

SUPPLEMENTARY INFORMATION FORM

1. Site details

Site Name	Kenavon Drive	Site Address:	Kenavon Drive, New Town, Reading, RG1 3DJ
NGR	E472201 N173656		
MBNL Cell ID	RDG015	Site Type: ¹	Macro

2. Pre Application Check List

Site Selection

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	<u>No</u>
If no explain why There is no up-to-date mast register		
Were industry site databases checked for suitable sites by the operator:	<u>Yes</u>	No
If no explain why:		

Pre-application consultation with local planning authority

Date of written offer of pre-application consultation	12/03/2020
Was there pre-application contact	Yes
Date of pre-application contact	30/03/2020
Name of contact	Sian Hickey
Summary of outcome/Main issues raised: We sent a pre-application consultation email to the LPA on the 12/03/2020. It included a map showing the location of the existing and proposed upgrade sites as well as an elevation drawing of a proposed 20 metre streetworks mast. The LPA emailed us to say they charge for pre-application advice. When balancing the fees of the LPA for pre-application advice, together with those incurred for a formal planning application, the applicant have chosen not to take them up on this.	

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	AMBER
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¹ Macro or Micro

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Outline of consultation carried out

Pre-application consultation emails were sent to the Ward Councillors, MP and Highways Authority. It included a map showing the location of the existing and proposed upgrade sites as well as an elevation drawing of a proposed 20 metre streetworks mast.

Summary of outcome/main issues raised

The *name of Ward Councillors, MP and Highways Authority* responded to our consultation. *quote or summarise email*

An acknowledgement email was received from *insert name*, however, to date no site-specific comments have been received.

To date we have received no comments from those consulted.

School/College

Location of site in relation to school/college

Forbury Gardens Day Nursery is approximately 200 metres from the application site.

Outline of consultation carried out with school/college

A pre-application consultation email was sent to the aforementioned. It included a map showing the location of the existing and proposed upgrade sites as well as an elevation drawing of a proposed 20 metre streetworks mast.

Summary of outcome/main issues raised

To date we have received no comments from those consulted.

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 not a requirement of a Full Planning application		

Developer's Notice

(only required for an application for prior approval)

Copy of Developer's Notice enclosed?		No
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3. Proposed Development

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The proposed site:

Replacement of the existing MBNL base station for a 20 metre phase 8 pole with wrap around cabinet built around the base, 3no. new equipment cabinets and ancillary development thereto.

For reference only please see below a photograph of the site: -

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Type of Structure (<i>e.g. tower, mast, etc</i>):	
Description: Replacement of the existing MBNL base station for a 20-metre phase 8 pole with wrap around cabinet built around the base, 3no. new equipment cabinets and ancillary development thereto.	
Overall Height:	20 metres
Equipment Housing:	1no. APM5930
Depth:	600 mm
Width:	600 mm
Height:	1200 mm
Equipment Housing:	2no RFC5906
Depth:	600 mm
Width:	600 mm
Height:	1800 mm
Equipment Housing:	1no. MK5 LINK/AC
Depth:	500 mm
Width:	1200 mm
Height:	1700 mm
Materials (as applicable)	
Tower/mast etc – type of material and external colour:	Grey
Equipment housing – type of material and external colour:	Steel and painted Light Grey (RAL 7035)

Reasons for choice of Design
This is an upgrade proposal in which the current design of the now existing base station on Kenavon Drive lamppost has been assessed as to whether it can support the latest technologies. However, the existing mast is not an upgradable structure in its current form and cannot accommodate any further antennas. It requires redevelopment and a completely new mast, hence the proposal subject to this application. The proposed design has been assessed against the latest version of Part 16. In this instance, the replacement of an existing mast found on adopted highways controlled land can be permitted development requiring no formal application if it does not exceed the upper limit of 20 metres in overall height <i>and</i> where the width of the proposed mast does not exceed one third of the width of the current mast it seeks to replace. The replacement mast is wider to accommodate for more antennas hence the width exceeds one third, so it requires Full Planning permission. The design of the replacement pole is at a height of 20 metres so as not to compromise on the full length of each set of the stacked antennas. The antenna heights take into account the extent of nearby built and natural obstacles that they need to clear. Also, the antenna heights cater for the character of the wider area and the site's relationship with neighbouring base stations in the EE and 3 networks. The lowest possible height has been progressed here to present the optimum angle of projection that will allow the antennas to see the target audience as much as possible and so enable a reliable signal

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to propagate. Within the scope of designs that are available to the applicant, it is emphasised that the width of the pole, the number of antennas, the spacing between each antenna and the size of the mast's head frame have all been kept to a minimum. The dimensions of the proposed pole are the thinnest available to the operators, in which it needs to support the weight and dimensions of all the required antennas. Also, the girth of the steel pole allows for structural wind loading and enough space for the feeder cables to run through the structure up to the antenna at the top. With regards the choice of design the proposed pole will be Grey which is deemed appropriate within the street scene.

For transparency the proposed equipment cabinets are shown on the drawings and have been included in the description of development. The proposed equipment cabinets are less than 2.5 metres³ each, in which seen on their own merits they do not usually require a formal application as they are permitted development. The extent of ground-based development has been kept to a minimum when balanced against the technical requirements of this site-specific base station. They support multiple technologies for both EE and 3 and incorporate a power source. The sizes of the cabinets are justified as each needs to be large enough inside to ensure a satisfactory airflow around the equipment. This allows adequate cooling and in turn minimises the noise generated. Plus given their outdoor location, they have been designed to be weatherproof. The proposed equipment cabinets will be steel and painted light grey, which is considered an untoward colour in the street scene.

4. Technical information

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)*	<u>Yes</u>	No
International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines.		
When determining compliance, the emissions from all mobile phone network operators on or near to the site are taken into account.		
In order to minimise interference within its own network and with other radio networks, EE (UK) Ltd and H3G (UK) Limited operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision		

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As part of EE (UK) Ltd and H3G (UK) Limited's network, the radio base station that is the subject of this application will be configured to operate in this way. All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference. The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.		
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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

Mobile Broadband Networks Ltd is a joint venture owned by EE UK Ltd and Three UK Ltd. MBNL undertakes the management and network deployment of telecommunications sites on behalf of both EE and 3. In addition, it is of note that EE will be supporting the communications requirements of the Emergency Services where further rollout and improvements in signal are required.

Mobile telecommunications networks are now ubiquitous throughout the UK. It is an expectation that an individual can connect and use their mobile phone whenever and wherever they so require. With the advent of new technology, further advances are proposed, and Central Government has seen mobile connectivity in particular 5G, to be at the forefront of economic development. The expectations are that future technology will support government policy regarding digital inclusion; improvements in health and social care; assisting in local economic growth; advancing the development of Smart Cities and supporting innovative uses throughout the transport sector for both personal and public travel.

At the beginning of March 2017, the Department of Culture, Media and Sport (DCMS) issued an updated UK Digital Strategy with the goal of ensuring that the UK delivers

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a world-leading digital economy that works for everyone. The DCMS also sees new technology and improved connectivity and coverage as key to the future growth, both socially and economically, of the UK. In conjunction with the new Electronic Communications Code (2018), the DCMS wishes to make it easier for operators to deploy base station, upgrade and share their equipment with other operators in order to help increase coverage and capacity. At the heart of the new legislation and one of the Government's key aims is to deliver on the public benefit of having access to a choice of high-quality electronic communications services, hence the proposed upgraded installation will provide the area with EE and 3 signals, including most notably new 5G technology.

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5. Site Selection Process

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).

Cell:	RDG015			
Option	Type	Address	NGR	Reason for Discount
A	Existing MBNL Streetworks	Kenavon Drive	472203, 173655	This existing mast at this location is not an upgradable structure and cannot accommodate any further operators or equipment due to its design. It requires significant redevelopment and a completely new mast to allow for this redevelopment to take place as per the proposed application. Unfortunately, the new structure cannot be installed on exactly the same location as the existing structure as it would result in a loss of service to existing customers which is not in line with the applicants license agreement that they have with the Government.
B	Streetworks	Area to South of existing site	472205, 173643	This area is currently under construction for residential flats, and was discounted at this stage.
C	Streetworks	Kenavon Drive (north side opposite existing site)	472204, 173666	A street works style column could not be accommodated on this stretch of land due to the presence of underground services and the clearances that the utility company requires to be retained in order to access and maintain them.

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Additional relevant information:

Planning Appraisal

The main material planning considerations in the determination of this application should focus on the scheme's siting and appearance and so its effect upon the character and appearance of the area. In this respect the case should be assessed as to whether any harm caused by reason of the mast's siting and appearance is outweighed by firstly the potential availability of alternative sites elsewhere that if they exist are realistic options within the scope of this upgrade requirement and so whether they are less harmful. Also, in making a balanced assessment, it must be considered as to whether the appearance of the proposal, has been minimised so far as practicable within the constraints of the designs that are available to MBNL. Design criteria includes the mast's height and so the technical factors that have influenced its form and aesthetics must be appreciated.

At the outset and with regards siting, it should be recognised that the proposal is an upgrade and seeks to replace an existing EE and 3 base station found in the immediate locality. As advocated in NPPF, Chapter 10 – Supporting high quality communications, February 2019, a sequential approach to site selection has been taken in this case. NPPF makes it clear that the number of masts, and the sites for such installations, should be kept to a minimum, in which upgrading existing installations and mast sharing are regarded as the first approach to take rather than deploying a completely new base station.

Before deciding to pursue a completely new base station development, EE and 3 will always look at upgrading their own existing sites in their wider networks to where best possible fulfil the coverage requirements in a specific area. In this region the existing base stations in the surrounding networks have been upgraded where facilitated to accommodate the required technologies and capacity. At a localised level the existing sites in the immediate consolidated networks neighbouring the Kenavon Drive site have also been optimised to their full potential. Given their established whereabouts in the respective networks and the evolving demands of customers, this has resulted in a defined area where coverage and capacity is needed for EE and 3. In this regard, it has been found that there are no other neighbouring base stations elsewhere in the wider networks that can compensate for the cell specific requirements in this part of Reading. Therefore, when this technical requirement has arisen here and 5G is being rolled out, it has been the operators first point of focus to look to upgrade their own existing base station as this already fits into their networks plan.

This upgrade approach is consistent with the needs of consumers and the efficient operation of the specific networks when providing coverage and capacity for future expansion. Indeed, it has been embedded within telecommunications planning policy as far back as PPG8 from the early 1990s that there should always be an expectation to use existing masts, wherever practicable, to avoid the unnecessary proliferation of such development. In accordance with the operator's licence obligations, NPPF and the Code of Best Practice on Mobile Phone Network Development, MBNL have

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reviewed existing telecommunications provision operated by EE and 3 in the intended target area. An existing EE and 3 base station has been identified in which taking advantage of the MBNL agreement a sequential approach to site selection has been taken in seeking to upgrade this installation.

As noted in section 5 - Site Selection Process of this industry standard template, which derives from the Code of Best Practice then ordinarily "alternative sites considered and not chosen are not generally required for upgrades/alterations to existing sites including redevelopment of an existing site to facilitate an upgrade." This is because alternative sites would have been considered by the operator and determining planning body when this now existing base station was first conceived and established on-site. In approving it then, a formal planning assessment has judged the site of the existing mast to be an appropriate location for telecommunication development within this area. Nevertheless, to minimise coverage downtime during construction it is noted that the upgrade proposal is not a direct replacement on the exact same spot as the now existing mast, therefore the applicant have considered alternative sites that need to be within reasonable close proximity of the existing site. In doing so the applicant considers that there are no suitable alternative locations that would be far superior in their planning merits than that of the site progressed in this application. Therefore, in terms of "siting" criteria it is concluded that the location of the proposed upgrade mast is justified.

To support the site position yet further it should be appreciated that given the land use character and road layout of the wider target area, the applicant have naturally gravitated towards co-locating as near to as possible the existing EE and 3 mast that will in time be removed.

It is acknowledged that there are residential properties in the immediate vicinity, such as the need to provide coverage and capacity to the customers in this part of Reading. Nevertheless, it is felt that the identified position, height and design, when catering for any foreseen impact upon the wider residential amenity, balanced against those houses found closest would be minimal. The nearest houses are found to the opposite, however it is considered that activity on Kenavon Drive itself, the extent of boundary treatments and the distance of separation would not undermine their visual amenity when seeking out the installations presence.

From the wider area it is apparent that only the top section of the replacement pole would be visible above the immediate built and natural and so against the skyline. Therefore, when taking into account the angle of perspective, coupled with the foreground and background screening which would break up any view of the installation in its entirety, the siting of the proposal would not significantly undermine the amenity of those residents in the far wider area.

There are mature trees and foliage in close proximity of the application site in which it is considered that these natural features provide a suitable context that would help assimilate the base station into this particular environment.

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Furthermore Kenavon Drive is one of the main arterial roads that run through the target area of search, in which the proposal would be read in the context of linear street furniture, including lighting columns and telegraph poles, as well as a range of other street furniture paraphernalia including road signage, utility cabinets and railings.

In light of the above assessment, it is considered that the siting of the proposed upgrade scheme on Kenavon Drive is justified and is the least sensitive location. It is the closest site that can found to the existing mast and so it would meet EE's and 3's technical requirements, whilst minimising any resultant environmental impact so far as practicable.

Moving on, the fundamental principles applied by MBNL is always to minimise the contrast between the appearance of the site-specific upgrade proposal in its relationship with its environment, when balanced against the various reasons that have brought them to progress this particular position and upgrade design. Irrespective of the installation's use as a telecommunications base station, the change in form of an existing item of street furniture on Kenavon Drive will always be, to some degree, a noticeable addition to regular passers-by and residents found closest when seeking out its presence. However, it should be recognised that visibility does not automatically equate to an overwhelming adverse harm occurring. Furthermore, there is no "right to a view" which planning controls should seek to safeguard for the continuing benefit of an individual, except where the view from a particular location is also a valued public asset. Therefore, just because the streetworks style base station will be seen and is different to another existing item of street furniture that people have become accustomed to, then this should not automatically equate to the appearance of the mast being unacceptable. A balanced assessment should be made when considering all material planning considerations, most notably there should be an appreciation of what is achievable within the scope of telecommunication infrastructure that has ultimately influenced the scheme's siting and appearance.

With regards the appearance of the replacement base station's, then it should be appreciated that the technical requirements of telecommunication operators like EE and 3 are well documented. As previously discussed, the appearance of the base station is justified when considering the structure designs that are available in fulfilling all the technologies that EE and 3 operate on, added to their new 5G rollout. Ground-based masts may not always be reflective of the older mast it seeks to replace, installations deployed by other operators nor the immediate street furniture structures. They are intended to serve a completely different purpose and with regards more so the latter, in fact it would be extremely unrealistic to expect that a ground-based mast could replicate exactly the height, profile and aesthetics of for example an existing lamp post or telegraph pole. Simply put it would not present a viable solution that would meet the operator's technical requirements nor vice-versa would a telecommunications scheme suit a different purpose other than that which it was intended to do. It is established in planning policy, guidance and at appeals, that it is the technical requirements of the operators and the antennas used that dictate the height and design of their installations. Therefore, it must be recognised that given its very nature and technical ability, antennas need to be sited at height above the

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immediate built and natural clutter. This means the replacement mast may well be taller than existing linear features and nearfield obstacles in order to provide the necessary coverage and capacity to the intended area of Reading.

With regards appearance, it is noted that the height of the existing monopole is 12.5 metres to top. The replacement mast is 7.5 metres taller at 20 metres to top. The height of the replacement mast is justified as it has a number of stacked sets of new antennas that will be used by both operators and will provide multiple technologies, including the latest 5G signals. The overall height has been kept to its absolute technical minimum as this is so as not to compromise on the centre line of all the antennas when considering the extent of surrounding obstacles that need to be cleared. Also, the mast's height to top takes into account the extent of the target area and its topography in relation to neighbouring sites in the wider EE and 3 networks. In this regard the lowest technically possible height has been progressed here so as to present the optimum angle of projection that allows the antennas to see the target audience as much as possible beyond the immediate obstacles and so enable a reliable signal to propagate across the target area. Taking this into account and to justify the height yet further, it should be recognised that should a stacked antenna height be any lower, then this would have a direct impact on the proposed base station performance as its signals would be blocked by the immediate obstacles. To do so the base station would ill perform, its footprint of coverage would be greatly reduced, and it would result in the need for another new base station in the locality. In this respect the added height of 11.5 metres presents the optimum technical solution and negates the unnecessary need for additional base stations to serve the target audience, thus minimising the impact on the character and appearance of this area of Reading.

Another point of material note that should not be overlooked is the scheme on Kenavon Drive has inbuilt sustainable qualities as it is a mast share solution. In this respect to the untrained eye, its design gives the illusion of a lone operator base station. Indeed, this shared solution safeguards the character of the area, its street scenes and minimises the introduction of unnecessary street furniture. It negates the need for the two operators to build independent sites to meet their Ofcom licence commitments. This should be given material weight as this approach complies with NPPF regarding mast sharing and keeping the number of base station sites to a minimum.

With regards the relevant policy context, as set out in NPPF there should be a presumption in favour of sustainable development and so granting permission. In this respect in all planning determinations consideration should be given to the three mutually dependant dimensions of economic, social and environmental matters. In making decisions, the determining body should also be mindful of the position set out in NPPF, paragraph 11 that *"d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date"*, in so far as *"ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole"*. Irrespective of whether a local planning policy exists or not, specific to telecommunication or in relation to a general policy on design, it is

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apparent that material weight should be given to NPPF. Most notably Chapter 10 – Supporting high quality communications and so the contributing factors that connectivity plays in providing public benefits as set out in Chapter 6 - Building a strong, competitive economy. These chapters should be of primary importance in the determination of this case, in which it is evident that proposed scheme on Kenavon Drive is in accordance with NPPF. As alluded to previously the presence of streetworks style base stations of varying heights and designs are now commonplace throughout the UK. Over the years as new spectrums have been released and the need for greater capacity increases, operators will inevitably seek to upgrade and replace their own infrastructure to meet customer expectations and demands for connectivity. In this respect the approach to site selection here is nothing out of the ordinary and accords with NPPF in operating an efficient network and providing reasonable capacity for future expansion. The proposal remains a mast share solution and as the existing mast cannot support any further antennas its upgrade redevelopment is advocated in keeping telecommunication sites to a minimum. Such is the technical requirements to provide coverage and capacity, paragraphs 114 and 116 of NPPF acknowledges that new telecommunications development in certain areas should not be resisted as a matter of course. Similarly, the planning system should not introduce competition between different operators nor should the need be questioned. When considering the case presented then clearly the proposal is acceptable and in accordance with this planning policy stance. In this respect the Government's position on connectivity and the up-to-date NPPF, tilts the balance in favour of the development so much so that it outweighs the environmental harm that will be created by the upgraded streetworks base station on Kenavon Drive. NPPF contains the most up-to-date planning policies on the matter, however it is considered that where relevant to telecommunications development, the upgrade proposal accords with the adopted local planning policies taken from the Reading Borough Council's Development Plan.

In conclusion, material planning weight should be given to the presence of the existing mast and the pursuit of this upgrade scheme in accordance with a sequential approach to site selection. Also, the development's mast share qualities, need and the technical influences the have dictated the proposal's height and design should be taken into account. Overall, it is evident that the replacement mast will result in a minimal change when compared to the existing on-site installation which is an established feature in this area of Reading. In this respect the Kenavon Drive upgrade proposal is in accordance with the relevant local and national planning policies, when taking a balanced assessment. On the whole, any harm will be less than substantial and outweighed by the social and economic benefits.

Access Statement

Public Access Statement

Radio base stations are not designed to be accessible by the public. Therefore, no specific public access provisions are required to be incorporated into the design of the proposal. Nevertheless, it is noted that the Kenavon Drive upgrade proposal is located on adopted highways controlled land and so the development will be accessible within the public realm. However, access to the ground-based equipment can be likened to

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other telecommunication infrastructure of a similar nature or utility cabinets found in typical street scenes. In this respect, should the need arise then access to the site will be primarily by foot in which authorised persons would gain access to the locked cabinets to gain entry to the equipment found within. It is likely that once built, the site will be visited infrequently for maintenance purposes only, in which most works can be achieved at ground level. The antennas do not need to be physically maintained once in-situ as some works such as optimizing, re-orientating or adding down-tilt to the antennas can be done remotely. In the event of the antennas attached to the mast requiring attention this will normally be achieved by siting a cherry picker with a hydraulic platform alongside the base station. Not only is it highly improbable that the antennas themselves encounter a fault and hence the use of a cherry picker is very unlikely, but should this scenario arise then the applicant will liaise with the Highways Authority to seek their authorisation. Any such works would be temporary, in which highways safety on the carriageway itself and any immediate pedestrian routes would be taken into account with appropriate measures.

Community Safety

The radio base station will be operated in accordance with the radio frequencies allocated to EE and 3 by Ofcom, in which the operators follow electromagnetic field exposure guideline. This recommendation is based on the International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines for limiting public exposure to electromagnetic fields. This means that in areas where the general public may spend time, exposure levels will be fully within guidelines which the UK Government have recommended be used and have been formal backed by the World Health Organisation. In this respect a declaration of ICNIRP compliance is provided as part of this planning submission.

Contact Details

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Signed:	<i>Vic McSherry</i>	Date:	30-03-2020
Position:	Acquisition & Planning Director	Company:	Mono Consultants Ltd

For and on behalf of MBNL, EE UK Ltd & Three UK Ltd

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