorities have an essential role to play as site providers. As Chief Executives, you can support investment in digital communications infrastructure by ensuring your organisations have policies and procedures in place that promote effective engagement with the digital communications industry and minimise barriers to deployment'.

The radio base station installation in this location will allow Vodafone to provide 5G mobile communications supporting the Government's aim of 'focusing on ensuring that everyone is connected to the information superhighway'. This fully meets the aspirations of the NPPF and the Council's Development Plan in general terms, its vision to provide a high quality of life for all, helping businesses to thrive, the economy to grow, investing in infrastructure benefitting new and existing residents, connecting people to services ,facilities, economic opportunities to meet everyday needs and promoting sustainable development.

At present, during the COVID 19 pandemic it is paramount that digital connectivity is supported and maintained throughout the country. In particular the current massive shift in user demand from city centres and places of work to residential areas and suburbs requires an improvement in coverage and capacity throughout the whole network. The current proposal therefore provides such additional capacity to the network whilst still promoting 5G technology.

In respect of 'Connectivity and COVID 19, the Mayor of London has provided guidance on 'London's access to mobile and broadband networks', stating:

We know that with lots of Londoners now having to stay at home, people have lots of questions about whether mobile and broadband networks will be able to cope as more of us are now working from home.

Both mobile and fixed networks are built to support peak times. The types of application that people use heavily at peak times, during evenings at home, such as Netflix, Amazon Prime, Sky Go and other streaming or gaming services, use much more bandwidth than typical working tools like emails, voice and video calling.

There is enough capacity in the system to cope with many more people working from home, even with the significant increases in home working we are seeing due to coronavirus (COVID-19) impacts.

If many engineers are ill or required to isolate, broadband providers may have to prioritise repairing faults over new connections. However, operators have been considering this for some time and have been developing plans for coping with such a situation'.

The Major for London, listed various guidance including:

Below we have provided a list of guidance from various operators:

Operator guidance

On 10 April, through a joint statement with Government, the UK's major internet and mobile companies have agreed to work with NHS England and NHS Improvement, and NHSX to:

- *Offer identified NHS frontline staff, who are existing customers, the mobile data access, voice calls and text they need, at no extra cost, on their personal mobiles used for work purposes, to enable the staff to work remotely without fear of extra charges and limitations;*
- *Ensure NHS clinicians working from home have, wherever possible, prioritised broadband upgrades to superfast or other improvements they might need, in order to perform tasks, such as consultations carried out via video conferencing and to download/upload large medical files. Clinicians with slow or standard broadband speeds, for example, would be eligible to be upgraded to superfast speeds where their current connections are insufficient. Some providers will upgrade customers who are NHS workers on to faster speeds without any extra charges.*
- *Improve connectivity in care homes that have slow, or no, broadband connections, wherever possible; and*
- *While patients having remote consultations will get the best experience on a fixed broadband connection, there are a small proportion of mobile-only households. Operators have already agreed generous data allowances for their vulnerable mobile customers, so that patients that can only use a mobile connection for their video consultations will have sufficient data available.*

Practical Applications of 5G Connectivity as Example of Material Socio-Economic Benefit:-

Education:

The relationship between 5G and education is evolving at a massive rate with educators exploring the relevance of Virtual Reality (VR) technologies for education and training. Crucially, VR can support remote learning, allowing students a presence in the classroom even when working elsewhere.

5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high definition images and video), increased capacity and heightened security will also allow learning on the job, thanks to technologies such as Augmented Reality (AR) goggles, which can give engineers real-time instructions on how to fix a machine on a production line, for example.

Health:

Patients across the country are now becoming accustomed to relying on remote healthcare services such as NHS 111, virtual GP appointments, and ordering online deliveries of essential medical supplies.

5G will prove critical in providing the infrastructure required to deliver remote health services over the next decade. By design, 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high definition images and video), increased capacity and heightened security are going to be fundamental in scaling the patient benefits of remote healthcare and keeping medical records secure and private. For instance, trials have shown that connecting ambulance crews to expert resources using 5G allows paramedics to work with doctors and conduct specialist procedures in real time whilst on the road.

Website

Healthcare: <https://www.wm5g.org.uk/news/why-5g-will-prove-fundamental-to-improving-healthcare/>

Connectivity: <https://www.wm5g.org.uk/news/why-great-connectivity-is-now-more-important-than-ever/>

Education: <https://www.wm5g.org.uk/news/5g-and-greater-connectivity-will-transform-learning/>

Manufacturing: <https://www.wm5g.org.uk/news/how-the-industry-is-manufacturing-a-5g-future/>

Twitter

Healthcare 1: <https://twitter.com/WestMids5G/status/1253285284910977024>

Healthcare 2: <https://twitter.com/WestMids5G/status/1253670092040294400>

Healthcare 3: <https://twitter.com/WestMids5G/status/1255059483094548480>

Connectivity 1: <https://twitter.com/WestMids5G/status/1255795552484306944>

Connectivity 2: <https://twitter.com/WestMids5G/status/1256185622693363712>

Connectivity 3: <https://twitter.com/WestMids5G/status/1257688543708811266>

Education 1: <https://twitter.com/WestMids5G/status/1258426786205118466>

Education 2: <https://twitter.com/WestMids5G/status/1260140217228570624>

Education 3: <https://twitter.com/WestMids5G/status/1260857463009665024>

Manufacturing 1: <https://twitter.com/WestMids5G/status/1262684529900376064>

LinkedIn

Healthcare 1: <https://www.linkedin.com/feed/update/urn:li:activity:6659049971247120385/>

Healthcare 2: [8583104974848/](https://www.linkedin.com/feed/update/urn:li:activity:6659049971247120385/)

Healthcare 3: <https://www.linkedin.com/feed/update/urn:li:activity:6660825929369038849/>

Connectivity 1: <https://www.linkedin.com/feed/update/urn:li:activity:6661562056208064512/>

Connectivity 2: <https://www.linkedin.com/feed/update/urn:li:activity:6661951593241423872/>

Connectivity 3: <https://www.linkedin.com/feed/update/urn:li:activity:6663455317847756800/>

Education 1: <https://www.linkedin.com/feed/update/urn:li:activity:6664195497877622785/>

Education 2: <https://www.linkedin.com/feed/update/urn:li:activity:6666089613695729665/>

Education 3: <https://www.linkedin.com/feed/update/urn:li:activity:6666624007573409792/>

Manufacturing

1: <https://www.linkedin.com/feed/update/urn:li:activity:6668451188314304512/>

The Centre of Policy Studies launched a new report entitled : 'Upwardly Mobile: How the UK can gain the full benefits of the 5G revolution' as part of the 'Speed up Britain campaign. The report identifies what the 5G opportunities are for us and what the Government needs to do so we can all benefit from this vital new technology. The report notes:

'Delays to the rollout of 5G could cost the country tens of billions of pounds in lost economic output, according to a new report by the Centre for Policy Studies. In the CPS report 'Upwardly Mobile: How the UK can gain the full benefits of the 5G revolution', former Government advisers Alex Jackman and Nick King argue that Government's 'levelling up' agenda and the UK's recovery from the Covid-19 pandemic is at risk without a faster 5G rollout – to the tune of £41 billion.

The delivery of 5G infrastructure is stalling. The set of rules meant to pave the way for the smooth rollout of the next generation telecommunication network, the Electronic Communications Code, is clearly not working as intended. Pressure on the rollout will only increase with the phasing out of Huawei from 5G infrastructure by 2027.

The report highlights that if delays continue at their current rate, by 2027, over 11 million households and businesses could be missing out on vital digital connectivity. Improving digital infrastructure supports the Government's 'levelling up' agenda, by helping local areas to retain and attract businesses and talent as well as by reducing regional inequalities. However, without reform to existing legislation, millions of households and businesses will suffer.

Using analysis by the independent consultancy Policy Points, the report estimates that if 5G coverage reaches a quarter more of the population than the Government's current target of 51%, it will produce GDP gains of £41.7 billion by 2027. It highlights that the difference between the UK being a leader and a laggard in 5G adoption could be as much as £173 billion in incremental GDP over the coming decade, as estimated by the Future Communications Challenge Group.

The manufacturing, construction and agricultural sectors have been hit particularly hard by the pandemic, and these would benefit significantly from improved connectivity. However, onerous planning rules and loopholes in existing legislation are slowing down the infrastructure upgrades needed to make the most of this mobile revolution in these much-needed industries.

To overcome these deployment barriers, Jackman and King are calling for urgent reforms to the Electronic Communications Code and national planning rules to speed up the rollout of 5G, unlock its potential and stimulate growth as the country recovers from the economic impact of Covid-19. It calls for sustained public sector leadership to deliver this, recognising that supporting digital infrastructure is one of the key things the Government can do that costs little, boosts growth and helps 'level up' the UK.

The report warns that without such efforts, the UK could miss its 2025 deadline for gigabit connectivity and 2027 target for 5G coverage, putting the potential economic gains at risk. It argues that policymakers must learn from the 4G rollout and remove the barriers to deployment. While 5G promises to create economic benefits through increased capacity, reliability and speed - vastly improving business productivity and removing barriers imposed by poor digital connectivity - the system is plagued by red tape'.

Report author, Alex Jackman, former digital adviser to the Government, said:

"Digital networks and the services they support have underpinned our resilience to Covid-19 and they will drive our recovery. By expanding them, we deliver not only immediate benefits but also the essential foundation stone for 5G. This is no time for the government to be passive on the deployment environment - the difference between the UK as a 5G pioneer and ceding leadership to others is as much as £173bn".

"Productivity gains to business, equality gains for regions and economic gains for the country are only as achievable as the networks we can access."

The Rt Hon Patricia Hewitt, Speed up Britain's Campaign Chair, said:

"There aren't many low-cost ways to unlock serious economic growth, but small changes to the Electronic Communication Code could unlock billions of pounds in our economy, drive the UK's COVID-19 recovery, and deliver significant regional growth.

"All parts of the UK can benefit from this fantastic technology – but the Government needs to act now to avoid being left behind in the digital revolution."

Minister for Digital Infrastructure, Matt Warman said:

"It is our national mission to futureproof the UK's networks with revolutionary 5G technology. Thanks to government and industry action 5G is available in more than 70 towns and cities.

"Alongside record amounts of funding, we are exploring how to bust any barriers holding back industry from speeding up rollout. We've committed to reforming planning law and to consult on whether further reforms to the Electronic Communications Code are needed and will consider the points raised in this report carefully."

It is therefore considered that the wider public benefits ensuing from the installation of equipment will outweigh the very limited harm to the street scene.

Health and Safety

The proposed installation conforms to current government planning guidelines regarding potential health effects arising from telecommunications development. The operator has attached a declaration that the site conforms to ICNIRP guidance. This is in full accordance with NPPF.

Recent court cases have confirmed that the *public perception* of health risks can be a material consideration within the land-use planning system. The weight to be attached to this issue has to be determined accordingly in each case by the decision maker. It has been generally held, and widely established at planning appeal, that health concerns are not a sufficient basis alone for withholding planning permission providing it has been demonstrated that the proposed installation will comply with the ICNIRP guidelines.

The publication of the National Planning Policy Framework continues to highlight the Government's view that the planning system is not the appropriate mechanism for determining health safeguards. It sends a clear message to local planning authorities stating that they must 'determine applications on planning grounds. They should not seek to prevent competition between different operators, question the need for the telecommunications system, or determine health safeguards if the proposal meets International Commission guidelines for public exposure'. This is reiterated in the Code of Best Practice.

In this instance, Vodafone believe that it is not necessary to consider health effects further, as recommended by NPPF. The operator is committed to ensuring that all new and existing installations are ICNIRP compliant, and consequently it is considered that there is no basis for this application to be refused on health and safety grounds or for reasons relating to public concerns about health and safety. ICNIRP compliance certificates are enclosed for the operator with this application. If required, additional information regarding the operation of mobile telephone base stations and health and safety considerations can be provided.

Summary

The following conclusions have been reached:

Policy OU3 refers to telecommunications and the operator has demonstrated full compliance with this policy.

It has been demonstrated that the proposed scheme is in full accordance with the NPPF. The very limited harm caused by the installation would not outweigh the benefits of maintaining and enhancing and providing new community facilities, and that introducing a 5G communications network in this area would bring. It has been shown that such provision is essential for sustainable economic growth and plays a vital role in enhancing the provision of local community facilities and services in accordance with the Local Plan Vision.

The proposed rooftop installation has been sympathetically designed and sited so as not to look incongruous in the streetscene and will resemble the existing rooftop infrastructure. As such, the proposed scheme would integrate well with the existing rooftops and streetscene. The antennas as such would not result in a particularly dominant structure incongruous with its surroundings. It would not cause detrimental harm to the overall character and appearance of the host building or the street scene.

The proposed scheme will not represent a prominent and alien feature out of character with the locality, by reason of its design, scale and siting.

It has been demonstrated that the proposed 42.30m height is the lowest possible that will allow Vodafone to maintain their existing services (2G/3G/4G) and obtain their required 5G services to the surrounding area. At lower heights, the antennas would be blocked by the rooftop.

There are no more sequentially preferable sites that would provide the required replacement 2G/3G/4G and 5G coverage to be provided that would cause less visual harm than this proposal.

Digital Infrastructure Minister Matt Warman in his Keynote Speech at 'Connected Britain 2020' provided the latest endorsement from Central Government on the importance connectivity. He stated:

"The theme this year is the future of UK connectivity. But before I talk about that, I'd like to take this opportunity to thank everyone in the industry for their tireless efforts at keeping us all connected through an unprecedented period of disruption.

You have kept school children connected with their teachers, allowed isolated grandparents to speak to their grandchildren, and enabled great British businesses to power the economy through these difficult times. Without a good connection, I would not be able to join you all at Connected Britain. Thank you.

In my speech, I am going to touch upon the exciting work that the Government is doing on broadband and 5G, and also the efforts that we are taking to make these networks more secure for the long term.

But, first, I thought that I would reflect on the changed times that we are living in. COVID has altered the way we live, work and, most importantly, stay connected with our family and friends. The digital infrastructure that keeps us all connected was essential to our daily way of life under lockdown - and is now more important than ever as we head into recovery. Many of these changes - such as increased working from home - will stay with us for the foreseeable future.

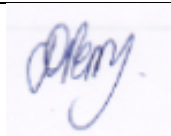
The Digital Infrastructure Minister Matt Warman confirmed the Government's position in respect of the importance of connectivity in his Keynote Speech at 'Connected Britain 2020', stating:

People in this sector have long referred to the internet as "the fourth utility" - and it's true. For countless people across the country, having fast and reliable broadband and a good mobile connection is as essential and vital to our daily lives as gas, water and electricity".

This is in full accordance with the NPPF which states that advanced, high quality communication infrastructure is essential for sustainable economic growth.

I confirm that submitted drawings have been checked for accuracy.

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		(on behalf of CTIL and above operator)	

