

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Berkshire House	Site Address:	Berkshire House, 252-256 Kings Road, Reading, Berkshire, RG1 4HP
National Grid Reference:	472648, 173228		
Site Ref Number:	61354	Site Type: ¹	Macro

2. Pre-Application Check List

Site Selection (for New Sites only)

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

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	No
If no explain why: Planning database consulted in lieu of mast register.		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why: n/a		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	No
Date of pre-application contact:	n/a
Name of contact:	n/a
Summary of outcome/Main issues raised: Pre-application advice was sought on the 23 rd of November 2018, and a pre-application fee was paid on the 03 rd of December 2018. No response has been received. It was however decided to proceed with an application as it is considered that the best design has been put forward in order to achieve the technical requirements of the site, and due to the technical constraints, that affect the design there is a limited scope to alter the appearance of the site to a significant degree.	

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
---	-----	-------	-------

¹ Macro or Micro

Outline of consultation carried out:

A Traffic Light Rating has been carried out to help assess the appropriate level of consultation, and using this process, the proposals have been categorised amber. In accordance with the code of best practice the following were consulted on the 23rd of November 2018:

Redlands Ward Councillors:
Councillors Absolom, Gavin and Jones

Local residents at the below addresses:
258-284 Kings Road, Reading, RG1 4HP (evens)
3-29 Montague Street, Reading, RG1 4JH (odds)
8-22 Montague Street, Reading, RG1 4JH (evens)
3-25 Victoria Street, Reading, RG1 4NQ (odds)
6-24 Victoria Street, Reading, RG1 4NQ (evens)
Flat 1-15, Charles Place, 246 Kings Road, Reading, RG1 4NZ
Flat 1-6, Edwards Place, 240 Kings Road, Reading, RG1 4NY

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

The letter sent to 25 Victoria Street, Reading, RG1 4NQ was returned and marked as “no such address”. No response was received from the above consultation.

School/College

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

A search of publicly available Department for Education and Ofsted records identified the nearest schools as follows:

Reading College, located approximately 40m away from the application site;
Red Balloon Learner Centre Reading, located approximately 95m away from the application site;
The Wigwam Day Nursery, located approximately 100m away from the application site; and
St John’s Church of England Primary School located approximately 280m away from the application site.

Outline of consultation carried out with school/college (include evidence of consultation):

Reading College was consulted by recorded delivery, and the rest of the schools/ nurseries above were consulted by tracked email, all on the 23rd of November 2018.

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

n/a – No response was received.

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?	Yes	No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	No

Details of response:

n/a – This is a full planning application and not a prior approval. However, the site does not fall within 3km of an airport, aerodrome or airfield.

Developer's Notice

Copy of Developer's Notice enclosed?		Yes	No
Date served:	n/a – the application seeks planning consent and not prior approval. The relevant notice has been issued as per the information on certificate B.		

3. Proposed Development

The proposed site:

The application site is an established telecommunications base station located on the roof of Berkshire House, 252-256 Kings Road, Reading, Berkshire, RG1 4HP (NGR: 472648, 173228). This is a 23.6m high, 6 story building located in a mixed-use area, opposite the Reading College, Kings Road campus.



Application Site

The existing equipment at this site comprises a 3m tall roof tower situated on a raised steel platform (total height of 5.3m), supporting 6No. antennas, 1No. 300mm dish and 1No. 600mm dish, and 5No. equipment cabinets located on raised steel grillage at roof level.

The required upgrade at this site is proposed to include the replacement of the existing 3m high roof tower, the 6No. antennas and 1No. 300mm dish it supports, and the existing 5No. equipment cabinets with a new 10m high roof tower supporting 12No. antenna apertures and 3No. 600mm dishes, with the existing 600mm dish to be relocated to new roof tower, 8No. equipment cabinets to be installed at roof level and 1No. meter cabinet to be installed at ground level and development ancillary thereto.

Enclose map showing the cell centre and adjoining cells if appropriate:
Network information can be provided on request.

Type of Structure (e.g. tower, mast, etc):	
Description:	
Proposed Removal: 3m Roof Tower situated on a raised steel platform (total height of 5.3m) 6No. Antennas 1No. 300mm Dish 5No. Equipment Cabinets Proposed Installation: 10m Roof Tower 12No. Antenna Apertures 3No. 600mm Dishes (existing 600mm dish will be relocated to new roof tower) 8No. Equipment Cabinets (770mm x 770mm x 2100mm) 1No. Meter Cabinet (600mm x 500mm x 1531mm)	
Overall Height:	34 Meters
Height of existing building (where applicable):	23.6 Metres
Equipment Housing:	
Length:	As above
Width:	As above
Height:	As above
Materials (as applicable):	
Tower/mast etc – type of material and external colour:	Galvanised Steel
Equipment housing – type of material and external colour:	Steel painted light grey

Reasons for choice of design, making reference to pre-application responses:
Background In designing the proposed upgraded, the applicant has sought to achieve a balance between technical requirements and minimising environmental impact as far as was practicable. It, however, must be acknowledged that technical constraints influenced the design and limited the scope to alter the appearance of the site to a significant degree. When designing a radio base station, it is necessary to incorporate certain vital elements and to work around several technical constraints. There are three main elements to a radio base station; the cabin or cabinets which contain the equipment used to generate the radio signal(s), the supporting structure that holds the antennas in the air or fixes them to a building or structure and the antennas themselves, which emit the radio signals (along with any necessary amplifier or receiver units) and communicate with mobile phones and wireless devices. Other elements necessary for the base station to function are the power source (a meter cabinet or a generator where a REC supply cannot be utilised), feeder cables that link the equipment housing to the antennas, link dishes and, depending on the nature of the site various supports, grillages and fixings, often referred to in general terms as “development ancillary to” the base station.

Site design

As noted above, the applicant gives due regard in designing all new sites and site upgrades to the desire to limit visual impact through good design. In this instance the upgrade is subject to technical and build constraints. That notwithstanding, it is submitted that the appropriate siting and design put forth mitigate any potential impact on the site and its surroundings to an acceptable level.

To achieve the required network improvement, additional antennas that transmit signals are required than is existing on site. It is thus proposed that the existing 6no. antennas be replaced with 12no. new antenna apertures at the existing site. The existing structure cannot support the new apparatus and therefore needs to be replaced with a support structure that can withstand the increased load bearing requirement. Furthermore, to achieve the technical requirement and to work within the technical constraints of the site, the height of these antenna apertures need to be raised by 5m. It is therefore proposed to utilise the roof tower put forward in the attached drawings. The proposed roof tower was chosen due to its visual permeability, which will assist in reducing the potential visual impact of the site (which will be further reduced by the height of the building on which it will stand) while still being capable of supporting the required upgraded equipment and the required height.

Dishes provide a link between base stations within the network. The size and height of the dishes is determined by the location of these surrounding neighbour cells. In this instance, a total of 4no. 600mm dishes are required. As there is an existing 600mm dish on site, and additional 3no. will be required. The size and number of dishes has been kept to the minimum required for operational efficiency and the associated impact of this addition on the surroundings would be minimal.

Radio signals are generated within radio equipment housing cabinets. New equipment housing is required at the application site to generate the signals required. In this case, 8no. equipment cabinets are required to produce the requirement network improvement and will be placed in a neat arrangement at roof level.

There is very limited scope to alter the design in order to meet the technical requirements of the site, nonetheless it is considered the proposal now put forward is appropriate to the site and its surrounds.

Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)	Yes	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 Ltd and H3G UK Ltd operates their network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision. As part of EE and H3G'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.

4. Technical Justification

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

The proposed development is required to provide improved connectivity and network enhancement to EE and H3G services in the area. Furthermore, the proposed infrastructure will be compatible with the next generation of wireless technology.

As stated in Paragraph 122 of the NPPF (2018) “*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) ...*” The NPPF takes account of the growth of the industry and technology, of the new social and economic demands for communications, and of the Government's environmental policies. This proposal, to enable EE and H3G to provide improved network services to the surrounding area, will assist in achieving these objectives.

In its 2011 Communications Market report, Ofcom summarised one of the ‘key market developments as follows: “*The explosion in mobile data volumes. The increasing use of mobile broadband services via dongles and smartphones resulted in a 67% increase in data transferred over the UK’s mobile networks in 2010...*”

The increase in smart phone usage clearly demonstrated in the Ofcom Communications Market Report of August 2015, which makes the following key points in relation to mobile phones and 4G usage:

- ‘Smartphones have overtaken laptops as the most popular device for getting online, Ofcom research has revealed, with record ownership and use transforming the way we communicate.
- Two thirds of people now own a smartphone, using it for nearly two hours every day to browse the internet, access social media, bank and shop online.
- A third (33%) of internet users see their smartphone as the most important device for going online, compared to 30% who are still sticking with their laptop.
- The rise in smartphone surfing marks a clear shift since 2014, when just 22% turned to their phone first, and 40% preferred their laptop.
- Smartphones have become the hub of our daily lives and are now in the pockets of two thirds (66%) of UK adults, up from 39% in 2012.
- The vast majority (90%) of 16-24-year olds own one; but 55-64-year olds are also joining the smartphone revolution, with ownership in this age group more than doubling since 2012, from 19% to 50%.
- The surge is being driven by the increasing take-up of 4G mobile broadband, providing faster online access. During 2014, 4G subscriptions have leapt from 2.7 million to 23.6 million by the end of 2014.
- We now spend almost twice as long online with our smartphones than on laptops and personal computers.

- On average, adult mobile users spent nearly two hours online each day using a smartphone in March 2015 (1 hour and 54 minutes), compared to just over an hour on laptops and PCs (1 hour and nine minutes).’

To meet this demand and improve the quality of service, additional base stations may be needed. In this case the replacement of the existing base station is required to continue meeting the technical requirements.

Furthermore, mobile telecommunications are vital for the UK’s economic competitiveness and in promoting social inclusion. The very high level of mobile phone use and ownership within the UK population is a very clear indication of the public’s overwhelming acceptance of the benefits of mobile communications, which requires the installation and maintenance of base stations to provide the necessary connection between the mobile phones and the UK telecommunications network.

One of numerous benefits of this, on a wider scale, is that this allows for an increase in home working, by providing the opportunity to create a “virtual office”, reducing the need to travel for work as a consequence, which is helpful in supporting the sustainable development agenda.

It is therefore very important for ‘mobile only’ households that live and work and any businesses that operate in this part of the LPA’s area, together with visitors and others who are staying in or travelling through the area, that the necessary indoor RF coverage is provided to enable them to have satisfactory mobile telephone and internet access, and thereby help achieve the Government’s objectives for inclusive development and the rollout of modern high-speed communications networks.

It is for these reasons that the National Planning Policy Framework places such emphasis on encouraging the continued rollout of high-speed digital infrastructure networks, of which the proposed upgraded development will form a key part. This position was reinforced by a statement made by the former Prime Minister David Cameron in March 2016 when he specifically addressed the vital importance of mobile connectivity for residents and local economies and highlighted that the urgent delivery of the required network improvements is a Government priority;

“Ten years ago, we were all rather guilty of leading campaigns against masts and all the rest of it. Our constituents now want internet and mobile phone coverage. We need to make sure that we change the law in all the ways necessary, that the wayleaves are granted, that the masts are built, that we increase coverage and that everyone is connected to the information superhighway. This is substantiated in the most recent budget announcement of 16th March 2016, which commits to provisions for “greater freedoms and flexibilities for the deployment of mobile infrastructure”.

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)

Site Type	Site name and address	National Grid Reference	Reason for not choosing site
n/a	n/a	n/a	n/a

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

Paragraph 43 of the National Planning Policy Framework, in which the Government’s supportive stance towards developing high quality communications infrastructure is laid out, states that “(local authorities) should aim to keep the numbers of radio and telecommunications masts and the sites for

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

The proposal is for works at an established telecommunications site and not for the development of a new site, thus the consideration of alternative sites is not appropriate. The applicant has examined its portfolio of sites in this region and determined that there are no alternatives in the area which can be upgraded to meet the specific technical requirement. The application site represents the only feasible option in this instance which allows the requirement to be met without the deployment of an additional base station in the locality.

Additional relevant information (include planning policy and material considerations):

Environmental Information:

The application site is not located in an area considered to be environmentally sensitive, or within an identified protected habitat or protected species area. The proposal will subsequently not have any potential negative impacts on any sensitive habitats or species. Furthermore, a check of the Environment Agency website has confirmed the site is within a Flood Zone 1 area, being an area with a low probability of flooding.

As far as practicable the proposed development has been designed to keep to a minimum the impact on amenity and on heritage assets in the area. The use of an existing communications site and the design of the development ensures there would be only a limited impact which would not be sufficient to harm visual or residential amenity, or heritage assets.

Heritage Statement:

The application site is located within the Eldon Square Conservation Area. This Conservation Area is within urban Reading on the east side of its medieval core and about 1 km south east of the town's modern shopping centre. With the exception of a row of grand 19th century dwellings on the north side of Kings Road (no's 163 to 189 Kings Road), the conservation area lies between London Road and Kings Road. The application site is located on the very eastern edge of this conservation area, along Kings Road.

The conservation area is in a wholly urban location and comprises a dense network of streets and roads of terraced, detached and semi-detached buildings. The most distinctive element of the street pattern is Eldon Square, which is a mid-19th century development of houses surrounding three sides of a small enclosed rectangular public park containing a lawn, trees and shrubs and a statue of the first Marquess of Reading (1860-1935) who was Viceroy of India from 1921-6. Other prominent and important landmarks in the conservation area and surrounding locality include the spires of the Wesley Methodist Church (1872) and the Church of St John the Evangelist (1872), The Oval, no. 14 St John's Road and Nos 163 to 189 Kings Road.

Views of and from Eldon Square, both churches, and the Oval are screened by vegetation and/ or intervening development and will not be impacted on by the proposed upgrade. Nos 163 to 189 Kings Road are closer to the application site, and from certain vantage points both these buildings and the application site can be seen. Nos 163 to 189 Kings Road are set well back from the road. Because of a slight bend in the road and its unusual width, these large stone houses, elevated above semi-basements, are prominent in views along Queen's Road and Kings Road. Northward views along Eldon Road and Eldon Street are enhanced by a glimpse of the stone facades of no. 169 and no. 187/189 respectively. Views of these buildings from the application site and vice versa are however partially screened by existing vegetation and intervening development. Furthermore, the application site is not located within an 'important views' corridor, as demonstrated in the below extract from the Eldon Square Conservation Area Appraisal document.



Listed Buildings Important Views Protected Trees Buildings of Townscape Merit Site Location

Extract from the Eldon Square Conservation Area Appraisal

Due to the nature of the proposed, being the upgrade of an established telecommunications base station, it will not significantly impact on the above features of the conservation area. While the applicant does not suggest that the proposed upgrade will have no impact on the area, it is considered that this minor impact will be outweighed by the significant public benefits it will provide. Furthermore, the appropriate siting and design (discussed below) of the proposed upgrade mitigate any potential impact to an acceptable level, while providing significant public benefit in the form of improved wireless communication services to the wider area.

Siting and Appearance:

The Code of Best Practice on Mobile Network Development in England emphasises that “*Existing masts, buildings or other structures should be used unless the need for a new site has been justified*”, encouraging the use of existing base stations to improve connectivity where possible, such as in this case. In this case, the technical requirement can be met through the upgrade of an existing site, as opposed to the deployment of a new site in the area in addition to this existing site. Therefore, the proposal is in line with this guidance by upgrading this already well-established telecommunications base station, where the siting of which has already been deemed appropriate, as opposed to installing a new site in the area that will increase the number of base stations in the area. Furthermore, this additional base station will likely be required within the conservation area and could potentially impact on some of the key characteristics of the conservation area. It is therefore considered, with all of the above in mind, that the siting of the proposal is wholly appropriate.

It is considered that the proposal utilises the most suitable design available to meet the technical requirement within the very specific technical constraints. As discussed in section 3, more antenna apertures that emit signals are required at this site. The current supports are not capable of supporting

these additional antennas and therefore the proposed tower is required. This tower has been designed to be visually permeable, reducing its potential visual impact when compared to a solid structure. While being taller than the existing support structure, the additional height will be mitigated by the tall building on which it stands, which will further reduce the sites potential impact when viewed from street level.

The proposed equipment cabinets will be arranged in a neat row at roof level and will not be immediately visible from street level due to their size. Only a small, single meter cabinet is required at street level.

In terms of heritage assets, the NPPF notes the following in paragraph 131 and 132:

“In determining planning applications, local planning authorities should take account of:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- the desirability of new development making a positive contribution to local character and distinctiveness.”*

“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. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting...”

The applicants recognise the importance of retaining the key features and special historical characteristics of this conservation area. Due care has been had to avoiding the loss of or harm to these features and it is submitted that the proposal respects the context of the site and avoids any material or unacceptable harm. Given that the proposal will maintain the character and appearance of the conservation area and will not compromise the contribution this conservation area makes to Reading at large, nor the local distinctiveness, it is considered to comply with the requirements of the NPPF.

It should also be noted that paragraph 134 of NPPF 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 securing its optimum viable use”*.

As above, it is considered that the proposed will not bring about substantial harm to the character of the area but will bring benefit to the public through improved connectivity and communications services.

While the applicants do not suggest that the proposed will have no impact, it is considered that when applying the balancing method advocated in the NPPF, the proposal finds itself in favour. It is important to keep the impact of telecommunications development in the area to a minimum and it is considered that the proposal achieves this. The benefits of the proposal however also need to be considered. In this case the public benefit from improved connectivity and wireless communication services. The applicant does not suggest that the proposal will have no impact on the area, but that this impact, that has been mitigated through the best design available within the technical constraints of the site, will be greatly outweighed by the public benefits the proposal will provide.

In this case, it is suggested that the application of the balancing method advocated in the NPPF, for the provision of communications and connectivity services, in the public interest, be utilised to balance the need for connectivity with the potential impact of the site. It is considered that when this balance test is applied to the proposal, where the need and significant public benefit is balanced against the appearance and level of associated visual impact of the proposed upgrade of an existing site, that the application proposal is positively in favour and is considered wholly appropriate.

This has been emphasised by the Planning Inspectorate on a number of appeal cases where, the planning inspectorate has ruled in favour of proposed developments of a similar nature, where this balance was applied. Some recent examples of where this balance was applied by the Planning Inspectorate include appeal cases referenced APP/Q3305/W/18/3206555 and APP/L1765/W/18/3197522. Extracts from these appeal decisions are included below for your convenience:

“In considering the need for the proposal, Government policy, as set out in the Framework states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. In this respect, I have found that there is a need for the proposal which therefore weighs strongly in its favour. As I have found that the level of harm relating to this second main issue would be low, that identified need would outweigh the harm in this case.”

“I conclude on this issue that despite the less than substantial harm that would be caused, the public benefits of the proposal would outweigh that harm.”

“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... 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.”

“13. Having regard to all relevant considerations, including national planning policy and the potential availability of alternative sites, my findings are that the proposal’s public benefit in maintaining and enhancing local telecommunication coverage and capacity would outweigh the limited harm arising to the character and appearance of the area.”

While each application needs to be assessed on its own merits, the above appeals (along with a growing number of others) indicate a growing trend, based on national policy and guidance, to favour important utilities infrastructure developments and upgrades in the wider public interest when the potential harm is outweighed by the important and unavoidable public benefits they provide.

Planning Policy Context:

National Planning Policy Guidance

National Planning Policy Framework (2018) (NPPF)

The new National Planning Policy Framework, which came into force in July 2018, replaces the first National Planning Policy Framework published in March 2012. The NPPF sets out the Government’s planning policies for England and how these should be applied.

Paragraph 7 of the NPPF states *“The purpose of the planning system is to contribute to the achievement of sustainable development”*, and in paragraph 10 that *“at the heart of the Framework is a presumption in favour of sustainable development”*. In order to achieve the sustainable development objective, the NPPF has identified 3 overarching objectives:

“a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations;

and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

For decision-taking this means:

“c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁷, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

Further to this, paragraph 38 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 brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area.”

The proposed development will enable the continued provision of reliable mobile communications services within the surrounding areas, bringing about substantial public benefit both socially as well as the allowing for certain businesses to expand, adapt and thrive as well as access new markets.

Local Planning Policy

Section 70 of the Town and Country Planning Act 1990 as amended requires planning applications and appeals to be determined having regard to the provisions of the Development Plan and other material considerations, and section 38 of the Planning and Compulsory Purchase Act 2004 requires applications and appeals to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

For the purposes of Section 70, the current adopted Reading local plan comprises the Reading Borough Local Development Framework Core Strategy, Reading Central Area Action Plan and associated Proposals Map, Sites and Detailed Policies Document, Reading Borough Council Proposals Map and The Central and Eastern Berkshire Minerals and Waste Plan. The relevant policies from these documents are highlighted below.

Policy CS7: Design and the Public Realm

This policy requires all development to employ a high quality of design that maintains and/or enhances the character and appearance of the area of Reading in which it is located. The Borough contains many established, attractive areas which are highly valued by residents. This policy aims to protect these areas from damage or loss due to insensitive new development.

Policy CS33: Protection and Enhancement of the Historic Environment and Section 9.1 Heritage Assets of the Sites and Detailed Policies Document

These policies aim to maintain and where possible enhance the environment and preserve the built and natural heritage assets of the area, including the boroughs various listed buildings, scheduled monuments and conservation areas. They seek to protect, and where appropriate enhance the

historic features and areas of historic importance and other elements of the historic environment, including their settings. These policies therefore require development to be considerate of its surroundings and employ a high quality of design to avoid any adverse impacts on historic assets and their settings.

As discussed in section 3: Site Design and section 5: Siting and Appearance, it is considered that the proposal utilises the most suitable design available to meet the technical requirement within the very specific technical constraints of this site and the required upgrade. It is considered that in this case, the best design has been put forward, to mitigate the potential visual and environmental impact of the required upgrade to an acceptable level. As such, the proposal will be maintaining the significant and historic features of the surrounding area and will therefore be in line with the above policies. Furthermore, the Community Strategy indicates that maintaining and enhancing the quality of the built environment and securing adequate infrastructure improvements in Reading is a principal objective. This involves not only maintaining the quality of the built environment, but also providing adequate infrastructural improvements such as the proposed, which will bring about significant public benefits in the form of improved wireless communication services.

Reading Borough Local Development Framework: Core Strategy – Section 5: Economic Development and Employment

According to the Core Strategy, Reading is at the heart of the economically buoyant Thames Valley, and is a centre for a variety of different types of industry which add considerable value to the economy, such as high-tech and ICT (Information and Communications Technology) companies. Over recent years, this increasing prosperity has led to Reading changing from a net exporter to a net importer of workers. Reading now has an opportunity to continue its economic success story in a way that contributes to the sustainable development of the Borough.

Section 5 of the Core Strategy also states that *“In line with the Community Strategy vision, Reading will be a sustainable, modern 21st Century urban centre, which serves as the capital of the Thames Valley and a nationally significant economic hub. It will be the headquarters of a number of major national and international companies”*.

In order to achieve these objectives, high quality wireless communication services provided by telecommunication base stations such as the proposed, will certainly be required. Therefore, while telecommunications are not directly mentioned in this chapter, the types of services provided by the proposal will be a small yet essential component of achieving the policies in this section of the Core Strategy.

Policy DM21: Telecommunications Development

The aim of this policy is to facilitate the continued growth of the telecommunications network whilst minimising any potential detriment to the visual amenity of the environment. This fits in with the Council's Sustainable Community Strategy, in particular in respect of providing smart infrastructure; and helps achieve Core Strategy objectives 1, in that it strengthens the role of Reading within the Thames Valley, and 2, in that it improves the quality of life for those living in the Borough.

This policy recognises that the continuing advances in mobile phone technology and increasing trends to send larger amounts of information via mobile phones, additional telecommunication infrastructure will be required to facilitate this demand.

To manage telecommunications development within the borough, this policy requires proposed telecommunications installations and upgrades to be sited and designed so as to minimise its visual impact through good design and encourages the use of existing sites and the sharing of sites to reduce the proliferation of telecommunication sites. This policy also requires proposals to be supported by an acceptable ICNIRP (International Commission for Non-Ionising Radiation Protection) declaration.

It is considered that the proposal is entirely compliant with this policy, in that the proposal is for the upgrading of an existing, shared operators' site (as opposed to the development of a new site) that utilises the best design available that meets the specific technical requirements of the upgrade (as discussed in section 3: Site Design and section 5: Siting and Appearance). As with all EE Ltd and H3G UK Ltd base stations, the proposed upgrade will be ICNIRP compliant and is accompanied by an ICNIRP (International Commission for Non-Ionising Radiation Protection) compliance declaration.

Conclusion

In summary, the application is in respect of electronic communications apparatus necessary to maintain and improve existing public infrastructure networks.

This statement has demonstrated that the proposal is in accordance with national policy set out in the NPPF. In particular, it is a form of development that is specifically encouraged as a matter of principle and in its detail complies with the policy objective of minimising potential environmental impact, being appropriately designed and located.

In conclusion, the application merits support and there are no material considerations that indicate otherwise.

Name (Agent):	Wade Banks, Waldon Telecom	Telephone:	01932 411 011
Operator:	EE Ltd and H3G UK Ltd	Fax no:	01932 411 012
Address:	C/o Agent	Email Address:	wade.banks@waldontelecom.com
Signed:	Wade Banks	Date:	03 January 2019
Position:	Town Planner	Company (Agent): (on behalf of EE Ltd & H3G Ltd)	Waldon Telecom (Agent) Phoenix House Pyrford Road West Byfleet Surrey KT14 6RA