

Our ref. 25668/VP

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Date: 11 June 2019

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

Submitted via the Planning Portal

Dear Sir or Madam,

PLANNING APPLICATION FOR THE PROPOSED UPGRADE OF AN EXISTING TELECOMMUNICATIONS SITE AT TERRANOVA HOUSE, BENNET ROAD, READING, RG2 0RJ (SITE REF 25668) NGR E: 471085, N: 169957.

We are planning consultants retained by MBNL to submit planning applications on their behalf. MBNL is a joint venture between EE Limited and H3G UK Limited.

This proposal is for the upgrade of the existing EE Limited and H3G UK Limited site.

EE Limited and H3G UK Limited have been licensed to provide a Cellular Network based upon the Global System for Mobile (GSM) standard and Universal Mobile Telecommunications System (UMTS) within the United Kingdom.

The development consists of:

“The removal and replacement of the existing 17.5 metre high monopole and 3No. antennas with an upgraded 20 metre high lattice tower and 6No. upgraded antennas, the relocation of 1No. dish to be located on the new tower, the installation of 8No. equipment cabinets located at ground level in the compound, and ancillary development thereto.”

Enclosed is the following:

- Drawings no. 1107576 – 002, 100, 150, 215, 265 – D
- Application forms
- Planning Statement (including design and access statement)
- ICNIRP certificate
- 5G and Future Technology document
- Connected Growth Manual – Digital Infrastructure document

The requisite planning fee of £462 will be paid via the Planning Portal service.

We trust you will find the enclosed information sufficient to register and validate the application. If however you require any further information, please contact Victoria Parsons on 0161 956 4123 or victoria.parsons@avisonyoung.com.

Yours sincerely,

A handwritten signature in black ink that reads "V. Parsons". The signature is written in a cursive, slightly slanted style.

Victoria Parsons
Planner, Telecoms
Avison Young
For and on behalf of MBNL (EE Limited and H3G UK Limited)

1.0. HISTORY & BACKGROUND

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

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

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

This application upgrades the existing equipment.

1.1. DESIGN

1.1.1. The Proposal

The proposal is for the upgrade of the existing site located at Terranova House, Bennet Road, Reading, RG2 0RJ.

The proposed scheme comprises the removal and replacement of the existing 17.5 metre high monopole and 3No. antennas with an upgraded 20 metre high lattice tower and 6No. upgraded antennas, the relocation of 1No. dish to be located on the new tower, the installation of 8No. equipment cabinets located at ground level in the compound, and ancillary development thereto.

The width of the replacement tower will increase the width of the apparatus by more than a third, and therefore a full planning application is required.

1.1.2. Design Considerations

Formal pre-application advice

Formal pre-application advice was sought and received on a scheme to replace the existing 17.5 metre high Phase 5 monopole with a 25 metre high lattice tower and 6No. antennas. The feedback concluded that the proposal is acceptable in principal providing adequate justification was provided to demonstrate all requirements contained within the Local Plan and the NPPF. The following information and justification was requested:

- *Justification for the use of a replacement 25 metre high lattice mast with 6 antennas in place of an existing 17.5 metre monopole mast;*

The existing 17.5 metre high Phase 5 monopole is unable to support the increased size of the antennas. It is necessary to increase the height of the apparatus slightly as the upgraded antennas are larger and cannot sit at a lower height than in the Phase 5 monopole. After the formal feedback was received, the designers identified that a 20 metre high lattice tower would be able to hold the upgraded antennas at the required height, and therefore the height of the proposed tower has been reduced. The 6No. antennas are required to provide 5G coverage to the area.

- *Confirmation of whether alternative sites have been discounted;*

As the proposal is for the upgrade of an existing site, no new sites have been investigated. The operators work in line with planning policy in that they will always look to upgrade existing sites before proposing a new installation in an area. On this occasion, it is possible to provide the required 5G coverage by upgrading an existing site, and therefore no new sites were identified or discounted.

Other existing sites in the area were also investigated but the site at Terranova House was the only one that was able to be upgraded. The other three sites within the search area are Streetworks sites which are not capable of being redeveloped.

- *Outcome of consultations with organisations with an interest in the proposal;*

Formal pre-application advice was sought and received from the Local Planning Authority. Further consultation was also carried out with Councillors Emmett McKenna, Kelly Edwards and Rachel Eden. No responses were received from the Councillors; if any are received after the application is submitted we will forward them on to the Local Planning Authority.

- *A statement that self-certifies that the cumulative exposure, when operational will not exceed International Commission guidelines on non-ionising radiation protection;*

An ICNIRP certificate is submitted as part of this application to confirm that the proposal does not exceed the guidelines.

- *Confirmation that there will be no harmful loss of parking, turning storage space, and that the successful operation of adjoining industrial units are not compromised;*

The scheme proposes a fairly minor extension to a compound located in a very large yard. The compound is located away from the existing parking, turning and storage areas and therefore it is not considered that the proposal will compromise the successful operation of adjoining industrial units.

The proposed upgrade utilises an existing site where possible. The operator has identified a requirement in this area to upgrade the equipment in order to introduce 5G coverage and improve capacity.

The site is located on the corner of the A33 and Acre Road, in an industrial area on the southern outskirts of Reading. It is a considerable distance from the nearest residential properties.

It is not considered that the proposed works will have a detrimental impact on the surrounding area as the proposal is for the upgrade of an existing established site. There are similar vertical elements in the nearby vicinity, as the site is viewed in the context of the surrounding industrial area.

It is not considered that the proposal will have a detrimental impact on the area, and permission should not be withheld.

1.1.3. Planning Policy Considerations

Section 54A of the Town and Country Planning Act 1990 (as amended)(now section 38 (6) of the Planning and Compulsory Purchase Act 2004) states that Local Planning Authorities should determine proposals in accordance with development plan policies,

unless material considerations indicate otherwise. Material considerations may include, inter alia, central government guidance, High Court and Inspector's decisions etc.

1.1.4. Local Policy

Reading Borough Local Plan – Pre-Submission Draft

Dated November 2017 – un-adopted (holds limited weight)

Policy OU3: Telecommunications Development

- It is not considered that the proposal will have an adverse impact on the visual amenity of the surrounding area as the site is viewed in the context of the surrounding industrial estate. The lattice style design has been chosen to allow views through the site.
- Due to the nature and topography of the site, the required height and the style of the tower (which will allow for the installation of the larger upgraded antennas), it was not possible to utilise the existing monopole and camouflage options are limited. However, there are existing trees which will aid in ameliorating the presence of the site when viewed from the nearby A33.
- The proposal is for the upgrade of an existing telecommunications site that is already an established feature in the area, and therefore alternative sites have not been sought. Upgrading an existing site is always the preferable solution for the operators before a new site is sought, and this stance is in line with local and national policy.

It is noted that Reading Borough Council support the swap out of lamp columns and this seems to be the preferable approach for the installation of telecommunications apparatus in the borough. However, due to the nature of the upgrade and the size of the required antennas, it is not possible to utilise a lamp column swap out in this instance.

Reading Borough Core Strategy

Adopted January 2008, alterations adopted 27th January 2015

No policies directly related to the installation of telecommunications.

1.1.5. National Planning Policy Framework

Adopted February 2019

Section 6 – Building a strong, competitive economy

Section 10 – Supporting high quality communications

Section 12 – Achieving well-designed places

The following paragraphs need to be considered in relation to this application:

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

Paragraph 112 – “Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections.”

In relation to these paragraphs, the Government's Industrial Strategy sets out a vision to drive productivity improvements across the UK, and sets out a delivery programme to make the UK a leader in "artificial intelligence and big data". The improvement of telecommunications capacity is imperative to allow for areas to be connected, and is essential for economic growth. The upgrade of the existing site will provide 5G coverage to the area.

Paragraph 113 – "Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged."

In relation to this paragraph, it is possible to upgrade an existing site.

Paragraph 114 – "Local planning authorities should not impose a ban on new electronic communications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of electronic communications development, or insist on minimum distances between new electronic communications development and existing development. They should ensure that:

- a) They have evidence to demonstrate that electronic communications infrastructure is not expected to cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and
- b) They have considered the possibility of the construction of new buildings or other structure interfering with broadcast and electronic communications services."

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

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

In relation to this paragraph, the site is not located near a school or college, or within a statutory safeguarding zone surrounding an aerodrome, technical site or military explosives storage area. Additional consultation has been carried out with the ward councillors; no responses have been received to date. An ICNIRP certificate will be provided with the planning application to confirm that the proposal will not exceed International Commission guidelines, and can be provided as part of the pre-application enquiry on request. As the proposal is for the upgrade of an existing site, no alternative sites have been sought.

Paragraph 124 – “Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”

In relation to this paragraph, this type of lattice mast has been selected as it has the structural capacity to mount the required number of antennas and will allow two operators to share the mast (EE Limited and H3G UK Limited). The lattice has been selected rather than a monopole as views through the site are maintained and it presents a less bulky structure. This type of installation is in keeping with the industrial nature of the area.

1.1.6. Site Need and Identification

The proposal is to upgrade an existing site; therefore no alternative sites were considered as the proposal has very little visual impact on the area.

In addition to the above, the site will form part of an improved upgraded network for the operator which will allow faster downloading and the reduction in call drop outs.

Coverage - The licence granted to H3G & EE demands that strict coverage qualities are met. It is essential that the benefits of mobile telephones are available for all the population. The changing customer use of mobile phones also demands that networks and coverage is available at home, in the workplace, while shopping, enjoying leisure activities or while on the move. This proposal will introduce 5G coverage to the area.

Quality - In order to ensure coverage within buildings such as homes, shops, offices etc. the radio signal has to be of sufficient strength to penetrate walls. In urban and suburban areas a dense network of base stations is therefore required, some less than 1 km apart.

Capacity - As the use of and demand for mobile phones has increased the number of sites required to provide Network capacity has increased. Each cell or base station can only handle a finite number of calls so in areas of high use additional cells are required to meet demands on the network and thus avoid existing cells going into congestion.

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

The planning tool identifies deficiencies in the network and predicts the location from which the optimum coverage will be provided. This area is referred to as the search area or cell centre.

It is for these reasons that it is important to achieve a service of quality for mobile users. The main complaints received by mobile telephone operators about their service relate to the problems associated with dropped calls and no service. As more and more people are using tablets and smart phones there is a need to ensure that existing sites can meet this demand. This is one such site as due to the location of the site close to several sports facilities there is a high level of traffic to the site.

1.1.7. Health and Safety

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

2. ACCESS

Access to the site will remain unchanged, as will the on-going traffic visiting the site. We do not envisage additional maintenance visits incurring, and being new equipment, the likelihood of requiring visits for repair is remote.

3. CONCLUSION

This is an upgrade of an existing site; it is not considered that the proposal will have a detrimental impact on the surrounding area. The site is located a considerable distance from the nearest residential properties and will provide 5G coverage to the area.

We hope the above information is sufficient for you to consider this application favourably.