

PLANNING APPLICATION AND LISTED BUILDING CONSENT

SUPPORTING STATEMENT

**BT TELEPHONE EXCHANGE, 41 MINSTER STREET,
READING**

ON BEHALF OF H3G & EE C/O ARQIVA LTD

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

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PLANNING | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

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1. EXECUTIVE SUMMARY

The Proposed Development

- 1.1 As part of H3G and EE continued network improvement programme, there is a specific requirement for a mobile infrastructure upgrade at this location to provide new 4G (fast data) service, plus enhanced, integrated 3G to improve overall capacity. The site, following the proposed upgrade, will be 'future proof' meaning that it will also be capable of accommodating new, more advanced technologies when they come on stream.

The Benefits of Electronic Communications

- 1.2 The proposed development and its role in the operator's network provides the varied and now well-established benefits of high speed wireless communications, including access to a range of services, increasing economic opportunity and improving the social wellbeing of the local population.
- 1.3 By providing these the proposal should assist in achieving the goals of sustainable development. This is in accordance with the statutory duty placed upon local planning authorities and accentuated by the presumption in favour of sustainable development within the National Planning Policy Framework (NPPF).

Technical and Operational Constraints

- 1.4 The development proposed is framed in the context of the operator's existing network. This imposes particular locational and siting requirements. The proposal represents best practice in terms of the shared use of an existing electronic communications site, while minimising visual impact.

Pre-Application Consultation

- 1.5 Pre-application consultation in relation to the proposal has been undertaken with the local community whereby letters were sent to the Local Planning Authority, local elected Councillors, residents, and education establishments. No response has been received to date. As the site is within the curtilage of a Grade II Listed Structure, we confirm that we have also consulted Historic England as advised by the NPPF and the Code of Best Practice, again, at the time of writing, no response to this letter has been received.

Compliance with Planning Policy and other Material Planning Considerations

- 1.6 Planning policy at national level is set out in the NPPF. Section 5 of the NPPF views high quality communications infrastructure and systems, such as that proposed in this application, as essential to meeting sustainable development objectives. National policy also recognises that communications networks and the services provided by them play a vital role enhancing the provision of local community services and facilities.
- 1.7 Other parts of the NPPF, for example sections 9 and 12, seek to protect the natural and historic built environment. Similar objectives are outlined in relevant Development Plan policies.
- 1.8 These policy considerations have been properly assessed in bringing forward this proposal and an appropriate balance has been struck between the objectives of developing new high quality communications infrastructure and protecting the environment. All reasonable steps have been taken to minimise perceived environmental impact whilst having regard to the operator's technical and operational requirements. As demonstrated in this statement there is no preferable alternative to the proposal.
- 1.9 The design, layout and scale of the proposal have been guided by the special technical and operational requirements that are associated with electronic communications development. The rooftop proposal also reflects the careful consideration given to siting and design in order to ameliorate potential visual impact.

ICNIRP Compliance

- 1.10 The proposed antennas comply with all relevant health and safety requirements, in accordance with ICNIRP guidelines. A certificate of compliance has been provided with this application.

Servicing and Maintenance

- 1.11 The site will require periodic access for maintenance and servicing visits. This will be restricted to authorised personnel only, and therefore the proposal does not give rise to any issues associated with public access.

1.12 In conclusion, the proposal has been designed and sited as sensitively as practicable and strikes an acceptable balance between technical requirements and environmental considerations. As such, the proposal is supported by both local and national planning policy, and as such it is considered that the application should be looked upon favourably.

2. INTRODUCTION

- 2.1 This statement is submitted on behalf of H3G and EE in support of the application for planning permission to install electronic communications apparatus at Reading Central ATE, 41 Minster Street, Reading, RG1 2AF.
- 2.2 This site is owned by BT and the mobile radio equipment is owned and managed by Arqiva. Arqiva is a British company which builds, owns, hosts and operates shared radio telecommunications infrastructure. It owns and operates the UK's TV and radio broadcasting transmitter network, and it hosts a large number of other radio transmission services on its sites. To improve its local service H3G and EE have approached Arqiva to install improved mobile telecommunications equipment at the Telephone Exchange.
- 2.3 The development proposed is shown in detail in the drawings submitted and its principal elements are as follows: -
- Repositioning of existing 1 No. antenna onto new 2.5m high pole at rooftop level;
 - Upgrading of existing rooftop base station through the provision of additional 3 No. antennas on steelworks;
 - Upgrading of existing rooftop cabinet;
 - Provision of 3 No. RRU and 6 No. BOB unit to be fixed to steelworks at rooftop level; and
 - The installation of cabling and associated development thereto.
- 2.4 In this statement we go on to highlight the benefits of the development proposed, to explain the particular need in this case and to demonstrate compliance with planning policy. We also provide information on health and safety and related issues by way of further reassurance.

3. SUSTAINABLE DEVELOPMENT

3.1 Mobile communications are a public service that are of great economic and social benefit. A further major benefit is the contribution that such systems make to the attainment of often elusive objectives relating to sustainable development. In view of the statutory duty placed upon local planning authorities under Section 39 of the Planning and Compulsory Purchase Act 2004 and accentuated by the presumption in favour of sustainable development now within the National Planning Policy Framework (NPPF), this contribution merits highlighting.

3.2 Having regard to the government's three key dimensions for sustainable development within the NPPF, mobile communications will assist in a number of ways. With reference to, and in addition to the examples of the many benefits of mobile communications, sustainable objectives will be supported in the following ways:

- **An economic role** - modern communications in all their different and emerging forms, including mobile communications, help maintain high and stable levels of economic growth and employment. Hence, the UK Government's continued commitment to the growth and development of modern electronic communications.
- **A social role** - modern communications, including mobile communications, aid social progress, which recognises the needs of everyone. This manifests itself in a number of ways as illustrated by the following examples:
 - Extending economic opportunity through faster and more flexible means of communication capable of handling large volumes of data. This is particularly important to those who live in remote areas, where economic opportunities might be more limited particularly amongst the more socially disadvantaged, with poorer access to transport.
 - Enabling flexible forms of working that provide opportunities to working parents or carers and help them achieve a better work life balance with both family and community benefits.
 - Providing access to goods and services.

- By providing means of communication that improve convenience and enhance personal safety and security. This is especially important to vulnerable groups who may otherwise feel unable to participate in certain activities.

- **An environmental role** - modern communications, including mobile communications, provide effective protection of the environment by helping reduce the need to travel by enabling modern working practices such as greater home working. Such practices reduce the need for travel and can alleviate the pressure for new commercial development such as offices, through more efficient and flexible use of existing accommodation. For the same reasons, modern communications, including mobile communications, help ensure the prudent use of natural resources.

3.3 However, to make this important contribution to sustainable development objectives and to provide the range of services demanded by the public, mobile networks do need to be supported by an infrastructure of base stations, as explained above. Without a network of base station in place, mobile coverage will simply not be provided. This is no different than railway services, for example, being reliant on the associated infrastructure of lines and stations. More specific information on the operational requirement relevant to this application is explained in the next section of this statement.

3.4 Public demands and service expectations of mobile communications networks have also grown immeasurably as the handset manufacturers and software engineers produce an increasing array of innovative devices and services. Businesses place growing reliance on mobile communications as a means of improving responsiveness and productivity. Mobile services and applications now also offer the means to advertise in a very targeted way.

3.5 The young population in particular expects to be connected at all times as mobile devices are their main or only means of accessing popular social network sites. Connecting to the internet via a smartphone or a mobile broadband enabled tablet is an increasingly important to allow people to access public sector services, to do research for a school project, or to apply for a job.

- 3.6 The ability to keep in contact or call emergency services immediately is also something that many rely on. This has implications for both the extent and quality of coverage. Long gone are the days when people were pleased if they could place a call standing in their garden. Most importantly, also long gone are the days when car crash victims in the middle of the night were reliant on the help from a passing car or finding a nearby farmhouse from where to call the emergency services.
- 3.7 The importance of mobile communications technology in the UK is one of the topic areas covered by Ofcom's Communications Market Review reports. In its May 2013 report, 'The availability of communications services in the UK', Ofcom, which is the independent regulator for the UK's communications industries, summarised the importance of access to communications in the following terms:

'3.2 Communications services provide people with access to political, educational and cultural activities and resources. The availability of such services matters because a lack of availability results in reduced (or non-existent) access to such resources. Reduced access can be compounded, typically in rural and remote areas, by a lack of other public services, such as libraries or public transport.'

3.3 Access to communications services provides benefits to both individuals (for example, by providing the means to stay in touch with friends and family), businesses (for instance as a means to engage with suppliers and customers) and society as a whole (for example, by providing educational resources that result in a more skilled and informed population). The development of digital communications services and the movement into the digital age have made communications services an increasingly integral part of our daily lives. The UK Government estimated "the typical British consumer spends nearly half of their waking hours engaged in one form or another with the products and services of the communications sector." Digital communications services are used increasingly to participate in civil society, to learn and develop, to keep in touch, to share information and for entertainment, among other activities. The increasing integration of digital communications

services within daily life has resulted in both an increase in the scale and significance of their associated benefits and the implication that increasingly fewer adequate substitutes are available to those who do not access them.'

3.8 Figure 5.1 of Ofcom's Communications Market Report 2013 includes a number of statistics for the period 2007-2012, which highlight the continued and increasing importance of access to mobile communications for residents and businesses in the UK:

- Active mobile subscriptions increased to 82.7m compared to a continuing decrease in the number of fixed telephone lines to 33.1m. The number of fixed lines has fallen from a figure of 34.7m in 2007.
- 2010 marked a watershed moment when mobile voice call minutes exceeded fixed-line voice minutes for the first time (125 billion compared to 123 billion). This trend has continued and widened, and in 2012 the figures were 122 billion and 103 billion minutes respectively.

3.9 The fall in the number of mobile voice minutes recorded between 2010-2012 is likely to be caused in part by the continued growth in smartphone use, which provides the opportunity for individuals and businesses to access mobile broadband and thereby communicate in different ways to the traditional telephone call, e.g. by email and instant messaging services, or through internet based social media websites.

3.10 Smartphone ownership continues to grow rapidly, and Ofcom records that more than half (51%) of UK adults were using smartphones in 2012. This compares to 27% at the end of the same the period in 2011. Hand-in-hand with the increasing use of smartphones to access services such as mobile broadband is the growing consumption of mobile data sent over the UK's mobile communications networks. In its previous 2011 report, Ofcom identified the explosion in mobile data volumes as a key market trend, a position reflected in the 67% increase in data transferred over the UK's mobile networks in 2010.

- 3.11 More recently, the government's 'Mobile connectivity in England Technical Consultation'¹ document issued in May 2013 records that data traffic over the existing second-generation (2G) and third-generation (3G) networks had more than doubled in 2012 alone. This trend is likely to continue, particularly when the new data-hungry fourth-generation (4G) services become more established on the back of the deployment of 4G communications networks.
- 3.12 The growth in smartphone use, in particular, is creating new opportunities for the UK's increasingly important creative services industry. For example, Ofcom has previously reported that mobile advertising revenues increased ten-fold between 2008 and 2012, helping to support existing jobs and no doubt creating new employment opportunities along the way.
- 3.13 The Mobile Network Operators have now started to provide 4G high-speed mobile broadband services following the government's allocation of 4G spectrum licences in 2013. The government is keen for the 4G coverage to be widely available and the licences granted to the operators impose obligations on them to provide certain levels of coverage. For example, one of the operators is required to provide mobile broadband services to 98% of the population living in villages, towns and cities across the UK. The delivery of 4G services requires a combination of new base station infrastructure and upgrades to existing base station sites developed or adapted for the earlier 1G, 2G and 3G networks.
- 3.14 The importance of 4G networks is highlighted in the government's 'Mobile connectivity in England Technical Consultation' document, which refers to a Capital Economics study that estimates that £5 billion (in 2009 prices) invested in the 4G supply chain will create 125,000 jobs for the UK economy. The swift rollout of 4G networks is also estimated to lead to a rise in Gross Domestic Product of approximately 0.5% per annum.
- 3.15 In addition, the operators are continuing to invest in 2G and 3G networks to provide additional coverage and capacity to meet the demands being placed upon them. For example, an important strand of the continued investment in 2G coverage is being provided through the Mobile Infrastructure Project, a £150m

¹ Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/193950/Mobile_connectivity_in_England_-_Technical_consultation.pdf

government funded project to provide coverage to 'notspots', which are typically in remote rural locations where mobile coverage is presently non-existent.

- 3.16 Also worthy of mention, are Ofcom's findings in relation to the importance of mobile services to certain sections of the population. In the August 2013 Communications Market Report, Ofcom's research suggests that while the proportion of mobile-only households in the UK averages 15%, this is significantly higher amongst those aged 16-34 (at just under 30%) and amongst the D and E socio-economic groups (26%).
- 3.17 These findings are particularly relevant for communities with a high proportion of students, who are most likely to be in the 16-34 age groups, and those in more economically deprived and disadvantaged areas where higher concentrations of the D and E socio-economic groups may exist. The need to ensure adequate coverage and capacity for 2G, 3G and 4G networks in such areas is particularly important.
- 3.18 In summary, the public benefits of mobile communications are, therefore, many and varied. Digital communications are an integral part of modern life and improved connectivity is increasingly important to the economy, to the way public services are accessed and provided, for entertainment, and for keeping in touch with friends and family. It is for these reasons that the National Planning Policy Framework places such emphasis on encouraging the continued rollout and improvement of digital infrastructure networks of which the application proposal is a key part.

4. THE OPERATOR'S REQUIREMENT

- 4.1 H3G has entered into an agreement with EE pursuant to which the two companies plan to jointly operate and manage a single network grid across the UK.
- 4.2 This agreement allows both organisations to:
- Pool their basic network infrastructure while running two, independent, nationwide networks;
 - Maximise opportunities to consolidate the number of base stations;
 - Significantly reduce the environmental impact of network development; and
 - Aligns with longstanding national planning policy to minimise the proliferation of new communications infrastructure through sharing
- 4.3 Section 6 of the Code of Best Practice on Mobile Network Development, published in July 2016, explains how mobile networks operate. In the annual network rollout information supplied, the operators will have explained its network requirements and the anticipated use of existing sites, including those owned by radio site management companies like Arqiva.
- 4.4 As part of H3G and EE continued network improvement programme, there is a specific requirement for a mobile infrastructure upgrade at this location to provide new 4G (fast data) service, plus enhanced, integrated 3G to improve overall capacity. The site, following the proposed upgrade, will be 'future proof' meaning that it will also be capable of accommodating new, more advanced technologies when they come on stream.

5. COMPLIANCE WITH PLANNING POLICY

5.1 The relevant planning policy and best practice framework is found principally within:

- The local policy framework set out in the adopted Development Plan;
- National Planning Policy Framework (NPPF); and
- The Code of Best Practice on Mobile Network Development in England.

5.2 From these documents can be discerned the general policy background that exists for electronic communications development, site specific policies and the key considerations relevant to the siting and design of appropriate electronic communications development. As planning authority, you will be familiar with this framework and so in the interests of brevity, we do not rehearse it back to you in detail, but address instead the principal themes to demonstrate that the application accords with them.

The General National Policy Background

5.3 The general policy background found now within the NPPF can be summarised as follows:

- Government policy is to support high quality communications infrastructure and systems
- Government policy is to keep the inevitable environmental impact associated with electronic communications development to the minimum
- The key way to minimise environmental impact is to avoid the unnecessary proliferation of new radio masts and sites
- The starting point for planning new networks or the expansion of existing networks is, therefore, to use existing electronic communications sites owned by other operators or radio site management companies, such as Arqiva
- The emphasis on minimising environmental impact is greater according to the sensitivity of the site. The emphasis on exploring and utilising site sharing opportunities is consequently higher in these circumstances

- 5.4 The NPPF as a whole is aimed at encouraging a more positive approach to town planning. While the NPPF builds environmental protection into the definition of sustainable development, there is also a very clear emphasis that local planning authorities should be looking for ways to help development come forward and not reject applications simply on environmental grounds. The NPPF recognises that this is especially relevant where a development might have other significantly important benefits such as being essential to meet, for example, sustainable economic growth or a national need which can include digital infrastructure networks.
- 5.5 The proposed development and its role in the operator's network is clearly an important material planning consideration as it is precisely the type of digital infrastructure that the NPPF is seeking to support.
- 5.6 Hence, it is important to reflect on some key points within the NPPF which are relevant to the very important development at the application site and the general planning principles that should apply when determining the merits of the application:

- **Paragraph 14** *advises that authorities should:*
 - positively seek opportunities to meet the development needs of their area [as part of plan making];
 - meet objectively assessed needs unless the adverse effects would *'...significantly and demonstrably outweigh the benefits...'* ;
- **Paragraph 17** *advises that planning should* "proactively drive and support sustainable development to deliver the homes, businesses and industrial units, infrastructure and thriving local places that the country needs" *[my emphasis]*;
- **Paragraph 19** *states that* '...planning should operate to encourage and not act as an impediment to sustainable growth ... significant weight should be placed on the need to support economic growth through the planning system';
- **Paragraph 187**, on "decision-taking" *states that authorities should* '...look for solutions rather than problems, and decision-takers at every level

should seek to approve applications for sustainable development where possible’.

- **Paragraph 14** of the NPPF further states that the presumption in favour of sustainable development lies at the heart of the planning system and, in respect of decision-taking, this means that *development proposals that accord with the provisions of the Development Plan should be approved without delay. In respect of this guidance, the following sections of this statement demonstrate that the proposed development accords fully will all relevant Development Plan policies and, therefore, permission should be granted for the development.*

Supporting Advanced Communications Infrastructure of the NPPF

- 5.7 The proposal is supported by, and accords with, the guidance in Section 5 of the NPPF, which provides further guidance on the Government’s objective of supporting the provision high quality communications networks.
- 5.8 The NPPF clearly acknowledges the benefits of modern electronic communications and seeks to encourage such development as being essential due to their role in supporting a modern economy, contributing to sustainable objectives, and enhancing local community access to a range of goods and services. Local planning authorities are advised to respond positively to proposals for electronic communications development and this has to include an understanding of the associated special problems and technical needs of developing communications networks.

Conserving and Enhancing the Historic Environment

- 5.9 Section 12 of the NPPF relates to the historic environment. This is relevant to the development proposed since the site is within the curtilage of the Grade II Listed Telephone Exchange. Paragraph 134 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.

Local Policy Considerations

- 5.10 At a local level, Policy DM21 of the Reading Borough Council Sites and Detailed Policy Document [SDPD] (adopted 2012 and revised January 2015) provides a permissive policy for telecommunications infrastructure. The amplification to the policy, at para 10.2.2 of the SDPD, states *“This policy aims to facilitate the continued growth of the telecommunications network whilst minimising any potential detriment to the visual amenity of the environment”*. Paragraph 10.2.4 goes on to state *“Given continuing advances in third and fourth-generation 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. This will most notably be in the form of new telecommunications ‘base stations’ or antennae”*.
- 5.11 The proposed development is therefore considered to strike the best balance between meeting the specific network requirements for the operator(s) and minimising environmental impact.

A Consultative Approach

- 5.12 The National Planning Policy Framework (NPPF) and the Code of Best Practice on Mobile Network Development require a consultative approach to network development and a process to reflect the sensitivities of any given site. In this case, the proposal received Red specify score when assessed against the traffic light rating model (see Appendix B of the Code of Best Practice) and pre-application consultation was undertaken with you on 5 December 2017. In our consultation letter we sought to agree with you the appropriate traffic light rating and associated consultation requirements, and obtain your comments on the siting and design of the development. As the site was red consultation was also undertaken with local residents, ward councillors, local schools and surgeries. The site is within the curtilage of a Grade II Listed Structure, we confirm that we have also consulted Historic England as advised by the NPPF and the Code of Best Practice. At the time of writing, no response to these letter has been received.
- 5.13 In addition, we confirm that all due notifications under the Electronic Communications Code (Conditions and Restrictions) Regulations 2003 (the Code Regulations) have been made.

Site Selection Considerations

- 5.14 In establishing potential options for meeting the requirement explained above, the operator has committed to follow the site selection process found in the Code of Best Practice. Therefore, as a matter of course it examines the main and most comprehensive databases including the joint operators' database, the Ofcom database, and information on sites owned or controlled by radio site management companies like Arqiva.
- 5.15 This exercise established that the only electronic communications site suitable and available for use is the subject site. In any event, the NPPF advises that it is only where a new mast or base station is proposed that a local authority may reasonably expect to see evidence that the operator has explored the possibility of erecting antennas on an existing mast, building or other structure. As the proposal does not entail a new mast or a new site for electronic communications, it therefore conforms to the advice on sharing existing structures and so the issue of alternative sites is not a relevant factor in this case.
- 5.16 The selection of the subject site therefore follows the due process and also complies with the general guidance found in paragraph 43 of the NPPF.

6. DESIGN AND ACCESS CONSIDERATIONS

- 6.1 The development proposed is exempt from the requirement to provide a design and access statement under Article 9 of The Town and Country Planning (Development Management Procedure) (England) Order 2015. However to assist your consideration of the detail, this section provides a description of the process adopted in the design of the proposals and explains the access considerations. Due regard has been given to the factors listed in Appendix A of the Code of Best Practice.

Physical Context

- 6.2 The application site occupies a rooftop position of the telephone exchange building at Minster Street, Reading. The telephone exchange is a three-storey Grade II listed building that fronts onto the southern side of Minster Street. The building is finished in red brick with stone dressing in an attenuated Georgina style. The building was extended to the rear with a significant five-storey extension erected circa 1960. The application site relates to the rooftop of the later extension to the listed building. The site is located within the Reading central and is enclosed by commercial buildings of similar size, these include Primark, John Lewis and The Oracle Shopping Centre.

- 6.3 The application site adjoins the St Mary's Butts Castle Street Conservation Area.

Amount, Design, Layout and Scale of the Development

- 6.4 The scale, layout and design of the development has been guided by the special technical and operational factors affecting the need to provide coverage to the local area, having regard to the need to minimise visual impact, already referred to above. With regard to the factors listed in the first paragraph of page 26 of the Code, we make the following observations:

- **Kept in proportion to the building or structure**

The scale of the apparatus is not large and when installed should look proportionate to the structure as a whole. The antennas are similar to the existing electronic communications apparatus installed on the building. They will therefore be seen in the context of this apparatus and will not appear as incongruous or jarring additions to the building or look out of place within the heritage area.

- **Respect architectural style**

Within the severe technical constraints the apparatus shall be installed in a manner that respects architectural style. Architecture and its style are about function as well as pure design. The telephone exchange was designed to provide local connections to the electronic communications networks. Mobile phone base stations are a more modern wireless form of telephone exchange, but still require many of the operational attributes present. The development proposed therefore fully reflects the function of the exchange and the apparatus proposed can be viewed as an evolutionary requirement. In similar fashion, for example, a railway station, i.e. development required for another form of communications, which now may form part of our built heritage still has to evolve in accordance with new technology and safety requirements. In turn these translate into an array of structures that were often never envisaged when first built.

- **Have minimal impact above the roofline commensurate with technical constraints**

The apparatus that projects above the roofline has been kept to the minimum having regard to the technical parameters and design considerations explained above.

- **Not be detrimental to views and general skyline**

All the proposed telecommunications equipment would be located on the rooftop of the later extension to the listed building. The application proposal would not be visible from Minster Street where views of the listed building are taken from. Consequently, it is considered that the proposal would not detract from its external or internal character or appearance or damage its historic or structural integrity. A combination of design, topography and natural and manmade features should help keep any perceived changes to views and the skyline to within acceptable limits.

- **Avoid creating clutter**

The apparatus should not look unduly cluttered and insofar as it might be visible it will be viewed as operational electronic communications

equipment compatible and now expected on a building designed and constructed exclusively for electronic communications purposes.

- **Use clean lines and maintain symmetry**

The apparatus has clean lines and has been sited to maintain symmetry with both the building and its different elements.

- **Antenna Array**

The numbers of antennas and dishes and their size has been kept to the minimum necessary to provide coverage and to link this site back into the operator's network. The design of these features is very much driven by operational and technical factors.

Access Considerations

- 6.5 Access to the site will be provided from Minster Street.
- 6.6 Once constructed, the development will be unmanned requiring only periodic visits, typically once every two to three months for routine maintenance and servicing.
- 6.7 In accordance with all relevant health and safety legislation and guidelines, access to the site will be restricted to authorised personnel and the routine maintenance and servicing of the apparatus will only be carried out by properly trained and qualified staff. Electronic communications base stations are specifically designed to prevent unauthorised access by members of the public and, therefore, there is no requirement to incorporate inclusive access arrangements into the proposed layout and design of the development.

Landscaping

- 6.8 The proposal relates to the installation of electronic communications apparatus on the roof of a building that is five-storey in height. A scheme of landscaping is, therefore, considered unnecessary and impractical in this case.
- 6.9 In summary, the sensitive approach to siting and design should minimise the appearance of the development proposed. Insofar as the equipment may be visible, it should look straight forward in appearance and reflect its function. To

that extent, it should in time become an accepted feature of the local environment in the same way that other forms of communications equipment have been successfully assimilated into townscapes and landscapes at various locations across the UK.

- 6.10 Hence, for all of the above reasons, the site has been selected as the most suitable location for the development. The development proposed accords with key policy objectives, which are reflected in the relevant policies at local level and so should be acceptable in principle, the detail being subject to compliance with the site specific policy framework and the other considerations relating to siting and design.

7. ICNIRP COMPLIANCE

- 7.1 A certificate confirming compliance with the relevant ICNIRP guidelines on public exposure has been supplied with this application. Accordingly, as explained in paragraph 46 of the NPPF, it is not necessary to consider further the health aspects and concerns about them, which include the perception of risk.

8. SUMMARY AND CONCLUSIONS

8.1 In summary, the application is in respect of electronic communications apparatus necessary to improve a public infrastructure network.

8.2 The service provided by the operator is therefore in the public interest and is in very high demand. In the UK there are now more than 82 million subscriptions to mobile networks and mobile services now exceed fixed landlines in terms of customer numbers and usage.

8.3 The public interest of the system is clear from the considerable benefits associated. These include:

- Mobile phones can save lives by enabling immediate contact with the emergency services.
- Mobile phones can be used to summons assistance from the breakdown services in the secure environment of a locked car. This is particularly important to the vulnerable.
- Mobile phones can help facilitate modern forms of working, including greater homeworking. This can bring about an improved balance between home and working life and reduce travel.
- Mobile phones can help minimise unnecessary journeys, so increasing productivity and reducing travel demands.
- Mobile phones can help extend business opportunities into peripheral areas. This important benefit will be considerably enhanced by wireless broadband provision in areas where fixed links will be uneconomic to provide.
- Mobile phones can bring about far greater personal convenience and security.

8.4 The operator's requirement is in the context of network needs associated with a cellular system. These impose particular locational and siting requirements. The technical justification included within this supporting statement clearly

demonstrates the need for this apparatus proposed within the context of the operator's surrounding network.

8.5 The operator has followed national and local planning policy and best practice guidance in the siting and design of its apparatus. This has included:

- Network planning based upon existing sites, including those controlled by Radio Site Management companies like Arqiva.
- Siting at an existing electronic communications site to minimise new sites and help avoid the unnecessary proliferation of new radio masts and sites for them.
- Consultation in accordance with the Code of Best Practice procedures.
- An examination of design options to try and minimise potential visual impact.

8.6 The proposed antennas will comply with all relevant health and safety requirements and will be compliant with the ICNIRP guidelines. There are no exceptional circumstances in this case and therefore no need to consider health effects and related concerns such as the perception of risk further.

8.7 This statement has demonstrated that the proposal is in accordance with local Development Plan policy and 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.

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