

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name: Berkshire House	Site Address:	252-256 Kings Road Reading Berkshire RG1 4HP
NGR: 472642, 173223		
Site Ref Number: 61354	Site Type: ¹	Macro

1.1 Background

In April 2010 T-Mobile UK and Orange UK merged to form a 50:50 joint venture known as 'Everything Everywhere', now trading as EE Ltd. EE Ltd is licensed to operate GSM (Global Systems for Mobile Communications), UMTS (Universal Mobile Telecommunications System) and LTE (Long Term Evolution) in the United Kingdom for the delivery of Second, Third and Fourth Generation telecommunication services. H3G Limited (known as the operator '3') is also sharing the EE network.

EE and 3 have radio base stations on the rooftop of Berkshire House that provides network coverage to the surrounding area and form part of the Operators national linked networks. The landlord has advised that plans are being made to extend the roof of the building, thus it will be necessary to relocate some of the telecommunications apparatus on the roof. The opportunity is also been taken to consolidate and upgrade the equipment on the building.

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: N/A – Site upgrade		
Was the industry site database checked for suitable sites by the operator:	Yes	No
If no explain why: N/A – Site upgrade		

Annual roll out consultation with LPA

Date of last annual rollout information/submission:	13 October 2015
Name of Contact:	Stephen Vigar
Summary of outcome/Main issues raised:	No issues are noted as having been raised.

¹ Macro or Micro

Pre-application consultation with LPA

Date of written offer of pre-application consultation:	10 November 2015	
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: No comments have been received.		

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Green	Amber	Red
Outline Consultation carried out: In accordance with the guidance lines contained within the Code of Best Practice on Mobile Network Development in England (2013) (and previously the Code of Best Practice on Mobile Phone Network Development 2002), the site was assessed against the Traffic Light model and assigned a rating of green. Therefore, in line with the requirements of the Code, and due to the minor nature of the works proposed, community consultation has not been undertaken.			
Summary of outcome/Main issues raised: N/A			

School/College

Location of site in relation to school/college: There are no schools located close to the site, however Reading College is located across Kings Road to the north of the site.
Outline of consultation carried out with school/college: Consultation was carried out with the College on 10 November 2015.
Summary of outcome/Main issues raised: No comments have been 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 – Full planning application.		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	N/A – Full planning application.	

3. Proposed Development

The proposed site:
The application site is the rooftop of an existing office building. The existing installation consists of a stub tower which accommodates 3 no. antennas and 6 no. pole mounted antennas elsewhere on the building and two large equipment cabins. The development would consolidate this equipment. The existing 3 no. antennas are proposed to be removed, the 6 no. pole mounted antennas on the building would be relocated to the stub tower. In addition, the large equipment cabins would be removed and replaced with 4 no. smaller cabinets adjacent to the stub tower. The host building is located within the Eldon Square Conservation Area. The site currently provides 2G and 3G coverage to the surrounding area for EE, along with 3G coverage for H3G.

Type of Structure:	
Description:	The removal of 3 no. antennas from the existing stub tower, the relocation of 6 no. pole mounted antenna from rooftop to stub tower, the removal of 2 no. equipment cabins and their replacement with 4 no. cabinets and development works ancillary thereto.
Overall Height:	30.2 metres to top of antennas on stub tower
Height of existing building:	24.1 metres (plantroom level)
Replacement Equipment Housings:	
Length:	0.75m/ 0.6m/ 0.75m/ 0.6m
Width:	0.55m/ 0.5m/ 0.6m/ 0.48m
Height:	1.98m/ 1.52m/ 2.1m/ 1.6m
Materials:	
Tower/mast etc – type of material and external colour:	N/A – no changes proposed to stub tower.
Equipment housings – type of material and external colour:	Steel coloured grey.

Reasons for choice of design:
The applicant gives due regard in designing all new sites and site upgrades to the desire to limit visual impact through good design, particularly in respect of sensitive buildings, or those in sensitive areas, such as this one. The Applicant has limited the size and amount of apparatus proposed to that required for operational effectiveness. A scheme has been designed which would reduce the overall impact on the building. The overall number of antennas would be reduced from nine to six, and the two large equipment cabins are proposed to be removed from the building. These would be replaced by 4 no. smaller cabinets. The equipment would all be consolidated into the area around the stub tower.

4. Technical Information

ICNIRP Declaration attached	Yes	No
ICNIRP 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 the site are taken into account.		

Frequency:	1800 MHz Cellular Band 2100 MHz Cellular Band
Modulation characteristics ²	GMSK, QPSK & QAM
Power output (expressed in EIRP in dBW per carrier)	Max of 35dBW
In order to minimise interference within its own network and with other radio networks, EE operate 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'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.	
Height of antenna (m above ground level)	29.2 metres (to mid-point of antennas)

5. Technical Justification

Reason(s) why site required e.g. coverage, upgrade, capacity:
The existing installation provides 3G coverage for EE and H3G in the local area (along with 2G coverage for EE Ltd) as well as forming part of their wider linked networks. The proposed development is required to facilitate works to the roof by the Site Provider. Equipment would be consolidated and located on the existing stub tower and plant room.

² The modulation method employed in 2G (GSM) is GMSK (Gaussian Minimum Shift Keying) which is a form of Phase modulation

The modulation method employed in 3G (UMTS) is QPSK (Quad Phase Shift Keying) which is another form of Phase Modulation

The modulation method employed in 4G (LTE) is 64 QAM (Quadrature Amplitude Modulation) which is another form of Phase Modulation

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

Site Name and address	Indicative NGR	Reason for not choosing
		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*". There is no such justification in this case.

No alternative sites have been sought, in this instance, as it is the upgrade of an existing installation which would have a reduced overall impact once completed.

Additional relevant information:

Siting and Appearance

In terms of siting, the selected option is a well-established telecommunications site. The proposal now subject of this application seeks to consolidate the equipment to the stub tower and plant room. It is submitted that the siting is wholly appropriate.

It is acknowledged that the building is located within the Eldon Square Conservation Area, and particular regard has been had to ensuring that no harm would come to the local environment as a result of the proposal. As the overall impact would be reduced it is considered the development to be acceptable.

The proposal would result in less telecommunications apparatus on the building and a less "busy" rooftop appearance, though views are already somewhat restricted due to the height of the building and positioning of the apparatus. The planned rooftop extension would not affect the height of the existing plantroom or the stub tower, and the top of the relocated antennas would be the same as those currently in situ. The relocated antennas are slimmer and so, despite the wider arrangement on the new headframe, visibility would not be increased and harm to both the site and surrounding Conservation Area would be avoided.

It is considered that the proposal represents the optimum siting and design option available to the Applicants, achieving as it does a balance between meeting the technical requirement and avoiding harm to the host building and the surrounding area.

PLANNING POLICY

National Planning Policy Guidance

National Planning Policy Framework (2012) (NPPF)

The NPPF, which came into force on 27 March 2012, has replaced PPG8 in terms of national policy specifically relating to electronic communications development.

Paragraph 14 states *'At the heart of the planning system is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking. ...*

'For decision taking this means:

- *approving development proposals that accord with the development plan without delay; and*
- *where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:*
- *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; or*
- *specific policies in this Framework indicate development should be restricted.*

Included within the core planning principles to be taken into account in paragraph 17 are the following relevant points:

- *planning should proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;*
- *always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;*
- *support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy);*
- *conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;*

Paragraph 21 advises LPA's to *'plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries;'* and paragraph 29 recognises that *'Smarter use of technologies can reduce the need to travel.'* The upgrade proposed in this application will enhance existing services and facilitate additional 4G technology, allowing for home working and can reduce the need to travel, thus contributing to the sustainability agenda.

Leading on from this, Section 5 of the NPPF addresses supporting high quality communications infrastructure. Paragraph 42 sets out that *'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.'*

It has already been noted that Paragraph 43 advises that *'Existing masts, buildings and other structures should be used, unless the need for a new site has been justified. Where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate.'*

The proposed upgrade of an existing radio base station directly accords with NPPF guidance.

Paragraph 44 emphasises that LPAs *'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.'* It sets out that LPA's *'should ensure that:*

- *they have evidence to demonstrate that telecommunications infrastructure will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and*

The European Commission has issued a directive (2004/108/EC) governing all forms of electronic equipment regarding the interference that such equipment produces and, in turn, its immunity to interference from outside.

Any equipment compliant with that directive, such as that proposed in this application, is unlikely to suffer or cause interference. However, if there is a complaint of interference to domestic radio and television, in the first instance the BBC will assist, via the BBC Help Receiving TV and Radio web site at: <http://www.bbc.co.uk/reception/>. If, following investigation, there is evidence of interference, the operator will ensure any issues associated with their equipment are addressed. For any other types of interference, Ofcom will investigate.

Finally, Paragraph 46 clarifies that LPA's *'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.'*

ICNIRP compliance documentation is included within the accompanying application papers, thus the only remaining considerations must be planning related, specifically in this case siting and design, both of which are considered wholly appropriate given the use of an existing facility mitigation of visual impact as discussed in the preceding subsection.

The proposal outlined within the document and the supporting enclosures, is in complete accordance with the guidance as set out in the National Planning Policy Framework.

Development Plan Policy

Section 70 of the Town and Country Planning Act 1990 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 development plan for Reading Borough Council comprises the Core Strategy Adopted January 2008 (altered January 2015), the Reading Central Area Action Plan (2009) and the Sites and Detailed Policies document Adopted October 2012 (altered January 2015).

Of most relevance to the development are policies within the Sites and Detailed Policies document. Policy DM21 deals with Telecommunications Development and aims to keep to a minimum the impact

of development. The document also deals with development within Conservation Areas. Paragraph 9.1.13 states (in part): "*Conservation Areas are areas of special architectural or historic interest, the character and appearance of which should be conserved or where appropriate enhanced.*" With an overall reduction in the impact of the development it is considered the scheme would comply with Development Plan policy.

Overall, it is considered the proposal complies with both national and local policy. In terms of national policy the proposal is sympathetically designed, it minimises the number of installations and has a high quality of design. It would enhance the provision of local community facilities and services.

The proposal has been assessed against the criteria of the policy and no conflict has been identified. The proposal seeks consent for minor upgrade works at an existing site with an overall reduction in impact.

Summary

National planning policy is to facilitate the growth of new and existing telecommunications systems, and operators have obligations to meet customer demands for improved quality of service.

The specific requirement of the operator in this instance can be achieved through the minor upgrade of an established site and without harm to the local environment. The proposed upgrade is considered to be compliant with relevant policies.

The proposal is fully compliant with ICNIRP guidelines and a declaration of compliance is included.

Contact Details

Name: (Agent)	Chris Andrews	Telephone:	01932 411011
Operator:	EE Ltd	Fax no:	01932 411012
Address:	Phoenix House, Pyrford Road, West Byfleet, Surrey, KT14 6RA	Email Address:	chris.andrews@waldontelecom.com
Signed:		Date:	26/11/2015
Position:	Planner	Company: (on behalf of the above operator)	Waldon Telecom