



**TELECOMMUNICATION
INSTALLATION**

FOR

**Hutchison 3G UK
Limited**

at:

Existing Telecommunications Site

**WOKINGHAM ROAD FIRE
STATION
READING FIRE SERVICE
WOKINGHAM ROAD
READIN
RG6 1JU**

**SUPPLEMENTARY
INFORMATION FORM**

incorporating

**DESIGN AND ACCESS
STATEMENT**

May 2018

Prepared by:

Daly International

Cell ref:
RDG027 – Wokingham Road
Fire Station

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Wokingham Road Fire Station	Site Address:	Telecommunications Site, Wokingham Road Fire Station, Reading Fire Service, Wokingham Road, Reading, RG6 1JU
NGR:	E 474281 N 172091		
Site Ref Number:	RDG027	Site Type: ¹	Macro

2. Pre Application Check List

Site Selection

Was an LPA mast register used to check for suitable sites by the operator or the LPA?	Yes	No
If no explain why: The proposed works intend to upgrade an existing site. The use of existing sites as a framework for the expansion or development of existing networks is in accordance with local and national (NPPF) planning policies.		
Was the industry site database checked for suitable sites by the operator:	Yes	No
If no explain why: The proposed works intend to upgrade an existing site. The use of existing sites as a framework for the expansion or development of existing networks is in accordance with local and national (NPPF) planning policies. Appendix B of the Code of Best Practice (first published November 2002, revised July 2013) echoes the NPPF's emphasis on the re-development or sharing of existing telecoms sites as a means of reducing the number of such sites to the minimum consistent with the efficient operation of the network.		

Pre-application consultation with LPA

Date of written offer of pre-application consultation:	N/A
Was there pre-application contact:	Yes No
Date of pre-application contact:	N/A
Name of contact:	N/A
Summary of outcome/Main issues raised: As the proposed development is a routine upgrade to an existing site, it was deemed acceptable to proceed without conducting any pre-application consultations, in this instance.	

¹ Macro or Micro

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline Consultation carried out:			
The proposal was rated as GREEN, in accordance with the guidelines set within the code of best practice for telecommunication operators. Due to this rating, and the fact that the development is considered to be a minor alteration to an existing site, no consultation was deemed necessary.			
Summary of outcome/Main issues raised:			
N/A			

School/College

Location of site in relation to school/college:
Earley Pre School is located approximately 220 metres southeast of the proposed site.
Outline of consultation carried out with school/college:
As the proposed works are minor in nature, it was deemed acceptable to proceed without conducting any pre-application consultation, prior to the submission of this application.
Summary of outcome/Main issues raised:
N/A

Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation

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		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	11/05/2018	

3. Proposed Development

The proposed site:	
Telecommunications site, Wokingham Road Fire Station, Reading Fire Service, Wokingham Road, Reading, RG6 1JU NGR: E 474281 N 172091	
Type of Structure : Telecommunications Base Station	
Description: Replacement of 1 no. existing flagpole antenna with 1 no. new tri-sector antenna; installation of 1 no. equipment cabinet within the existing cabin; plus associated ancillary development.	
Equipment Housing: Individual dimensions: SAMI Cabinet	
Length	550mm
Width	600mm
Height	2020mm
Materials :	
Antenna – type of material and external colour:	Steel & GRP and coloured Traffic White (RAL 9016)
Equipment housing – type of material and external colour:	Steel
Reasons for choice of design:	
The existing 'Hutchison 3G UK Limited' telecommunications site is located at Wokingham Road Fire Station, Southwark and comprises of 1 no. flagpole antenna atop the fire training tower and associated equipment located within the ground based equipment cabin. The proposal seeks to replace the existing flagpole antenna with 1 no. new tri-sector antenna with upgraded antennas in order to meet network requirements. The existing site is a well-established telecommunications site, providing 3G network services to the customers of H3G Limited, in the local area. It is a shared installation between two operators, EE Limited and Hutchison 3G UK Limited. In order to meet the increasing demands of faster connectivity, the site needs to be upgraded to include latest 4G technology. The proposed upgrade will enable the site to transmit 4G frequencies in the area, for the local customers of Hutchison 3G UK Ltd. The proposed development is a part of nationwide network integration and upgrade project being rolled out by our clients 'Hutchison 3G UK Limited'. The addition of 4G technology to the existing site necessitates the need for new equipment to upgrade the 2G, 3G and 4G technologies effectively. Other minor ancillary and electrical works are proposed in order to accommodate the new	

technology, as detailed in the attached drawings. Due to the technical constraints of the technology involved, there is no further variation possible in terms of the size or design of the proposed apparatus. They are, however, of the smallest scale possible, capable of providing the required service upgrade.

Given the existence of the base-station for many years and proposed minor changes to equipment, the development should be considered appropriate, when weighed against the social and economic benefits of 4G technology on the local area.

Considering the above points and recognizing the government's encouragement to improve telecommunications connectivity, the development should be acceptable at proposed the location.

4. Technical Information

ICNIRP Declaration attached	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 Limited operates its network in such a way, that the radio frequency power outputs are kept to the lowest levels to commensurate with effective service provision.		
The proposed telecommunications infrastructure, which is 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.		

5. Technical Justification

Reason(s) why site required e.g. coverage, upgrade, capacity:
Purpose of proposed works The existing 'Hutchison 3G UK Limited' telecommunications site is an established telecommunications site, presently providing 3G network services to the customers of Hutchison 3G UK Limited, in the local area. It is a shared installation between two operators, EE Limited and Hutchison 3G UK Limited. As part of the nationwide network integration and upgrade project rolled out by Hutchison 3G UK Limited, there is a specific requirement to upgrade the site at this location. The upgraded site would provide improved 3G services, while introduce new 4G (fast data)

service for local customers and commuters.

The proposed new tri-sector antenna, internal equipment cabinet and MHAs are required to support the provision of 4G technology, within the overall network.

The proposed upgrade works provide a suitable juncture to improve the existing local telecommunications network and demonstrate conformity with national planning policies, which encourage the use of existing sites and sharing of telecommunications installations for upgrade.

The proposal also falls in line, with the guidance of keeping the overall footprint of base-stations to a minimum, to eventually make the development sustainable and reduce the environmental impact on surrounding land-uses.

6. Site Selection Process – alternative sites considered and not chosen

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

Since the proposed works are a minor addition to an existing base-station to upgrade it for newer technologies, no alternative site options have been investigated in this instance. This is consistent with the local and national planning policies, which encourage the use of existing base-stations for technology upgrade.

Land use planning designations:

There are no sensitive land-uses, landscape designations, or heritage designations near the site, which need to be taken into account in this case.

Additional relevant information:

Please refer to Supporting Statement (below).

Contact Details

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(Agent)			
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Signed:	L. Cosgrove	Date:	11.05.18
Position:	Planning Consultant	Company:	Daly International (UK) Ltd

SUPPORTING STATEMENT (INCORPORATING DESIGN AND ACCESS STATEMENT)

This statement forms part of an application on behalf of 'Hutchison 3G UK Limited'. It has been prepared in accordance with the requirements of Section 42 of the Planning and Compulsory Purchase Act 2004 which requires the submission of a Design and Access Statement to accompany planning applications.

To assist your determination this section also provides an assessment against relevant local and national (NPPF) planning policies and the Code of Best Practice.

Application for Planning Permission

This application for planning permission is submitted pursuant to Article 4C of the Town and Country Planning (General Development Procedure) Order 1995 (as amended).

The Application Site

The existing 'Hutchison 3G UK Limited' telecommunications site is located atop the fire training tower of Wokingham Road Fire Station, approximately 3km southeast of Readings Central Business District. There are a small number of commercial properties opposite the fire station but the immediate and wider surrounding area is predominantly residential in nature.

The existing site is a well-established telecommunications site, providing 3G network services to the customers of H3G Limited, in the local area. It is a shared installation between two operators, EE Limited and Hutchison 3G UK Limited. The telecommunication site currently comprises 1 no. flagpole antenna fixed atop the fire training tower, a ground based equipment cabin and associated ancillary development.

The location of the site has been highlighted in the following figure, for your reference.

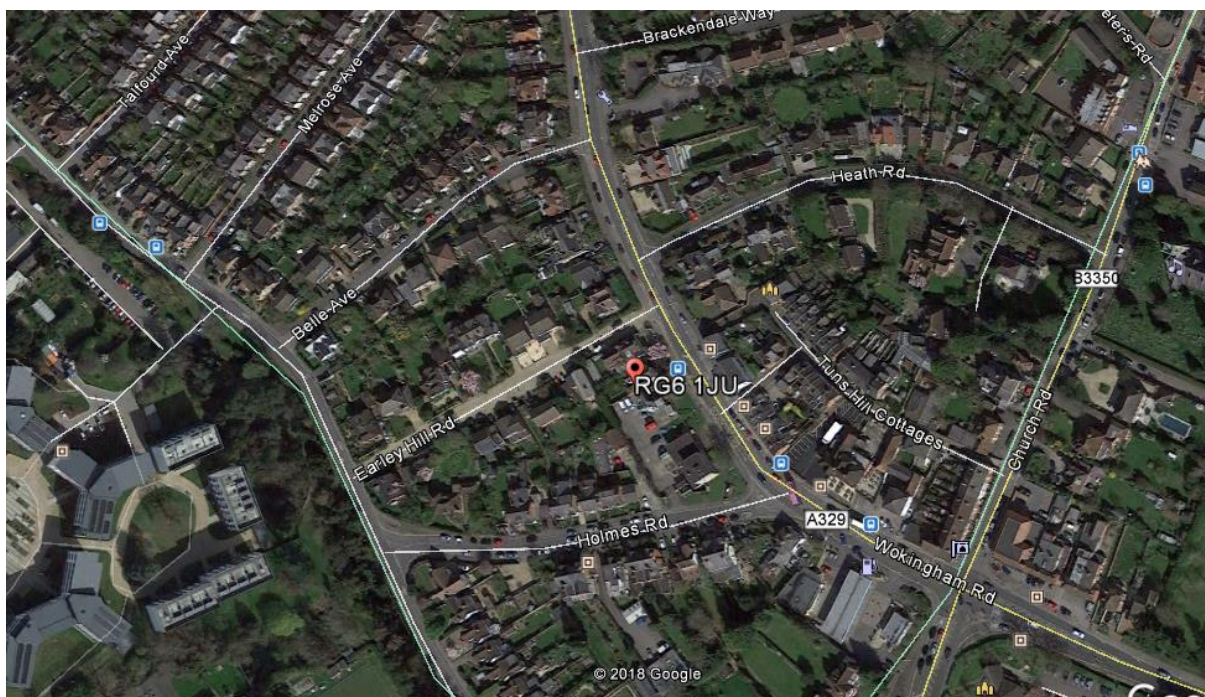


Fig. 1: Location of site [Coordinates – E 474281 N 172091]

Site Design and Appearance

The proposed development involves the installation of a new tri-sector antenna, supporting 3 no. new antennas, 1 no. new internal equipment cabinet and associated ancillary development. The pole, antennas and ancillary apparatus are required to support the provision of new 4G technology, within the overall network.

Since 4G antennas are thicker and heavier in scale, these cannot be safely accommodated on the existing flagpole structure and therefore, a new structure with sufficient structural capacity is required to accommodate the proposed antennas.

Great care has been taken to ensure that the proposed new infrastructure is the smallest that can be deployed, whilst ensuring that satisfactory network function and coverage is achieved. Other minor ancillary and electrical works are proposed in order to accommodate the new technology, as detailed in the attached drawings.

The proposed new tri-sector antenna is to be located on a new support structure in the same location as the existing flagpole antenna. Siting the new structure in this location ensures that the existing installation is replicated as far as is practicable. The visual change involved would be low. It is not considered to be of a scale that may harm the setting or overall character of the area and should be considered acceptable, since the benefits of 4G coverage, the discrete siting, and the appearance of apparatus would outweigh any minor visual impact.

Access

Access to the site is from Holmes Road.

Possible Electrical Interference

We can advise on behalf of our clients that the proposed installations should not cause any undue electrical interference for nearby residents. Hutchison 3G UK Limited operates within radio frequency bands which are licensed and specific to them, and this is regulated in the UK by the Office of Communications (Ofcom).

Health and Mobile Phone Base Stations

The Mobile Phones and Health Report (2000), by the *Independent Expert Group on Mobile Phones* under the chairmanship of Professor Sir William Stewart (the *Stewart Report*) concluded that "the balance of evidence indicates that there is no general risk to the health of people living near to base stations on the basis that exposures are expected to be small fractions of the guidelines".

The Stewart Report recommended that, as a precautionary approach, the *International Commission on Non-Ionizing Radiation Protection* (ICNIRP) guidelines for public exposure be adopted in the UK. In response to the report, Government has stated that emissions from

base stations should meet the ICNIRP guidelines and that if they do then local authorities need take no further action.

One of the recommendations of the Stewart Report was to establish a research programme to address uncertainties regarding mobile phone base stations and health. This programme was called the Mobile Telecommunications and Health Research (MTHR) Programme. The final report from this programme was published in February 2014. The report noted that the research conducted found no evidence of biological or adverse health effects from the radio waves produced by mobile phones or their base stations.

In June 2011 the World Health Organisation (WHO) noted that

"...A large number of studies have been performed over the last two decades to assess whether mobile phones pose a potential health risk. To date, no adverse health effects have been established as being caused by mobile phone use.."

WHO factsheet 193: Electromagnetic fields and public health: mobile telephones

In April 2012 the Health Protection Agency's independent *Advisory Group on Non-ionising Radiation* (AGNIR) published a report entitled "Health Effects from Radiofrequency Electromagnetic Fields". This report concluded that there is no convincing evidence that mobile phone technologies cause adverse effects on human health. In addition, AGNIR found that although a substantial amount of research has been conducted, there is no convincing evidence that RF field exposure below the internationally agreed guideline levels applied in the UK causes health effects in adults or children.

All Hutchison 3G UK Ltd. installations are designed, constructed and operated in compliance with the precautionary ICNIRP public exposure guidelines. An ICNIRP certificate is provided as part of this application.

Noise

There will be no noise issues related to this site.

Planning Policy Framework

Local Planning Policy:

The relevant planning policy which guides any development in the local area is the Reading Borough LDF Core Strategy and Sites and Detailed Policies Document, altered January 2015.

It would be worth noting the following key policy:

DM21: TELECOMMUNICATIONS DEVELOPMENT

Proposals for telecommunications development will be permitted provided that:

- They do not have an adverse impact on the visual amenity of the surrounding area;
- The apparatus will be sited and designed so as to minimise its visual impact by the use of innovative design solutions such as lamp column 'swap-outs' or concealment/camouflage options; and

- Alternative sites and site-sharing options have been fully investigated and it has been demonstrated that no preferable alternative sites are potentially available which would result in a development that would be less visually intrusive.

National Planning Policy

The National Planning Policy Framework (NPPF) was published on 27th March 2012. The NPPF supports high quality communications infrastructure and recognises it as a strategic priority.

At paragraph 42 it states: *"Advanced, high quality communications infrastructure is essential for sustainable economic growth. The development of high speed broadband technology and other communications networks also plays a vital role in enhancing the provision of local community facilities and services."*

Paragraph 44 states *"local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development"*.

The NPPF goes on to state at paragraph 46 that: *"Local planning authorities must determine applications on planning grounds. They should not seek to prevent competition between different operators, question the need for the telecommunications system, or determine health safeguards if the proposal meets International Commission guidelines for public exposure."*

The proposal is supported by the guidance in paragraph 65 of the NPPF, which states that:

"Local Planning Authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal's economic, social and environmental benefits.)"

Evaluation in Light of Local and National Policy

The proposed works are the most minor possible whilst allowing for the upgrade of the existing telecommunications site, to improve existing coverage and introduce 4G coverage in the local area. The result of the proposed works will be the removal and replacement of the existing flagpole with a proposed new tri-sector antenna with upgraded antennas, installation of a new equipment cabinet; plus minor ancillary works necessary to effectively upgrade the site.

With reference to local policy, the proposed solution is considered as a sensitive design solution to mitigate any impacts on the immediate and wider surrounding area. The proposal utilises an established telecommunications site and the visual impact has been minimised as far as practicable as the tri-sector antenna seeks to replicate the existing installation. In addition the benefits of 4G connectivity, in terms of social inclusion, economic and travel benefits, would outweigh the most minor visual change of the structure and additional apparatus.

The national planning policies highlight the government's positive stance towards telecommunications development and mobile phone connectivity. The policies highlight the

environmental and social benefits that telecommunications can provide, if employed correctly.

As mentioned earlier, the proposed site is the upgrade of an existing site, to ensure no further masts are erected in the local area. The discrete siting and colouring of apparatus ensures that the visual quality of development is not altered significantly, to be detrimental to the surrounding area.

As recommended by NPPF paragraphs 42, 43 & 46, mobile phone base stations play an important part of community amenities. The proposed works meet the guidelines of the International Commission on Non-ionising Radiation Protection (ICNIRP). An ICNIRP certificate has been attached with the application, in this regard.

Other sites have not been identified as it is an upgrade of an existing base station. It is therefore considered, that the proposed development fully adheres to the guidance contained within the local planning policies and NPPF.

Code of Best Practice on Mobile Network Development

The *Code of Best Practice* (first published November 2002, revised November 2016) is produced jointly by all Mobile Phone Operators and representatives of Central and Local Government. It provides clear and practical advice to ensure the delivery of significantly better and more effective communication and consultation between operators, local authorities and local residents.

Though the Code is a non-statutory document, as it was prepared jointly by representatives of central and local government and the mobile phone industry, it is considered to be a material consideration in this case.

General siting and design principles for all telecommunications installations are provided in Appendix A of the Code. The principles exist subject to the following variables:

"...site conditions, technical constraints, landscape features and coverage and capacity requirements".

Appendix A echoes the NPPF's emphasis on the re-development or sharing of existing telecoms sites as a means of reducing the number of such sites to the minimum consistent with the efficient operation of the network.

In addressing the re-development of sites upon rooftops (or other structures) Appendix A provides a series of design *aims*. With respect to the proposed scheme these include:

- *Keep in proportion to the building or structure;*
- *Respect architectural style;*
- *Have minimal impact above the roof line commensurate with technical constraints;*
- *Not be detrimental to important views and skyline;*
- *Avoid creating clutter;*

- *Use clean lines and maintain symmetry*
- *Be painted to correspond with the background or to reduce contrast.*

In summary, the planning application submitted herewith fully embraces both the voluntary and compulsory good practice principles contained within the Code.

Conclusions

National planning policy aims to facilitate the growth of new and existing telecommunications systems and operators have obligations to meet customer demands for improved quality of service. This application details the technical need for the replacement and installation of apparatus, to provide improved customer service for customers of Hutchison 3G UK Limited.

Hutchison 3G UK Ltd. has identified that this upgrade is required to improve the service provided and to meet the demands of customers in this area. The proposed installation represents both the optimum planning/environmental and technical solution in this instance. As such, the development as proposed is in accordance with the National Planning Policy Framework as defined above.

For the reasons set out above in the report, we consider that this application should be approved.