SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Lord's Croft Lane	Site Address:	Grass Verge at Lord's Croft Lane, Haverhill, Suffolk, England, CB9 0ER
National Grid Reference:	E:567389 N:245478		
Site Ref Number:	CS-309339	Site Type:[1]	Macro

2. Pre-Application Check List

Site Selection

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	No
If no explain why: Public access system checked		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why:		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	Yes
Date of pre-application contact:	2.10.26
Name of contact:	See below
Summary of outcome/Main issues raised: A pre-application consultation has preceded this submission on 2nd October 2026. The consultation included a written description of the proposal, the background to it, draft plans, a consultation plan and discounted site information. No consultation response has been provided, and it has been considered appropriate to progress to application stage and discuss the merits of the proposal with the LPA upon validation.	

[1] Macro or Micro

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Annual area wide information to planning authority

Has annual area wide information been provided?	No
Summary issues raised: Cornerstone's commercial relationship with the operators hosted in this proposal, i.e., VMO2, has changed, effectively increasing an independence to work with other companies in the deployment of mobile infrastructure. It means Cornerstone no longer have visibility of the operator's full update plan. However, Cornerstone is fully committed to working closely with Local Planning Authorities and following best practice guidance. Cornerstone aim to engage and work with the planning department at the earliest opportunity from when instructed to deliver new infrastructure within your Local Authority area and often conduct strategic pre-rollout engagement meetings to discuss our wider rollout. If the Local Planning Authority would like a meeting to discuss wider Cornerstone rollout plans, then please advise as we recognise the importance of developing long term partnerships and will always work with you to deliver improved mobile connectivity.	

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline of consultation carried out: The following were consulted as part of the pre-application process for the initial application: • Haverhill Central Ward Councillors • Haverhill Town Council • Nick Timothy MP			
Summary of outcome/main issues raised (include copies of relevant correspondence): No response has been received at the time of making the application.			

School/College

Location of site in relation to school/college (include name of school/college): N/A
Outline of consultation carried out with school/college (include evidence of consultation): N/A
Summary of outcome/main issues raised (include copies of main correspondence): N/A

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Civil Aviation Authority/Secretary of State for Defence or the operator of the civil safeguarding area or defence safeguarding area notification (only required for an application for prior approval)

Will the proposed development be on a civil safeguarding area or a defence safeguarding area?	Yes	No
Has the Civil Aviation Authority/Secretary of State for Defence/operator of the civil safeguarding area or defence safeguarding area been notified?	Yes	No
Details of response: N/A		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	16.10.2026	

3. Proposed Development

The proposed site:
Cornerstone are in the process of progressing a suitable site in this area of Haverhill for a replacement radio base station. As part of Cornerstone's continued network improvement program, there is a specific requirement for a new installation at this location to provide improved 2G/4G and new 5G coverage and capacity, ensuring that this area of Haverhill maintains access to the latest technologies for VMO2 service provision. The operator currently provides coverage in this area from an existing installation at Haverhill Police Station, Swan Lane. The existing installation is owned/hosted by a third party telecommunications operator, Airwave, and VMO2 rent space on it for their equipment. The existing structure is not tall enough to host the upgraded equipment to allow VMO2 to provide new 5G technologies to the surrounding area. As it is not a structure that is owned by VMO2, they have no ability to upgrade the existing structure. In addition, due to security measures with the site being located within a police station, this causes difficulties with gaining access to the site for maintenance works. As such, in order to provide the latest 5G technologies to the area and to overcome access issues, VMO2 are seeking to install their own site in the nearby area. A replacement installation in this location will ensure that the latest high quality 2G/4G coverage is maintained and new 5G service provision is provided in and around this busy part of central Haverhill. The application site is located on a grass verge adjoining the footway on the south-western side of Lord's Croft Lane in Haverhill. The immediate surroundings comprise roadside grassed areas, mature trees and shrubs, with nearby buildings and access roads to the north-east. Existing street furniture includes lighting columns and road signage.

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Fig. 1: Site Photo

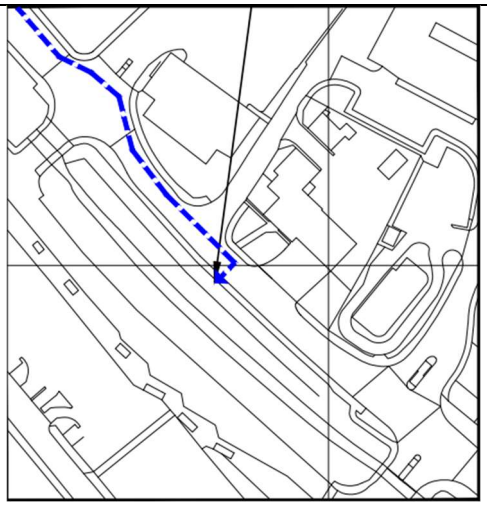


Fig. 2: Location

Enclose map showing the cell centre and adjoining cells if appropriate:

The dynamic nature of technological advances in the telecommunications industry coupled with ever increasing demand from subscribers dictates a continual reinvestment programme on the part of licenced operators and as a result, and in line with their licence requirements, companies such as Cornerstone are constantly developing, refining and modernising mobile network infrastructure.

Virgin Media O2 (VMO2)[2] currently provide the area with network services via the existing Airwave site at Haverhill Police Station and other peripheral base station sites but additional infrastructure is required to replace the existing 2G/4G coverage whilst also allowing the operator to provide the latest 5G technologies to the area.

[2] Virgin Media O2 was formed in June 2021 as a 50:50 joint venture between Liberty Global and Telefónica through the merger of their respective Virgin Media and O2 UK businesses.

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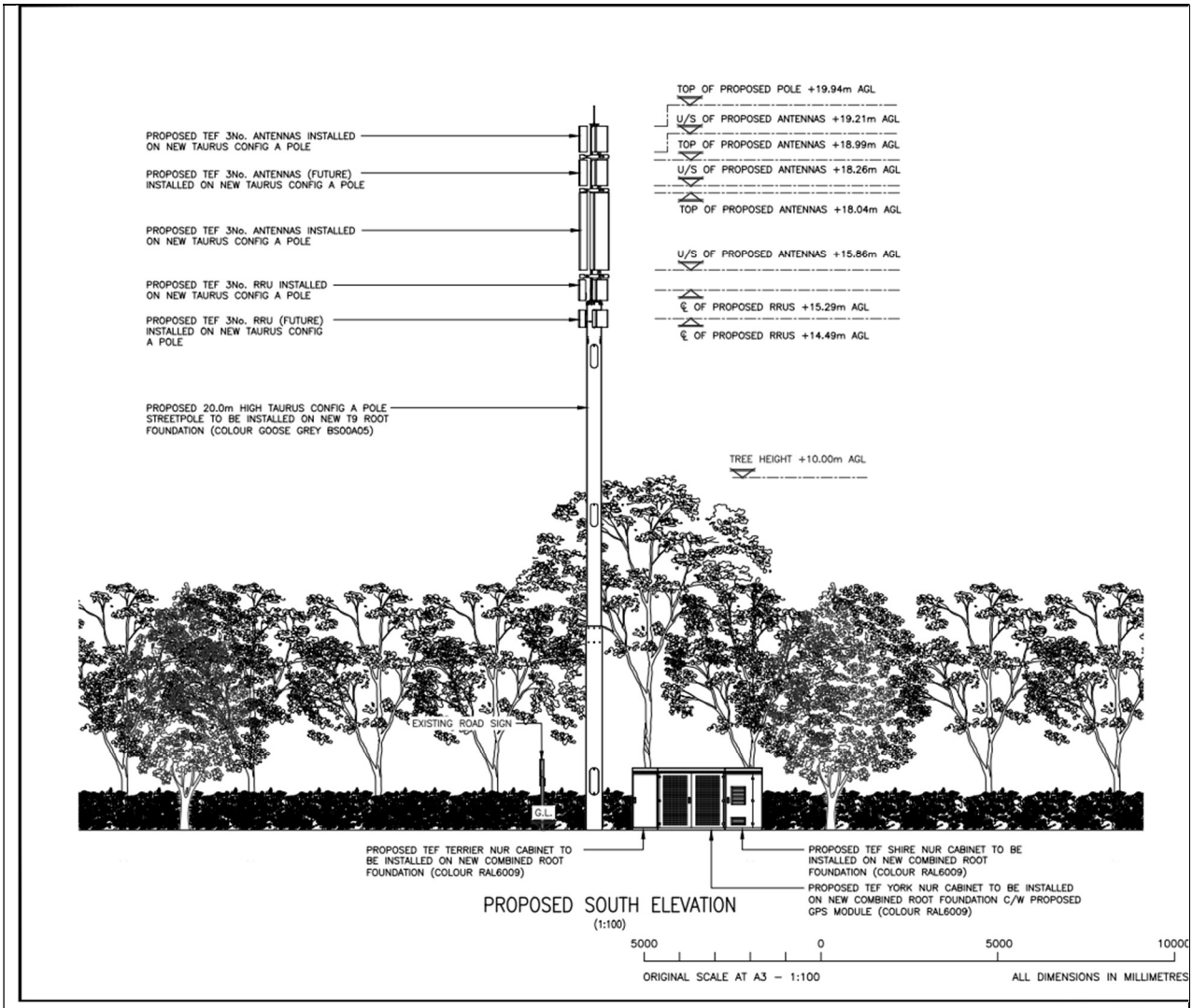


Fig. 3: Proposed Development (Plan 301 proposed elevation extract)

Type of Structure *(e.g. tower, mast, etc):*	*Taurus streetpole*
Description: The proposed installation of a telecommunications base station comprising of a 20m monopole supporting 9 antennas, 3 no ground based equipment cabinets, and ancillary development thereto. All apparatus has been limited to a minimum amount and dimension for the purpose of addressing the operational brief.	

Overall Height:	20m
Height of existing building:	N/A
Equipment Housing: York cabinet	
Width	1900mm
Depth	660mm

In the first instance, all correspondence should be directed to the agent.

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Height	1750mm
Equipment Housing: Shire cabinet	
Width	1050mm
Depth	660mm
Height	1750mm
Equipment Housing: Terrier cabinet	
Width	1050mm
Depth	660mm
Height	1750mm
Materials:	
Tower/mast etc – type of material and external colour:	Steel, BS00A05 Goose Grey
Equipment housing – type of material and external colour:	Steel, RAL6009 Green

Reasons for choice of design, making reference to pre-application responses:

The design of any communications infrastructure is dictated primarily by operational requirements and secondly by the development's setting.

Following a sequential approach to site selection, further details of which are provided below, a ground-based mast at the nominated site was deemed the best available option.

Once the site was selected, the network planning team and design teams undertook a detailed site assessment to ascertain what equipment would be required to fulfil the operational brief from this location. This involved the use of network coverage prediction software tools and an onsite panoramic assessment to determine the necessary antenna and dish heights, orientations and numbers for optimum coverage and integration in the network to be achieved.

From an operational perspective, the operator must ensure the following when devising a design solution for any site:

Antennas

- Need to be located at a height to transmit effectively and efficiently without signal being impeded by surrounding manmade and natural features within the landscape, known as clutter. Because 5G technologies operate in higher frequency bands than older technologies, attenuation of the radio signal is naturally higher and more prone to the effects of clutter. This means that operators will often require a higher structure or antenna position to achieve the same degree of coverage footprint as preceding generations.
- Where possible, the antennas should also be tilted and orientated according to bespoke need and to maximise coverage, allowing them to best 'see' their target area.
- They also need to be located at a height and in a position to ensure ICNIRP compliance.

Cabinets

- Required to house the equipment that allow the antennas to function, these need to be located at the base of the mast to allow the feeder cables to run up the mast to serve the antennas. Seen on their own merits equipment cabinets and meter pillars are permitted development (only if they do not exceed 2.5m^3 each) that don't require a formal planning determination and are likened to cabinets deployed by utility companies throughout the UK

The multiskilled design visit, onsite assessments and software predictions concluded that 20m to top of antenna height would be necessary for new ground-based mast at the nominated site, in order to clear the immediate clutter

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and take account of topography. Whilst Cornerstone also has monopole and lattice mast design options for this height, the roadside nature of the site and limited width of the footway mean that a street furniture style mast was the only realistic mast type that would be viable in this location. A set of standard cabinets is also proposed to support the transmission apparatus to be installed upon the mast.

Due to the multigenerational, height needed and modern nature of the technologies involved, the Cornerstone design portfolio no longer includes a 'camouflaged' design option, (for example, as 'telegraph pole' solution as was available in earlier generations of technology), as shrouding or screening 5G antennas has a detrimental impact upon their operation, to the extent that it often renders such development unviable. In addition, 4G and 5G antennas and their feeder cables are much bigger and heavier than their counterparts in earlier generations of base station development, as they carry more data. This bigger equipment requires a more robust structure which in turn makes effective disguise a difficult task.

Further details in relation to each of the ground-based mast options, and those for building-based solutions, have been provided in the information below under the subheading 'Siting and Design Considerations' and in **Appendix A** to this Statement.

Health and Safety - including ICNIRP compliance

International Commission on Non-Ionizing Radiation Protection Declaration has been attached.

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, the lead operator in this development:

- VMO2

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 their network, the radio base station that is the subject of this application will be configured to operate in this way.

All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation, or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference.

The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.

4. Technical Justification

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

Operational Brief

As indicated above, the proposed development that forms the basis of this application has been devised by Cornerstone, on behalf of the operator, VMO2, to provide replacement 2G/4G network coverage and capacity, and to establish new 5G connectivity, to the benefit of network users that live, work and travel in the Haverhill Area.

Operational Justification

Modern communications network infrastructure must be located in the area for which it is to serve. It is also imperative that the infrastructure capacity is in place to cope with network demand. Furthermore, in seeking a replacement for any established base station site, proximity to the existing infrastructure is a key consideration if the new site is to replicate existing coverage and fit seamlessly into the existing and planned network for the wider area.

Please note that Cornerstone would not be choosing to deploy new infrastructure unless it were the only means of addressing the operator's network requirements, as there are significant financial and time and effort implications for doing so.

Before deciding to pursue a new base station development, the possibility of upgrading and optimising the existing sites in the wider network to fulfil the coverage requirements in the intended target area has been evaluated but the peripheral positions of the neighbouring cell solutions mean they are simply too far removed to be able to fulfil the operational brief.

Demand and Expectation

The dynamic nature of technological advances in the telecommunications industry coupled with ever increasing demand from subscribers dictates a continual reinvestment programme on the part of licenced operators and as a result, and in line with their licence requirements, companies such as Cornerstone are constantly developing, refining and modernising mobile network infrastructure.

To set the scene on the growing demand for effective communications networks over recent years we would refer the reader to the following Ofcom publications. One would first draw attention to an Ofcom discussion paper publication entitled 'Mobile Networks and Spectrum', dated 09 February 2022[3], which considers the future demand for mobile services encouraging longer-term thinking about spectrum for mobile networks and how consumer and business needs can be met. Section 2 of the paper includes the following information under the subheading 'The growth of mobile':

> *"In recent years we have seen an average 40% year-on-year growth in demand for mobile services provided over public mobile networks. This growth has been driven by the development of new applications and enabled by evolving technologies and consequent changes in consumer behaviour.*

[3] https://www.ofcom.org.uk/__data/assets/pdf_file/0017/232082/mobile-spectrum-demand-discussion-paper.pdf

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We expect demand for mobile data will continue to grow as we rely on it ever more to carry out daily activities like shopping, gaming, banking and watching movies. Demand is likely to be stimulated further as new and more sophisticated applications are developed, and by the development of machine-to-machine and machine-to-device applications."

Paragraphs 2.5-2.7

In publishing the discussion paper, Ofcom welcomed stakeholder inputs on the initial thinking, including on the potential opportunities and challenges associated with network densification in the UK and whether there are opportunities for more spectrum to be made available for mobile use on a local basis, so that they may then develop a future strategy for mobile spectrum.

Following on from the above, a conclusions paper has since been published by Ofcom on 06 December 2022, entitled 'Ofcom's future approach to mobile markets and spectrum'[4], within which Section 1 'Overview' confirms:

"We expect demand for mobile data to continue to grow as greater use is made of data-hungry services and as new technologies enable new uses."

Paragraph 1.1

And continues under the subheading 'Our future approach':

"Network quality is likely to be of growing importance to customers."

So, there should be no doubt that there is a customer expectation and Ofcom requirement for continued investment by operators to ensure they accommodate ever-increasing customer demands with network quality and improvement where necessary.

Who will be benefit from improved coverage and capacity?

According to recent figures published by MobileUK[5] it was estimated that there are 87 million active mobile subscriptions in the UK and according to recent figures produced by www.which.co.uk [6]in an article titled 'Best and Worst UK mobile networks', the customer base of the operator is as follows:

- VMO2 currently have approximately 24 million customers (approx. 28% of the market)

Based on these figures, one can assume that a similar percentage of mobile network users in the local area would benefit from the proposal. It should, however, be noted that these figures do not include customers who use each of the operators' Mobile Virtual Network Operators (MVNOs)[7]. Most MVNOs do not publicly release subscriber counts but those that will benefit from the proposal include the following:

- VMO2: Giffgaff, Sky Mobile, Tesco Mobile

How people in the UK are using mobile communications networks

The 'Online Nation Report 2025'[8] produced by Ofcom and published in December 2025, confirms the following:

[4] https://www.ofcom.org.uk/__data/assets/pdf_file/0036/248769/conclusions-mobile-spectrum-demand-and-markets.pdf
[5] https://www.mobileuk.org/mobile-facts
[6] https://www.which.co.uk/reviews/mobile-phone-providers/article/mobile-phone-provider-reviews/best-mobile-networks-overview-amhDx1F0z41t
[7] MVNOs are providers that offer mobile services without their own signal or infrastructure, i.e., they piggyback on one of the four major networks
[8] https://www.ofcom.org.uk/siteassets/resources/documents/research-and-data/online-research/online-nation/2025/online-nations-report-2025.pdf?v=409837

- UK adults spend an average of 4 hours 30 minutes a day online
- Smartphones accounted for the majority of online time for both genders (men: 75%; women: 79%).

Not everyone, especially those in more rural or lower income areas, has access to fixed broadband, so many rely on smart devices to get online. Because mobile connectivity is now essential to daily life, inadequate mobile infrastructure can prevent users from accessing vital digital services. If these gaps persist, the Government's wider digital goals will not be achieved.

How mobile networks operate

The reader may be aware that cellular networks are made up of a series of individual cell areas, each of which has a base station within it to provide service to that particular area. Each base station has a maximum capacity for traffic, (i.e., the number of handset users that can connect to it at any one time), and oversubscription by users will result in poor customer connection experience such as connection failures, dropped calls and a reduction in mobile broadband data speeds for both uplink and downlink. It is therefore imperative that adequate network infrastructure is in place to cope with demand.

A good analogy for describing a cellular network is that of a patchwork quilt with each cell area being one of the many patches that are sewn together making up the network 'quilt'. The base stations themselves will require a supporting structure, such as a mast or high building, to support antennas and dish and to elevate such transmission equipment above clutter, such as tall trees and buildings and whilst taking account of topography, all of which could impede signal, and to ensure ICNIRP compliance. Associated cabinets for housing radio equipment and power connections are also deployed to service the antennas.

Telecommunications base stations receive and transmit to mobile devices using radio waves. The antennas operate like an aerosol spray with signal transmitted along a central orientation and dissipating with distance. Transmission dish links (which are required where fibre connections are not available) operate on a direct line of sight basis, linking with dishes on other base station sites elsewhere within the wider network. The dish or fibre links also connect the base station to a master control centre that manages the call handover process that occurs when a mobile user moves from one cell area to another, whilst also providing telemetric monitoring to ensure the site is working properly and offer remote maintenance.

Mobile connectivity, service and capacity is required where customers live, work, travel and enjoy recreational time. In the early days of mobile communications, peripheral locations, high-level topographies and large-scale masts were often identified in order that transmission from a new base station could cover an expansive geographical area. However, whilst this approach was viable for early network generations, the number of mobile device users and the need for connectivity has dramatically increased with time, as have the advancements in mobile technology itself. Quite often it can be the case that although a degree of coverage is available in an area, demand exceeds the base station's capacity meaning that calls, text and data usage services are not available to all those wishing to use the network. As a result, the cellular network construction and operational criteria have changed over time too. Because modern networks use higher frequencies with faster data rates whilst serving significantly increased numbers of mobile device users, typical network cell areas (i.e., the geographical area targeted for coverage and capacity for which a base station development provides a solution), are now smaller in their geographical expanse and tend to be directly proportionate to the number of users within it. They are also, therefore, greater in their number with base stations operating at a lower power output than their predecessors.

Cornerstone as a company was originally established by two mobile network operators (MNOs), Vodafone Limited (now known as VodafoneThree) and Telefónica UK Limited (now known as VMO2), to deploy and operate a shared single grid network providing 2G, 3G and 4G coverage. However, single grid development is not always possible for sites providing a 5G service. In the vast majority of cases where freestanding ground-based structures and rooftop

installations are currently in place, these are often but not always able to remain shared base station sites where they are capable of achieving ICNIRP certification whilst also accommodating the weight, wind loading, individual operator antenna separations, additional ancillary infrastructure and technological requirements associated with providing multigenerational technology (2G, 4G and 5G) for 2No. separate operators at a single shared location, albeit sometimes via redevelopment of an existing base station.

It must be noted that in December 2021, the UK's MNOs confirmed to the Government (the Department for Digital, Culture, Media & Sport - DCMS) that they will not offer 2G or 3G services beyond 2033. Doing so will free up spectrum for 4G and 5G networks, enabling customers to benefit from better, faster and more reliable services. The 2G and 3G networks rely on older technology and transitioning them to newer 4G and 5G services involves increased operating costs, as well as a less efficient use of spectrum and energy.

It is critical to understand that the historical 4No. UK MNOs all utilise different technology spectrums to provide their mobile service. The spectrums the Operators utilise are allocated by Ofcom, as industry regulators on behalf of UK Government, through licence agreements with each of the individual MNOs. As such, each MNO must utilise the spectrum licenced to them. Each part of the radio frequency spectrum has variations in terms of frequency propagation. Therefore, each individual MNO's network, and their sharing arrangements, cannot be compared directly and there will be variations in how each of these networks is deployed and developed. For this reason, all MNOs, have a completely different network configuration that they need to fit within and build 5G service around. Therefore, the networks must be built differently, involve taller heights to overcome ICNIRP exclusion requirements, with different antennas and equipment, to take account of those spectrum and licence variations. This will in turn lead to necessary infrastructure variations on a cell-to-cell basis, depending on site specific demand, local constraints and requirement. As such, the individual networks will have variations in how their infrastructure is deployed and developed.

Public Benefit

It is undeniable that mobile communication is now a key part of sustainable development and a vital tool in our personal lives and in both business activities and government operations. Indeed, the demand for faster and improved mobile connectivity continues to grow with modern society now expecting to be able to make use of mobile devices to their full potential where people live, work and travel. Each new generation of mobile communications technology has provided us with higher speed, better connection, and many more advanced features on our mobiles, and now with 5G, we can expect to experience an even more extensive range of telecommunication services. There is, therefore, a drive by the Government to ensure that all communities, both urban and rural, have access to the most up to date mobile technology, given the clear sustainability, social and economic benefits for doing so. Indeed, the Government in Westminster has indicated that further reforms will take place to streamline the delivery process for critical infrastructure, which includes telecommunications, as outlined in their 2024-25 agenda via the King's speech on 17 July 2024.

The above is reflected in Chapter 2 'Achieving sustainable development' of the NPPF, which states:

> *"The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs…"*
>
> Paragraph 7, NPPF

The NPPF goes on to define its three interdependent and overarching economic, social and environmental objectives.

Good connectivity allows people to access a wide range of essential services and a further explanation on some of these key benefits is provided below:

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- Economic benefits

  - Creating more productive and cost efficiencies for businesses
  - Businesses offering online services can extend their products to a broader audience
  - Local areas and businesses can benefit from tourists and visitors as hotels, attractions, and restaurants can be booked online from anywhere in the world
  - Business owners and services like doctors can provide a faster and more cost-effective service by offering both online appointments and ordering
  - Digital connectivity facilitates economic growth, something which the Government is keen to progress and promote
  - 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high-definition images and video), increased capacity and heightened security will also facilitate learning on the job procedures, thanks to technologies such as Augmented Reality (AR) goggles, which, for example, can give the likes of engineers real-time instructions on how to fix a machine on a production line.

- Social benefit

  - Mobile communications can help people to stay in touch wherever and whenever, which can help improve social wellbeing
  - Convenient access to online commerce or businesses
  - Contacting emergency services is easier, especially in remote areas
  - Giving the ability to manage our personal finances and information 24/7
  - Using a mobile wherever you go can provide better personal security
  - Having access to social networking sites and applications can keep people entertained with their lifestyles and interests
  - Access to real-time transport information or timetables
  - Smart meter reads for utilities such as gas or electric
  - Contacting local authorities
  - Promotion of smarter and productive ways of working. For example, working from home can help minimise commuting which can provide better work and home life balance

- Sustainability and Environmental benefits

  - Facilitating remote access to services, education, and commerce, reducing the need to travel and in turn minimising carbon emissions.
  - Better monitoring and control of energy consumption through climate change technology, smart metering and smart energy grids.
  - 5G infrastructure requires fewer heat generating electronic components.
  - 5G enabling of the Internet of Things (IOT) sensor deployment can manage and alert us to pollution risks, health hazards and flood risk.
  - Provision of smart technologies within the agricultural sector will facilitate more efficient and less wasteful practices helping to limit negative impacts.
  - 5G networks allow monitoring of traffic flow resulting in less congestion and better air quality. They also make driverless cars possible; a means of transport that offers better fuel efficiency.
  - Smart cities and buildings can rely upon 5G networks to enable buildings and infrastructure to use automated energy saving through better and more efficient lighting, heating, cooling and other operations.

- Health benefits

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- Support the delivery of healthcare provision and accessibility by enabling people greater access to online services, NHS appointment reminders, reminders to take medicines, make appointments etc.
- Patients across the country are now becoming accustomed to using remote healthcare services such as NHS 111, virtual GP appointments, and ordering online deliveries of essential medical supplies.
- 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high-definition images and video), increased capacity and heightened security are going to be fundamental in scaling the patient benefits of remote healthcare and keeping medical records secure and private. For instance, trials have shown that connecting ambulance crews to expert resources using 5G allows paramedics to work with doctors and conduct specialist procedures in real time whilst on the road.

- Education benefits

  - Facilitates access to educational establishment databases or booking systems for securing places for the likes of school dinners, field trips, extra-curricular activities, student/teacher reviews, etc.
  - Provides access to school/college/university apps for setting and submitting homework/coursework, ensuring news and notifications are delivered efficiently, and for parent/student/teacher interactions.
  - The relationship between 5G and education is evolving at a massive rate with educators exploring the relevance of Virtual Reality (VR) technologies for education and training. Crucially, VR can support remote learning, allowing students a presence in the classroom even when working elsewhere.

5. Site Selection Process

Alternative sites considered and not chosen (not generally required for upgrades/alterations to existing sites including redevelopment of an existing site to facilitate an upgrade or sharing with another operator)

A Sequential Approach to Site Selection

With full respect to national and local planning policy preferences, a sequential approach to site selection was adopted, with the following factors having each been considered in order:

- Is there any existing base station within the operator's network that, if redeveloped or upgraded, could address the operational requirement and, if so, would this option represent an appropriate balance between operational and planning considerations?
- Is there any existing base station within another operator's network that, if redeveloped or upgraded, could address the operational requirement and, if so, would this option represent an appropriate balance between operational and planning considerations?
- Are there any opportunities for the deployment of the operator's base station on a rooftop or at another structure and, if so, would this option represent an appropriate balance between operational and planning considerations?
- Is a new ground-based mast the only available option and, if so, would this option represent an appropriate balance between operational and planning considerations?

In seeking to identify a viable option capable of fulfilling the operational brief, the site selection process also has to take account of the following factors:

- Development must take place at a location within the target area / defined search area.
- The base station must have access to a power source and the cost for connection must be within budget. Excessive grid connection costs can render certain base station developments financially unfeasible.
- Reasonable access for construction, maintenance and decommissioning purposes must be achievable

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- The development must be able to facilitate the antennas being able to 'see' the area they are to serve, i.e., the antennas will need to protrude above surrounding clutter to ensure effective signal transmission and avoid infringement.
- The base station development must be able to achieve compliance with ICNIRP Certification requirements.
- The base station development must be able to connect within the wider network via a fibre connection or a transmission dish link that can achieve direct line of sight with other base stations in the network.

Siting and Design Considerations

The reader will appreciate that Cornerstone has several options available for use in their design portfolio. As outlined in **Appendix A**, these range from building-based solutions including stub masts, pole-mounted supports, and wall-mounted antennas. Ground-based masts designs include lattices, monopoles with open antenna headframes or street furniture style masts. At ground level a base station will typically involve equipment cabinets and electricity meter pillars that range in size but will be of similar appearance to those deployed by utility companies. Subject to the site-specific design, i.e. if a mast is 'climbable', and there is available space, then some ancillary development may include a fenced compound for security purposes.

When considering the potential viability of a rooftop site or the use of another structure, one must take account of the following factors:

- Height

  It is imperative that the building or structure is of sufficient height, or can accommodate an antenna support of sufficient height, to allow the antennas to 'see' the area they are to serve without being impeded by clutter. The height which a proposal protrudes above the roof can be implicated by the weight of the installation and its wind loading.

- Type of building/structure

  Not all buildings or other structures will be viable for use and operators have a duty of care to ensure that their equipment is installed safely. For example, attaching apparatus to light weight, wooden rafters and joists is simply not an option, as these are just not strong enough to support the weight of modern communications apparatus. Mounting equipment upon walls or gable ends also requires sufficient bracing to account for wind loading and stability requirements, requiring bolts through the entire wall and fastened internally via a number of back plates. This would have legal implications and would be intrusive for the occupants, both during construction and maintenance with the backplates requiring to be checked at least once a year on routine maintenance visits. Also, telecommunications equipment cannot be supported on sloping roofs due to the simple laws of physics and the fact that such roof types offer nothing for the equipment to attach to. As such the equipment would slide off under its own weight taking any roof surface with it.

- Equipment weight and structural soundness

  One must consider the structural integrity of the building and the support structure in terms of the weight of the proposed antennas and the associated wind loading requirements. Each modern antenna weighs approximately 50kg and would need to be supported by 3No. Remote Radio Units, each of which weighs approximately 30-35kg, i.e., 12No. antennas and 36No. RRUs for a shared rooftop site would weigh in the region of 1.6 tonnes minimum excluding any support structures, steelwork or feeder cabling. On this basis the transmission equipment for a single operator site requiring 6No. antennas and 18No. RRUs would weigh in the region of 0.8 tonnes minimum.

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Also, consideration needs to be given to the support structure and steelwork required to accommodate the antennas at the required heights, be it a wall-mounted bracket, a wall-mounted support pole, a pole-mounted antenna scheme deployed upon streel grillage for stability or a stub mast. Please note that a 10m stub mast with headframe including the supporting steel grillage (excluding antennas, RRUs and feeder cables), weighs approximately 4.3 tonnes. Without the headframe the weight would be circa 2 tonnes (excluding antennas, RRUs and feeder cables).

Other weights that need to be accounted for include any cabinetry and the steel grillage upon which these elements must be set, the feeder cables that link the antennas to the cabinetry, and any handrailing required for health and safety purposes.

Undertaking significant structural alterations or modifications to buildings to make them capable of accommodating such weights is not reasonable or realistic. Therefore, if a building fails a structural survey, then the building is not suitable for use. In certain cases, it is obvious that the structural integrity of a building is an issue without the need for a detailed survey, as they were simply not built or designed to accommodate telecommunication infrastructure development of the form and weight required. In addition, standard 2-3 storey buildings are not tall enough for multigenerational technologies to be accommodated at heights that will meet ICNIRP certification and avoid signal infringement, (5G being more prone to signal attenuation), by surrounding clutter, as the supporting structures would need to be taller than the host building itself, which would put undue stress on the building, especially when wind loading is taken into account. Lastly, from an aesthetical point of view, it is important that rooftop telecommunications development is proportional to the scale of the host building as deploying a support structure that far exceeds the height of the host building would look extremely out of place and prominent.

- General Health and Safety

  The site in question must be capable of accommodating ancillary development required for health and safety of those that will be maintaining the site, i.e., the use of handrailing or latch systems, hooped ladders and resting platforms.

- ICNIRP

  To achieve ICNIRP compliance the operator must be certain that access to the antennas, be they on a rooftop or ground-based structure, is restricted to authorised personnel only. They must also consider if the available antenna locations will ensure ICNIRP compliance with neighbouring buildings, other operator's antennas present nearby, and any accessible areas at height. In this regard horizontal and vertical separation is essential for those that might be maintaining neighbouring lighting columns, trees and windows so that they do not unknowingly encroach upon the exclusion zones around the live antennas.

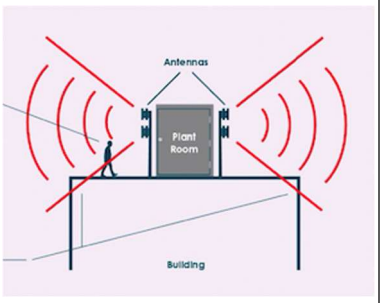
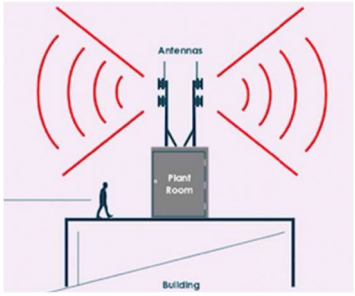
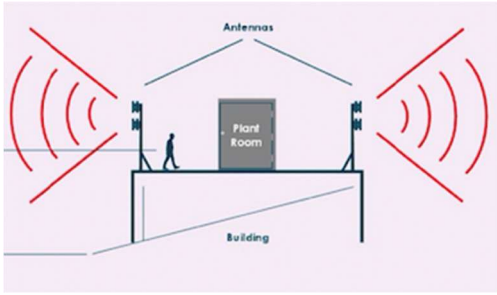
- Signal Clipping

  Clipping occurs when the expanse of a rooftop itself and or corner sections reflects the signal transmitted by the antennas. To avoid this, antennas either need to be positioned close to the edge of the roof or at a greater height in a central location to allow for the angle of signal propagation to clear the immediate rooftop obstacle. Please refer below to 'Scenario 1' taken from the Code of Practice for Wireless Network Development in England - Annex C – Rooftop Developments.

Fig. 4: Signal Clipping and Exclusion Zones

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Scenario 1: Not viable	Scenario 2: Viable	Scenario 3: Viable
		
Antennas propagating across the rooftop make it inaccessible due to the ICNIRP exclusion zone. Signal clipping is also occurring.	The antenna height means the person is not within the ICNIRP exclusion zone and signal clipping is not occurring.	The antennas propagate outwards and those accessing the rooftop are not within the ICNIRP exclusion zone. Signal clipping is not occurring.

When considering potential development options for new ground-based masts, there are several non-planning based general considerations that must be taken into account, namely:

- Underground utilities and services

  The presence of underground services is commonplace, especially at roadside and adopted highway's locations. Underground services can limit the usable space, preventing necessary mast foundations from being achieved, rendering developments unviable. It is not possible to build on top of underground services. Whilst it may sometimes be possible to undertake diversions of existing services to facilitate development, subject to available route/space, one must appreciate that such works come at a cost and to do so can render the base station development financially unfeasible. Not all underground services can be diverted, and their presence influences the viable position of a base station given the retained clearances and easements that utility companies still require in order to access and maintain them.

- Overhead utilities and services

  The presence of overhead services can be problematic, not just for the construction of ground-based masts, but also for their operation, as operators must ensure that ICNIRP guidelines are adhered to and that those maintaining such infrastructure at height do not encroach upon the exclusion zones around the proposed antennas. Again, whilst it may sometimes be possible to undertake diversions of existing services to facilitate telecoms development, subject to available route/space, one must appreciate that such works implicate on the utility company and the services they provide to their customers, hence this comes at a cost and to do so can render the base station development financially unfeasible. Not all overhead services can be diverted.

- Presence of trees

  Developments must seek to minimise the risk of conflict with the root protection areas and overhanging canopies of mature trees to limit impact upon the health of the tree(s) in question. This matter becomes more sensitive when dealing with protected trees such as those in Conservation Areas or that are subject to Tree Preservation Orders. One must also appreciate that whilst trees can provide

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useful screening for ground-based masts, the antennas must be of sufficient height above the trees to provide effective coverage to the target coverage area and to ensure that signal transmission is not impeded. Especially when trees are in leaf and when wet, it impacts on the propagation of the signal as the tree foliage will absorb the radio frequency meaning the signal is broken or lost, hence the need for height and the full length of the antennas to clear the immediate natural clutter.

When considering potential development options upon adopted highways land, or at roadside or pavement locations, there are several other general considerations that must be taken into account, namely:

- Existing street furniture

  The presence of other street furniture elements, such as streetlights, telegraph poles, cabinetry, signage and other street furniture elements, can limit the usable space in / on adopted verges or footways and/or create an unacceptable level of clutter. The presence of such elements can often restrict new street furniture base station development to locations that may impact pedestrian flow or impede highways safety requirements, both of which must be avoided for the development to be viable. The presence of vertical street furniture elements like telegraph poles and streetlights can be problematic as operators must ensure that ICNIRP guidelines are adhered to and that those maintaining such infrastructure do not encroach upon the exclusion zones around the proposed antennas.

- Points of access/egress to private properties

  In built up areas, both public and private properties will often benefit from off-street parking, driveways, entrance and exits points and pedestrian routes in and out of the building. It is important that the development of street furniture base stations in roadside locations next to these types of arrangements does not compromise pedestrian and vehicle movements, access arrangements to properties nor impact on highway safety.

- Highways and pedestrian safety requirements

  When nominating a site for street furniture base station development, it is imperative that the infrastructure does not infringe upon visibility splays and meets the requirements of the Department for Transport's 'Inclusive Mobility' guidance document, for safe passage of pedestrians, including those using pushchairs and wheelchairs, see below for details. It is also important that the speed limit of the road is taken into account as this can sometimes mean a requirement for the installation traffic barriers for road safety purposes.

- Design limitations of street furniture masts

  Street furniture mast are the slimmest structures available for use in operators' design portfolio and tend to be used in roadside locations and in more sensitive settings such as suburban or residential areas.

  Street furniture masts can only accommodate 3No. sector antennas at any one height and these must be set at 120° separations due to being positioned in a rigid, back-to-back formation. This prevents operators from being able to orientate or tilt antennas to direct their signal to the specific areas. Street furniture mast solutions are therefore much more limited in terms of operational potential when compared with the likes of a rooftop solution, or a monopole with an open headframe or lattice structure, all of which can provide bespoke antenna layouts.

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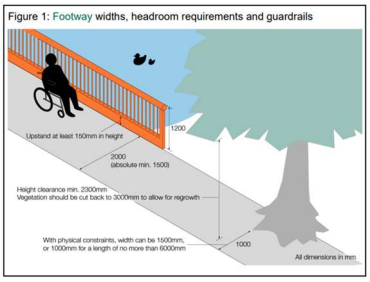
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Due to the multigenerational and modern nature of the technologies involved, the operators' design portfolio no longer includes a 'camouflaged' street furniture design option, (for example, as a timber effect 'telegraph pole' solution, as was available in earlier generations of technology). This is because modern antennas are simply too big and heavy to be contained in a disguised solution. In addition, enclosing antennas within GRP shrouding has a negative upon signal transmission of modern antennas, i.e., 5G signal is more prone to attenuation and therefore requires a higher position than earlier antenna generations to ensure the same degree of coverage is achieved.

In terms of the mast width, street furniture masts incorporate the minimum girth necessary to ensure the structural viability of supporting the transmission equipment and housing the associated feeder cables that run through the body of the monopole to connect these elements to the cabinetry. Please note that 4G and 5G antennas and their feeder cables are much thicker and heavier than their counterparts in earlier generations of base station development, as they carry more data. This larger equipment simply cannot be safely supported by or fit into a slimmer mast design.

When taking into account all these influential factors, the applicant has carried out a sequential approach to site selection in which, as set out below, has robustly demonstrated that there are no potential alternative suitable sites available within the search area for the proposed new telecommunications equipment.

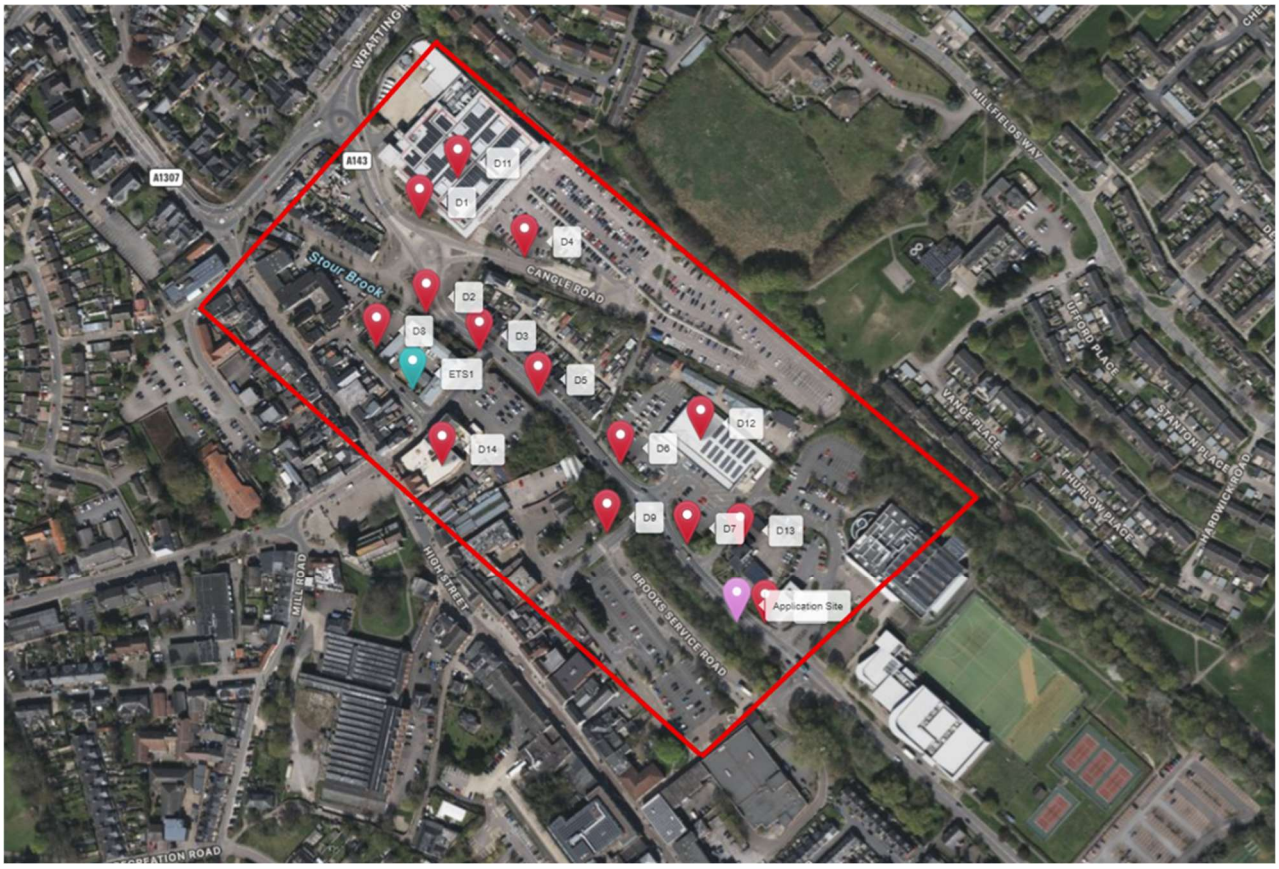
Fig. 4: Footway widths etc. 'Inclusive Mobility: A Guide to Best Practice'



Guide to Best Practice Figure 1

*"Footways and footpaths should be made as wide as is practicable, but under normal circumstances, a width of **2000mm** is the minimum that should be provided, as this allows enough space for two wheelchair users to pass, even if they are using larger electric mobility scooters. If this is not feasible due to physical constraints, then a minimum width of **1500mm** could be regarded as the minimum acceptable under most circumstances, as this should enable a wheelchair user and a walker to pass each other. Where there is an obstacle, such as lamp columns, sign posts or electric vehicle charging points, the absolute minimum width should be **1000mm**, but the maximum length of such a restricted space should be **6 metres**.*

Fig. 5: Search Area and Discounted Site Map



https://gridreferencefinder.com?gr=TL6717445733|D1|1,TL6718045672|D2|1,TL6721645648|D3|1,TL6724345710|D4|1,TL6725545621|D5|1,TL6731045578|D6|1,TL6735545527|D7|1,TL6714945649|D8|1,TL6730345533|D9|1,TL6740845477|D10|1,TL6719845760|D11|1,TL6736245596|D12|1,TL6739045527|D13|1,TL6719445573|D14|1,TL6717345622|ETS1|8,TL6738945478|Application_s_Site|9&v=r&labels=1

Site Type	Site Address	National Grid Reference	Reason for Discounting
ETS1 – Existing telecoms site	Airwave Site at Haverhill Police Station, Swan Lane, Haverhill, CB9 9EQ	E: 567173 N: 245622	This is the existing third party operator installation, owned/hosted by Airwave, which VMO2 currently rent space off to provide coverage to the surrounding area. The existing structure is not tall enough to host equipment capable of providing the latest 5G technologies to the surrounding area. As the structure does not belong to VMO2 they are unable to

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			upgrade it. In addition, there are issues with accessing the site for maintenance due to its location within a police station. As such, this option has been discounted and VMO2 are seeking to install their own site in the nearby vicinity.
D1 - Streetworks	A143, Haverhill, West Suffolk, CB9 0BQ	E:567174 N:245733	An installation at this location would not deliver the required level of coverage to the target area.
D2 - Streetworks	Lord's Croft Lane, Haverhill, West Suffolk, CB9 8AG	E:567180 N:245672	Due to the proximity to the retaining wall there is no design available to support the operator's apparatus and provide the necessary coverage to the target coverage area.
D3 - Streetworks	Swan Lane, Haverhill, West Suffolk, CB9 9DY	E:567216 N:245648	Due to the proximity to the brook there is no design available to support the operator's apparatus and provide the necessary coverage to the target coverage area.
D4 - Streetworks	Swan Lane, Haverhill, West Suffolk, CB9 9DY	E:567243 N:245710	The footway at this location is too narrow to accommodate the operator's equipment. As such, it would lead to highway safety issues. A site in this location has therefore been discounted for this reason.
D5 - Streetworks	Lord's Croft Lane, Haverhill, West Suffolk, CB9 8AG	E:567255 N:245621	The footway at this location is too narrow to accommodate the operator's equipment. As such, it would lead to highway safety issues. A site in this location has therefore been discounted for this reason.
D6 - Streetworks	Lord's Croft Lane, Haverhill, West Suffolk, CB9 8AG	E:567310 N:245578	The footway at this location is too narrow to accommodate the operator's equipment. As such, it would lead to highway safety issues. A site in this location has therefore been discounted for this reason.
D7 - Streetworks	Lord's Croft Lane, Haverhill, West Suffolk, CB9 0ER	E:567355 N:245527	The footway at this location is too narrow to accommodate the operator's equipment. As such, it would lead to highway safety issues. A site in this location has therefore been discounted for this reason.
D8 - Greenfield	Murton Slade, Haverhill, West Suffolk, CB9 9DY	E:567149 N:245649	Due to the proximity of an existing installation there is no design available to support the operator's apparatus and provide the necessary coverage to the target coverage area.
D9 - Streetworks	Brook Service Road, Haverhill, West Suffolk, CB9 8AG	E:567303 N:245533	The footway at this location is too narrow to accommodate the operator's equipment. As such, it would lead to highway safety issues. A site in this location has therefore been discounted for this reason.
D10 - Streetworks	KFC, 5, Ehringshausen Way, Haverhill, West Suffolk, CB9 0ER	E:567408 N:245477	The footway at this location is too narrow to accommodate the operator's equipment. As such, it would lead to highway safety issues. A site in this location has therefore been discounted for this reason.

D11 - Rooftop	Tesco, Cangle Road, Haverhill, West Suffolk, CB9 0BQ	E:567198 N:245760	Due to the construction of the building there is no design available to support the operator's apparatus and provide the necessary coverage to the target coverage area.
D12 - Rooftop	ALDI, Lordscroft Lane, Haverhill, West Suffolk, CB9 0ER	E:567362 N:245596	Due to the construction of the building there is no design available to support the operator's apparatus and provide the necessary coverage to the target coverage area.
D13 - Rooftop	Reeds Lane, Haverhill, West Suffolk, CB9 0ER	E:567390 N:245527	The rooftop is too low in order to deliver the required level of coverage to the target coverage area. This site has therefore been discounted for this reason.
D14 - Rooftop	Swan Lane, Haverhill, West Suffolk, CB9 9DY	E:567194 N:245573	The rooftop is too low in order to deliver the required level of coverage to the target coverage area. This site has therefore been discounted for this reason.

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

Government Ambition and Legislative Reforms

It is important to consider this proposal in a wider context of National and Local Government ambition which clearly recognises the benefits that modern communications networks bring.

National

- **UK Government Resilience Action Plan, published July 2025**[9]

This publication includes reference to telecommunications as part of the Government's 'Critical Network Infrastructure' (CNI) stating that:

> *"The resilience of the UK's CNI is of central importance to ensuring that the essential services the public rely on continue to operate. Given the fundamental and connected nature of these services, failure has the potential to cause cascading and catastrophic consequences. This could be, for example, power outages impacting other essential functions, like transport or water provision, or a failure in the telecoms or data infrastructure sectors impacting the energy sector - across all four nations."*
>
> Paragraph 57

It also confirms that:

> *"…Telecoms is part of our CNI and underpins many, if not all, economic sectors…"*

- **UK Infrastructure: A 10 Year Strategy**[10]

[9] https://www.gov.uk/government/publications/uk-government-resilience-action-plan
[10] https://www.gov.uk/government/publications/uk-infrastructure-a-10-year-strategy

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Published in June 2025, and Presented to Parliament by the Chief Secretary to the Treasury by Command of His Majesty, the Strategy highlights the benefits of effective digital technologies in 'Chapter 3: Unlocking growth across regions' under the subheading 'Digital infrastructure for growth and innovation':

> *"Digital infrastructure supports productivity growth through lowering costs for firms, underpinning technological change, widening access to labour markets across the country and enabling new and innovative services to be provided.*
>
> *Digital infrastructure also increasingly underpins the provision of services critical for the functioning of society, business, and government – including the operation of other infrastructure sectors. In particular, demand for data centre services is projected to surge over the next decade including for AI development and deployment. The government is committed to facilitating the development and expansion of cutting-edge, secure, and sustainable digital infrastructure that meets the needs of both the private and public sectors."*

- **Labour Manifesto**[11]

The Manifesto included a section entitled 'Kickstart economic growth' within which the subsection 'Economic Infrastructure' referenced their views on modern communications as follows:

> *"In an ever more connected world, Britain's communication network is also vital. Under the Conservatives, investment in 5G is falling behind other countries and the rollout of gigabit broadband has been slow. Labour will make a renewed push to fulfil the ambition of full gigabit and national 5G coverage by 2030.*

- **UK Wireless Infrastructure Strategy**[12]

The Strategy recognises the benefits that effective connectivity has brought to British households and business by boosting growth, productivity, and opportunity for all. Advanced wireless connectivity is heralded as the foundation on which to build industry, employment, skills and services for the future with 5G identified as being key to driving industry growth and improving public services and transport. Improving digital connectivity is also one of the government's Levelling Up Missions and aims for all places and communities across the UK to share in the benefits of good connectivity, enriching lives and driving local growth.

The document references the Prime Minister's 5 priorities for this government, i.e., to build a better, more secure, more prosperous future for the UK, including growing the economy, and creating better-paid jobs and opportunity right across the country, which this strategy is focused on delivering.

Chapter 5 of the Strategy deals specifically with 'Realising the benefits of 5G and advanced wireless connectivity' and states:

> *"5G and other forms of advanced wireless connectivity pave the way for new services and applications that can have a transformative effect on our public services, businesses and our local economies, delivering this government's priority of growing the economy and creating better paid jobs. Wireless connectivity can support mobile healthcare workers and connected vehicles, improve traffic flow through our cities and enable our factories to be more productive, supporting the fourth industrial revolution. Our evidence is clear that the most significant economic benefits from 5G will come from widespread adoption of advanced 5G by industrial sectors, including manufacturing and logistics, and by public services.*

[11] https://labour.org.uk/updates/stories/labour-manifesto-2024-sign-up/
[12] https://www.gov.uk/government/publications/uk-wireless-infrastructure-strategy/uk-wireless-infrastructure-strategy

The government is determined that the UK should take full advantage of these opportunities…

We are therefore providing the framework to ensure that people, businesses and public services across the UK are able realise the full benefits of 5G and advanced wireless connectivity as soon as possible."

With regards to facilitating better connectivity at a local and regional level, Chapter 5 references the need for 'Local Leadership and Coordination' stating:

"Local leadership can help to identify and break down barriers to deployment at a local level by bringing together stakeholders across the public sector and building strong relationships with industry. The installation of telecoms infrastructure involves a number of different local government departments (such as planning, estates, highways) and their activities can be siloed and uncoordinated.

It is essential that, at a leadership level, local and regional authorities recognise the importance of wireless connectivity and identify decision-makers within the organisation who are empowered to facilitate private sector investment. By articulating the benefits of wireless infrastructure and connectivity and linking these to digital inclusion (and, in turn, tying these into local authorities' wider regeneration and growth or 'place' strategies) it can be viewed as an inward investment opportunity for places across the UK."

- **Ofcom Connected Nations Report 2025[13]**

The annual Connected Nations report measures progress on the availability of broadband and mobile services across the UK, including the newest full fibre, fixed wireless access and 5G networks now being rolled out.

The Report's section entitled 'Overview' confirms the following in relation to 5G coverage and data use:

- Mobile coverage continues to increase, with UK 5G coverage outside of premises from at least one operator now ranging between 94% and 97%...
- Mobile data use continues to rise, increasing by 18% over the past year...
- 5G traffic saw the largest growth…
- 4G remains the dominant mobile technology…

The Report's section entitled 'Mobile, data and voice' confirms that mobile connectivity plays a vital role in how people across the UK access services, communicate and stay connected and states the following under the subheading 'Highlights':

- ***"5G Standalone (5G SA)** is now available across 83% of areas outside of premises in the UK, based on our High Confidence levels. This newer form of 5G is being rolled out alongside existing 5G non-standalone (5G NSA) services.*

- ***Overall 5G coverage, which includes both 5G SA and 5G NSA, continues to expand.** 5G coverage outside of premises from at least one MNO now ranges between 94% and 97%, based on our Very High and High Confidence levels. Individual MNOs report 5G coverage outside of premises of between 64% and 89%, at our High Confidence level.*

- ***4G coverage from at least one MNO now reaches 96% of the UK geographic landmass and extends beyond 99% of UK premises.** 4G continues to carry the largest share of mobile data traffic, accounting for 72% of the total monthly mobile data traffic. While it remains the most used mobile*

[13] https://www.ofcom.org.uk/phones-and-broadband/coverage-and-speeds/connected-nations-20252

technology, its share is gradually declining, down by 6 percentage points from 2024, indicating a shift towards 5G.

- ***Monthly mobile data traffic increased by 18% over the past year to 1,257 petabytes (PB)**, a growth rate broadly consistent with the previous year.*
- ***5G traffic saw the largest growth, rising from 227 PB to 348 PB, an increase of 53%.** Notably, 5G SA now accounts for approximately 31% of total 5G traffic, representing around 9% of overall mobile data traffic. This reflects a widespread transition by MNOs from NSA to SA networks.*
- ***The transition away from older mobile technologies continues.** We expect all MNOs will have completed their 3G switch-off by the end of the year. All MNOs have committed to retiring their 2G networks by 2033 at the latest.*
- ***The number of direct customers relying on 2G or 3G-only devices is approximately 2 million**, broadly similar to the 2.1 million reported in 2024."*

- **UK Digital Strategy Policy Paper[14]**

The UK Government's Policy Paper was updated on 04 October 2022, within which 'Section 1 Digital Foundations' reiterates that digital infrastructure plays a vital role in the daily lives of modern society and is the foundation of a thriving digital economy. The Strategy confirms that every part of the UK needs world-class, secure digital infrastructure that enables people to access the connectivity and services they need, where they live, work or travel, and clearly states the ambition to supply the majority of the UK's population with access to 5G by 2027. The Strategy also highlights the fact that enhancing digital connectivity is 'Mission 4' of the Government's Levelling Up White Paper[15].

- **The Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2022[16]**

The reader will be aware that amended planning legislation was introduced on 04 April 2022 in the form of the above, which saw a relaxing of planning laws to facilitate Government ambition for all to have access to effective and UpToDate mobile communications services in recognition for the benefits that modern communications networks bring.

The 'Explanatory Memorandum' that accompanied this amendment confirms that:

"Permitted development rights have an important role to play in the planning system. They provide a more streamlined planning process with greater planning certainty, while at the same time allowing the local consideration of key planning matters through a light-touch prior approval process.
Policy Background, What is being done and why? Paragraph 7.1

It is essential that the planning system continues to effectively support the deployment of new mobile network infrastructure. The changes will provide Code Operators with flexibility to upgrade existing sites in England for 5G delivery, enhance coverage and meet growing demands for network capacity. They will also reduce the time, cost and uncertainty involved in upgrading mobile network infrastructure and encourage the use of existing infrastructure and promote site sharing to reduce the impacts of new deployment.

[14] https://www.gov.uk/government/publications/uks-digital-strategy/uk-digital-strategy
[15] https://www.gov.uk/government/publications/levelling-up-the-united-kingdom
[16] https://www.legislation.gov.uk/uksi/2022/278/contents/made

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Policy Background, What is being done and why? Paragraph 7.3

> *Article 3(2)(a) of this Order alters the height limits for the deployment of new ground-based masts through permitted development rights. These changes permit the installation of new ground-based masts of up to 30 metres in height on unprotected land, and up to 25 metres on Article 2(3) land.[17] In both cases Code Operators would need prior approval from the local planning authority. These changes will reduce the number of new ground-based masts needed and will particularly support deployment of the Shared Rural Network, a programme to increase mobile network coverage throughout the UK.*
>
> New ground-based masts, Paragraph 7.16

- **Future Telecoms Infrastructure Review (FITR)[18]**

In 2018, the Department for Digital, Culture, Media and Sport published the FITR, outlining the Government's intent on being the best place to start and grow digital business with the aim of providing the majority of the population with 5G coverage by 2027. The FITR made it clear that 5G networks will deliver faster and better mobile broadband data services to consumers and businesses and will enable innovative new services for industry sectors, including manufacturing, transport, immersive technologies and healthcare.

- **The Electronic Communications Code 2017[19]**

Government ambition and recognition for the benefits that modern communications networks bring is also clearly evident in the publication of this document which has made it easier for network operators to install and maintain apparatus, such as phone masts, exchanges and cabinets, on public and private land with Part 4, Paragraph 20, providing a mechanism for the courts to impose terms of occupation on a landowner and the Operator or infrastructure provider. Further amendments to this Code are imminent, to help streamline the acquisition process and clarify relationships between infrastructure providers and site owners.

Local Planning Policy and Guidance

West Suffolk Local Plan 2024–2041 (July 2025)

The West Suffolk Local Plan sets out the strategic objectives, strategic and local policies, and site allocations which guide growth and development within the district to 2041. The Plan recognises the importance of digital connectivity in supporting the local economy and ensuring that communities have access to the infrastructure necessary to meet their needs.

The following objectives and policies are considered relevant to telecommunications development.

Strategic Objectives

Under the heading 'Business and the local economy', Strategic Objective SO3 seeks to:

"Support the local economy of West Suffolk by ensuring an appropriate supply of land is available to accommodate a range of businesses and start-ups as well as allowing existing businesses to continue to operate and grow."

This is complemented by Strategic Objective SO4, which specifically recognises the importance of digital connectivity and states:

[17] Please note that A1(1)(c) of the GPDO also limits the height of new ground based masts on highways land to 25m
[18] https://www.gov.uk/government/publications/future-telecoms-infrastructure-review
[19] https://www.ofcom.org.uk/phones-telecoms-and-internet/information-for-industry/policy/electronic-comm-code

"Ensure adequate infrastructure is provided to support new growth to ensure communities are both physically and digitally well connected."

The provision and improvement of telecommunications infrastructure therefore forms part of the Plan's wider aspirations to support economic growth and connected communities. These objectives are balanced with the need to respect the district's environment. Strategic Objective SO13 seeks to:

"Conserve, enhance and protect the character, quality and appearance of the natural and historic environment and distinct landscapes."

SP31 – Infrastructure

Chapter 4.8 of the Plan addresses infrastructure provision. Paragraph 4.8.1 expressly identifies telecommunications and broadband as forms of 'hard infrastructure', alongside infrastructure such as energy and water supplies and pedestrian and cycle routes.

The importance of infrastructure to the functioning of communities is recognised at paragraph 4.8.2, which states:

"The delivery of resilient infrastructure is important to create community safety and cohesion, connected communities and determine how places are shaped and how quality of life in existing communities can be maintained and improved."

Policy SP31 seeks to ensure that infrastructure and facilities are delivered at the appropriate time to support development and planned growth. It states, inter alia:

"It is important that the infrastructure and facilities needed to support new development and planned growth is delivered alongside development at the appropriate time, and for existing infrastructure to be protected and enhanced for the future."

The policy also requires development proposals to retain, enhance and provide additional infrastructure, as appropriate to their scale and location, to mitigate the direct and cumulative impacts of development. The Plan therefore recognises both the importance of providing new infrastructure and the need to protect and improve existing provision to meet future requirements.

LP45 – Digital Infrastructure

The Plan includes a specific policy addressing digital infrastructure and telecommunications development. Policy LP45 establishes support for improvements to the district's digital communications network, stating:

"The improvement of the digital communications network in the district, including through the provision of mobile data networks and digital technology upgrades, will be supported, subject to compliance with relevant policies in this plan and national policy."

The policy also requires new residential, public and business premises to include gigabit-capable connections or to be constructed to be high-speed ready. This demonstrates the importance attached to ensuring that development is supported by suitable digital infrastructure.

In respect of telecommunications development, Policy LP45 states:

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"Telecommunications development shall be permitted in accordance with other policies within the development plan where it is demonstrated as appropriate:"

The policy then sets out the following criteria:

a. The selection of the location has applied the following order of preference:

- Sharing existing telecommunications sites and installations, including masts, structures and buildings.
- Using existing buildings and structures where there are no existing telecommunications installations.
- Other locations.

b. Street clutter is minimised including the number, size, and prominence of equipment cabins.

c. The impacts on the surrounding area's visual amenity, character, and appearance through appropriate design and/or mitigation measures is demonstrated.

d. Where on a building, the location and design does not have a detrimental impact to that building's appearance.

e. The proposal has special regard to the natural and historic environment where the quality of the landscape or townscape may be particularly sensitive to the intrusion of communications infrastructure.

f. No detrimental impact is caused on the movement of pedestrians and cyclists or on the safe and effective functioning of highways or cause severe harm to the highway.

g. There is no interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.

The policy therefore provides a framework which supports telecommunications development while requiring consideration of alternative siting opportunities, the scale and prominence of equipment, visual effects, environmental sensitivities, highway safety and potential interference. It places a preference on making use of existing telecommunications sites, buildings and structures before considering other locations.

Economic and Social Benefits of Improved Communications

The supporting text to Policy LP45 expressly recognises the economic and social benefits associated with reliable communications infrastructure. Paragraph 4.8.37 states:

"Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. The introduction of new technology, in particular superfast broadband services, will allow more mobile and homeworking and the creation of small start-up businesses thereby reducing the need to travel."

The same paragraph recognises the contribution that improved connectivity can make to residents' wellbeing, stating:

"Further, improved communications infrastructure helps to improve the social well-being of residents and reduce loneliness, particularly for the elderly population."

The Plan also identifies inadequate connectivity as a barrier to economic development:

"Slow broadband and inadequate and slow mobile phone coverage are constraints to economic development. Extending the reach of fibre broadband is key for the viability of rural businesses and will also benefit rural residents."

These statements establish the importance of continued investment in digital communications infrastructure. In particular, the Plan recognises that inadequate mobile coverage can constrain economic development, while improved connectivity supports business activity, flexible working and social wellbeing.

SP4 – Design

Policy SP4 requires proposals for new development to contribute to a high-quality, safe and sustainable environment, with its principles applied as appropriate to the scale and type of development proposed.

The policy requires consideration of local character and context, including the relationship between new development and its immediate surroundings. It also requires proposals to have regard to:

"Density, street layouts, scale, height and massing and the relationship of built form to landscape."

Other relevant principles include respecting the historic environment, protecting landscape settings and features of ecological interest, and ensuring that the amenity of residents and users is protected or enhanced.

For telecommunications development, these principles are relevant to the assessment of the installation's siting, height, scale and appearance, and its relationship with surrounding buildings, streets and landscape features. They complement the more specific requirements of Policy LP45.

LP9 – Well-designed Places

Policy LP9 provides further guidance on responding to local context. It states:

"All proposals for development should maintain or create a sense of place and have regard to local context, by as appropriate:"

The policy includes the following requirement:

"Basing design on an analysis of existing buildings, landscape or topography, and fully exploiting the opportunities that these present, and where necessary, prepare a landscape or townscape character appraisal or heritage impact assessment to demonstrate this."

The supporting text at paragraph 4.1.74 explains that high-quality design should respond appropriately to its surroundings and consider how buildings and spaces interact and function. The policy is therefore relevant to the consideration of existing built form, vegetation and topography when assessing the siting and appearance of telecommunications equipment.

SP7 – Landscape

Policy SP7 requires development proposals to be informed by, and sympathetic to, the character of the landscape as described in the relevant landscape character assessments. It states:

"Development proposals should, take into account and avoid detrimental effects on key landscape features and their legibility, local distinctiveness, visual amenity, key views, tranquillity and the nocturnal character of the landscape."

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Where a proposal is likely to have a significant effect on landscape character and visual amenity, the policy requires an understanding of the landscape's context, characteristics and significance, together with the effects of the development, including cumulative impacts.

The policy seeks to avoid negative effects where possible, including through alternative site selection. Where avoidance is not possible, effects should be minimised through design and suitable mitigation measures. Individual proposals are assessed according to their specific landscape and visual impacts, taking account of mitigation and future management proposals.

Taken together, the above objectives and policies establish support for improved telecommunications and digital connectivity within West Suffolk, recognising their contribution to economic growth and social wellbeing. This support is subject to appropriate siting and design, with consideration given to local character, visual amenity, the natural and historic environment, highway safety and the use of existing sites and structures.

Other

- **Times Article, Prime Minister Comments**

On 05 December 2024, the Prime Minister, Sir Keir Starmer, was quoted in an article in The Times, confirming that housing needs to be supported by good infrastructure, stating:

> *"Every road, pylon and mast – which connect people with opportunity – must jump through endless hoops, only to be opposed, dragged out, before eventually, if lucky, approved…"*

- **Department for Science, Innovation & Technology's Minister of State letter to Council Leaders**

On 29 November 2024, the Minister of State, Chris Bryant MP, wrote a letter to Council Leaders, urging support for digital infrastructure deployment and collaboration with mobile network operators, stating:

> *"The Government is committed to supporting the delivery of next-generation connectivity to communities across the UK by driving towards nationwide gigabit broadband and 5G coverage by 2030.*
>
> *We need your help to achieve these goals. Broadband and mobile rollout rely heavily on local authorities prioritising digital infrastructure and placing it at the heart of their wider Place strategy. I am writing to you today to highlight a number of areas that remain a challenge, and how they can be approached to boost telecoms investment in your area."*

Summary

Each of the above demonstrates the governmental recognition of the increasing importance of reliable connectivity now and in the future and they set the scene in which Decision Makers must determine telecommunications applications, particularly in areas where coverage and capacity issues are being experienced, as is the case in this instance.

It is also clear from the above that the preceding and current UK Governments have both placed an onus on Planning system reform to drive the economy with the 2022 revision to the GPDO having relaxed planning laws and increased permitted development rights in favour of the roll out of digital infrastructure, helping to facilitate access to effective communications networks for all.

The August 2026 revision to the NPPF reinforces support for digital infrastructure within Chapter 9, 'Supporting high quality communications'. Policy CO1 requires substantial weight to be given to the benefits of maintaining or improving network coverage, capacity, reliability and resilience, including through next-generation technologies such as standalone 5G.

Alongside this national policy support, the Government's 10 Year Infrastructure Strategy committed to a call for evidence on planning reforms to accelerate the delivery of digital infrastructure. This was launched on 18 December 2025 under the title 'Reforming planning rules to accelerate deployment of digital infrastructure'. The call for evidence sought views from stakeholders to inform whether, and how, specific planning rules and supporting policy guidance should be reformed to enable quicker, lower-cost deployment of fixed and mobile networks. Its purpose was to support improved nationwide coverage and enable communities and businesses across the country to benefit from enhanced connectivity.

The call for evidence recognises the importance of high-quality digital infrastructure to the UK's growth, productivity and the resilience of public services. Reliable fixed and mobile connectivity supports innovation, the adoption of emerging technologies and participation in modern life. As data consumption and demand for digital services increase, continued investment in telecommunications infrastructure is necessary to meet the changing needs of communities and businesses. The delivery of gigabit-capable broadband and modern 5G networks therefore forms an important part of the Government's wider ambitions to improve connectivity and support economic growth.
In addition, the 2025 Resilience Action Plan then also adds further weight to the argument by reiterating that telecommunications are 'Critical National Infrastructure' that is integral to many, if not all, economic sectors. These governmental aspirations are undeniable.

Planning Policy and Other Material Planning Considerations

When considering the appropriateness of the proposal, it is imperative that decision maker give material weight to telecommunications specific policy where it exists. If it does not exist at a local level, or if the policy is out of date, then the NPPF must prevail. One must also appreciate that it is extremely unreasonable to expect niche infrastructural development, such as that proposed development, to strictly adhere to more general policy criteria. Furthermore, it is a material consideration to recognise the planning application type as the proposal benefits from permitted development subject to a prior approval determination.

Prior Approval Mechanism

The Prior Approval system has been long since used to facilitate telecommunications development, in which in more recent times the UK Government have introduced the Prior Approval process as part of its broader planning reforms to streamline working practices, reduce bureaucracy, and encourage growth, especially in housing and renewable sectors. Therefore, it must be remembered in this case that the principle of development has already been established by National Government when the current permitted development rights contained within Part 16 of the Order which were last updated and came into force in April 2022. This statutory legislation necessitates that when a telecoms proposal falls with the limits of PDRs, it results in the requirement for a prior approval application and an assessment by the determining body relating to matters of siting and appearance only.

A prior approval is not like a planning application and The Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government have published updated guidance on the matter in July 2023, entitled 'When is permission required?'[20]

Under the sub-heading 'Is a prior approval application like a planning application?', the guidance states:

[20] https://www.gov.uk/guidance/when-is-permission-required

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"The statutory requirements relating to prior approval are much less prescriptive than those relating to planning applications. This is deliberate, as prior approval is a light-touch process which applies where the principle of the development has already been established. Where no specific procedure is provided in the General Permitted Development Order, local planning authorities have discretion as to what processes they put in place. It is important that a local planning authority does not impose unnecessarily onerous requirements on developers, and does not seek to replicate the planning application system."

Paragraph: 028 Reference ID: 13-028-20140306

We would reiterate that permitted development rights allow the MNOs to deploy communication apparatus, such as the development proposed, within certain size restrictions and subject to the prior approval of the Council, i.e. there is a 30m high mast threshold for development, (25m on Article 2(3) land or highway land), under the changes to the prior approval process, in which clearly this proposal at 20m to top falls well below this upper threshold.

National Planning Policy Framework (August 2026)

The Government's National Planning Policy Framework (NPPF) was first published in 2012 and has been the subject of many reviews over the years. The latest iteration of NPPF was published In August 2026 and includes new measures to support housing delivery around transport hubs and stronger protections for pubs.

The changes to NPPF now also provide a stronger national policy foundation to help deliver and maintain essential digital infrastructure to support all the development priorities within the NPPF and socio economic and sustainable growth.

Digital infrastructure is recognised outside the specific telecoms chapter, explicitly recognised within the strategic infrastructure that should be planned for as a key requirement of Spatial Development Strategies.

PM1 – Preparing Spatial Development Strategies
"Setting out the type, extent and broad location of strategic infrastructure needed to enable development and serve existing communities, including transport, social infrastructure, waste infrastructure, utilities provision (including renewable and low carbon energy, electricity network, telecommunications and water and wastewater infrastructure) and flood risk management schemes. The spatial development strategy should also make provision for infrastructure that is committed to in the 10 Year Infrastructure Strategy, sectoral spatial plans and any planned strategic infrastructure identified in local transport plans;" (Chapter 1, PM1, Para. 2f).

The NPPF also provides specific national policy support for the expansion and upgrading of telecommunications infrastructure.

Chapter 9 – Supporting High-Quality Communications
"The objective of the policies in this chapter is to support the expansion and upgrading of telecommunications infrastructure, in ways which limit an unnecessary proliferation of equipment and respect important environmental safeguards. Advanced, high quality and reliable communications are essential to meet changing technological, social, business and security requirements (including through delivering coverage of higher quality standalone 5G in all populated areas by 2030, and nationwide gigabit-capable broadband by 2032).."Chapter 9, Page 45

In respect of 'National decision-making policies', Policy CO1 deals with 'Proposals for telecommunications infrastructure' and states:
1. In considering proposals for the expansion or upgrading of electronic telecommunications networks, substantial weight should be given to the benefits of maintaining or improving network coverage, capacity, reliability and resilience, including where significant improvements are required such as along rail corridors. This

includes, but is not limited to, providing for next generation wireless technologies (such as standalone 5G), gigabit-capable broadband connections and supporting infrastructure such as fibre exchanges. Proposals for such development should:

a. Use existing masts, buildings and other structures already employed for this purpose, upgrade, or replace existing infrastructure, unless there is no reasonable opportunity to do so (taking into consideration meeting consumer needs, the efficient operation of the network and providing reasonable capacity for future expansion);

b. Be sited and designed to minimise the visual impact of the proposals, especially in situations where a new site or structure is proposed, so far as practical taking into account its operational requirements;

c. Not result in cumulative exposure to non-ionising radiation exceeding International Commission guidelines when the development is operational; and

d. Not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.

2. In assessing proposals for telecommunications infrastructure, local planning authorities should not require minimum distances to be maintained between telecommunications infrastructure and other development, seek to prevent competition between different operators, question the need for the expansion or upgrading of telecommunications networks, or use health safeguarding standards different from the International Commission guidelines on non-ionising radiation protection.

Policy CO2 relates to 'Supporting information for telecommunications infrastructure proposals' and states:

1 Development proposals for electronic telecommunications infrastructure (including applications for prior approval under the General Permitted Development Order, as amended) should be supported by the following, where relevant:

a. Information on the outcome of pre-submission consultation 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;

b. Where a new site is proposed, evidence that the applicant has sought to keep the number of these to a minimum in accordance with policy CO1(1)(a). This should include evidence that the possibility of erecting any antennas on an existing building, mast or other structure has been explored; and

c. Evidence demonstrating compliance with policy CO1(1)(c) and (d), including a statement that self-certifies that the cumulative exposure, when operational, will not exceed International Commission guidelines on non-ionising radiation protection.

This establishes clear national support for the expansion and upgrading of telecommunications networks, including the delivery of standalone 5G and gigabit-capable broadband, whilst recognising the need to minimise unnecessary proliferation of equipment and respect environmental safeguards.

The 2026 NPPF recognises that advanced, high quality and reliable communications are essential to meet changing technological, social, business and security requirements.

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Policy CO2 – Supporting Information for Telecommunications Infrastructure Proposals

This sets out the information that should support telecommunications proposals, expressly including applications for prior approval under the GPDO. It requires, where relevant:

- Information regarding the outcome of pre-submission consultation, particularly where development is proposed near a school or college or within a statutory safeguarding zone;

- Where a new site or structure is proposed, evidence that opportunities to utilise existing buildings, masts or other structures have been explored; and

- Evidence of compliance with the relevant International Commission guidelines, including an appropriate self-certification statement.

Other relevant sections of the NPPF include:
- Chapter 4 – 'Achieving Sustainable Development', which retains the economic, social and environmental objectives of sustainable development. The economic objective includes supporting growth, innovation and improved productivity and identifying and coordinating the provision of infrastructure.
- Chapter 3 – 'Decision-Making Policies', which sets out the national procedural policies applicable to decision-making and the consideration of development proposals.
- Chapter 7 – 'Building a Strong, Effective Economy', which supports long-term economic growth and recognises the importance of infrastructure in facilitating investment and meeting the requirements of a modern economy, including knowledge, data-driven and high-technology industries.

Taken together, these policies provide clear national support for the continued expansion and upgrading of telecommunications networks, whilst ensuring that proposals appropriately address matters including siting, design, visual impacts, use of existing infrastructure, and compliance with the relevant International Commission guidelines.

Code of Practice for Wireless Network Development in England[21]

This document, known as 'the Code', provides guidance to Code Operators (referred to as 'operators' throughout the Code of Practice), including the Mobile Network Operators and wireless infrastructure providers, their agents and contractors, local planning authorities, and all other relevant stakeholders in England on how to carry out their roles and responsibilities when acquiring the land for and installing wireless network infrastructure. It is also a useful tool for other interested stakeholders such as community groups, amenity bodies and individuals with an interest in mobile connectivity.

The current Code of Practice builds upon the aims of that which it replaced, i.e., the Code of Best Practice 2016, to support the government's objective of delivering high quality wireless infrastructure whilst balancing these needs with environmental considerations. It also has an important role in making sure that appropriate engagement takes place with local communities and other interested parties.

Although led by the Department for Digital, Culture, Media and Sport (DCMS), this Code of Practice has been developed in collaboration with representatives of the mobile network industry, other government departments and public bodies, local planning authorities, and protected landscapes.

[21] https://www.gov.uk/government/publications/code-of-practice-for-wireless-network-development-in-england

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The document outlines the Legal and Policy frameworks within which the document has been produced and reiterates the following:

> *"Digital connectivity is vital to enable people to stay connected and businesses to grow. Fast, reliable digital connectivity can deliver economic, social and well-being benefits for the whole of the UK.*
>
> *As the demand for mobile data in the United Kingdom is increasing rapidly, it is important that everyone has access to dependable and consistent mobile coverage where they live, work and travel."*
>
> Paragraphs 8 and 9

It is also important to note the Code states that:

> *"Section 10 of the NPPF sets out the planning policies for communications development in England, and states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. The NPPF also sets out that planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technologies (such as 5G). Other sections of the NPPF set out how these policies should be balanced with other considerations, including conserving and enhancing the natural environment and historic environment."*
>
> Paragraph 15

With regards to how wireless networks function, and with specific reference to 5G, the Code states that:

> *"Wireless technology continues to evolve rapidly, and mobile devices are now capable of much more. Second generation (2G) technology gave us voice calls and text messages, 3G led to the launch of smartphones, and 4G, which enabled faster browsing, allowed us to do things like watching videos on the move. 5G, the latest generation of wireless technology, is much faster than previous generations of wireless technology and can offer greater capacity and lower latency, allowing thousands of devices in a small area to be connected at the same time. 5G networks, and future mobile generations, will be vital for a range of Internet of Things uses (IoT) and Smart City applications.*
>
> Paragraph 17

The Code also outlines its 'Principles and Commitment' as follows:

> *"Operators should develop their networks and install wireless infrastructure according to the following principles and commitments:*
>
> - *Site sharing and use of existing infrastructure: make use of existing structures, sites and masts wherever possible to reduce the need for new development. The NPPF states that, when installing mobile infrastructure, the number of masts and sites should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion.*
> - *Consultation with local planning authorities, local communities and other stakeholders: participate in dialogue with local planning authorities, along with other relevant stakeholders such as the highways authorities, Area of Outstanding Natural Beauty bodies, Historic England, and Natural England, including pre-application discussions, where appropriate. Maintain clear procedures, and high-quality communication and consultation with local communities and other interested parties. Operators should agree community engagement with local planning authorities and share information as appropriate (see pre-application consultation with local communities below).*
> - *Standardised and high-quality approach to planning applications, and the notification procedure: provide standardised supporting documentation for planning applications (where appropriate)*

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within the context of national and local requirements. Ensure planning submissions are of high-quality and provide the necessary evidence to support the application (as per the NPPF).

- *Prompt responses to enquiries: respond to complaints and enquiries within a timely manner (see Review and Enquiries section below).*
- *Siting and Design: wireless infrastructure should be deployed in accordance with the guidance set out within this Code of Practice. Where appropriate, equipment should comply with the principles set out in the NPPF and consider any local planning policies, including any local and national design codes. When located in protected landscapes and other designated land, the sensitive nature of these areas must be considered.*
- *Removal of redundant equipment and site restoration: ensure that when infrastructure is upgraded, any equipment that is made redundant by the upgrade, such as brackets, is removed to benefit the local environment. Where a whole site is no longer in use, the site should be restored to its original state.*
- *Compliance with guidance laid out in the International Commission on Non Ionizing Radiation Protection (ICNIRP) public exposure levels guidance: as required by spectrum licences, comply with international guidelines for limiting exposure to electromagnetic fields (EMF) – including, as set out in the NPPF, providing a statement that self-certifies that ICNIRP guidelines will be met with all applications (see Annex C)."*

Paragraph 18

Equally importantly, the current Code outlines the role of the Local Planning Authority stating:

"Local planning authorities should support the deployment of digital infrastructure by:

- *Incentivising connectivity: support the expansion of telecommunications networks, and take a 'joined-up' approach to the wireless infrastructure planning process, including ensuring that Local Plans effectively support the deployment of digital infrastructure.*
- *Facilitating sites: engage with operators when new sites have been proposed and discuss site requirements.*
- *Engagement with operators: respond positively to requests for engagement and make decisions in line with national policy and Local Plans. For planning applications, find solutions to issues and ensure timely decisions are made.*

Information and communication: ensure that members of the public can access information about any development proposals within their local area. Send communications promptly to an appropriate operator contact (or their representatives)."

Paragraph 19

On the issue of site selection, the Code states the following:

"Planning authorities should consider… the need for a site within a limited search area alongside the public benefit of improved connectivity. In general, it should not, therefore, be appropriate for planning authorities to seek wider evidence of alternative sites (beyond that required by the NPPF), unless they consider the proposed development is unacceptable having regard to the relevant material planning considerations."

Paragraph 27

On the matter of 'Design' paragraphs 28 and 29 outline the following design principles:

"The siting of wireless infrastructure will influence which design options are most appropriate for reducing the visual impact. The following design principles are important considerations:

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- *Protecting visual amenity: a comprehensive assessment of the area should be carried out to ensure that the design solution appreciates the context of its location by fitting with both the site and the wider setting. Proposals should take into account protected sightlines, landmarks and vistas. This is particularly important when mobile infrastructure is located in protected landscapes or heritage sites and their settings (see 'Natural Environment and Heritage Assets' section below).*

- *Mitigating visual impacts: when possible, operators should look to use sympathetic designs, materials and colour (including camouflage where appropriate) to minimise the contrast between infrastructure and the area. Operators should also consider the design principles set out in the NPPF and local planning policies, and consider any relevant local and national design codes.*

There are factors that can affect the type of infrastructure that will be deployed including location and the coverage and capacity requirements. Planning authorities should be aware of these constraints when considering proposals. In particular:

- *In urban areas, where there is a high level of demand for mobile data, mobile base stations area likely to need to be deployed more densely. In these settings you can expect to see more use of streetwork monopoles and rooftop installations…"*

Paragraphs 28 and 29

The Code's subsection entitled 'Technical and operational considerations confirms that there are 3No. 'primary technical and operational considerations for sites, i.e.:

- They must supply appropriate coverage to the intended area
- They must offer sufficient capacity to meet demand; and
- They must be able to connect into the wider network

And with regards to '5G network development considerations' the Code reiterates that:

"…5G installations will be more constrained and guided by these special technical and operational considerations."

Paragraph 66

Planning Summary

A summary as to why the subject proposal adheres to all relevant policy criteria is outlined below:

- **Legislative context**

We have established that Part 16 of the GPDO ratifies that prior approval applications benefit from permitted development rights and are therefore accepted in principle by virtue of the legislation. In this case the proposed development incorporates a 20m high mast which is 20% under the threshold for development on highways land.

This prior approval relates to only the siting and appearance, nothing else can be taken into account. A prior approval is not like a planning application and The Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government have published updated guidance on the matter in July 2023, entitled 'When is permission required?' The LPA must appreciate that the planning mechanisms and statutory requirements relating to a Prior Approval application must be

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considered with a lighter touch when compared with a Full Planning Application. They are, after all, much less prescriptive with far fewer legal elements than those associated with a full planning application, i.e.:

- the planning unit does not need defined with a red edged location plan
- the application does not need to conform to both national and local validation requirements in order to be registered; and
- dischargeable conditions cannot be attached.

The Prior Approval procedure is akin to the grant of outline planning permission with the precise siting and detailed appearance of the apparatus reserved. The principle of the development is therefore approved under the provisions of the GPDO, and the determination must be confined to siting and appearance.

- **Operational Requirement**

There is a clear operational need for the development, and the proposed Cornerstone base station will allow VMO2 to provide replacement 2G/4G coverage and new 5G technologies to the area to ensure that network users can make full use of their devices. The intent is that the proposed infrastructure will supply multigenerational (2G, 4G and 5G) services technologies to the benefit of approximately 28% of the population/community, who according to recent figures are customers of the operators in question. Without this infrastructure, network users in the area will continue to experience limited services and poor network capacity, the result of which is dropped calls, buffering and poor connectivity during peak times.

- **Siting**

The siting of any new base station development is directly linked to operational need and development in the target area is critical to fulfilling the operational brief.

To ensure that the nominated site offers a viable option in terms of balancing planning and operational considerations, Cornerstone, the operator and their appointed planning and surveying Agent first undertook a desktop review of the existing sites within the wider network to assess if any could address the network requirement for reinstated and improved coverage and capacity and to establish 5G connectivity in the target area. However, in this case the infrastructure in the adjoining cell areas in the wider network is simply too far removed to do so, so a new base station development is necessary. Furthermore, if Cornerstone could upgrade their existing sites in the wider area to provide the necessary coverage and capacity to the newly created cell area, they would have done so rather than spend time, money, effort, and uncertainty associated with progressing the preceding and subject applications.

The parties then undertook several detailed surveys within the target area, employing a sequential approach to site selection. This process confirmed that there were no existing base stations belonging to other licenced operators that would be available for mast/site sharing and that would either be viable and/or available for use. The possibility of deploying a base station upon an existing structure or a building rooftop was also investigated. However, the majority of buildings in the search area have limited height and are lightweight, pitched roof, commercial units that are simply not viable for accommodating a rooftop development option. In addition, there are no other structures available on which to locate the necessary antennas.

In then seeking to identify a site for a new ground-based mast, Cornerstone had the option of either deploying apparatus on private land or using a street furniture development solution on adopted highways land, which would be accessible for build and maintenance without having to enter into any legal agreement under the New Roads and Street Works Act 1991 or the Electronic Communications Code. A street furniture development upon Council owned land was therefore deemed the best available option.

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The proposed site was considered to strike an appropriate balance between planning and operational considerations given its location within the search area and within the area of network deficiency; the lack of restrictive planning policy designations in place; its ability to limit impact upon general amenity; its separation distance from sensitive vistas; and, due to the commercial / light industrial context in which it is set. Additionally, there are no highways safety or access concerns, nor conflict with underground services.

The Applicant contends that a balance between planning and operational considerations has been struck, with the list of alternative sites provided confirming that no less harmful or more appropriate operationally viable site is available. That said, any alternative site suggestion that any interested party wishes to make will be gratefully received and investigated.

The assessment of alternative sites has been undertaken with regard to Policies CO1(1)(a) and CO2(1)(b) of the August 2026 NPPF. These policies prioritise the use, upgrading or replacement of existing telecommunications infrastructure where reasonably possible. Where a new site is proposed, applicants should provide evidence that opportunities to use existing buildings, masts or other structures have been explored. The policies do not require the identification of an 'ideal' site, but an assessment of reasonable opportunities to accommodate the development on existing infrastructure, taking account of operational requirements.

- **Appearance**

As touched upon earlier in this Statement, the design of any new base station development is directly linked to operational need. It also has to be tailored to the bespoke nature of the site in question, i.e., with consideration in a context of topography, proximity to other natural and manmade features, planning policy and other local sensitivities. It must also be structurally capable of accommodating the necessary transmission apparatus at the required height for fulfilling the operational brief.

Following the nomination of the subject site, a well-considered design process has been implemented with the applicant having to balance technical requirements with the minimisation of visual impact. As indicated earlier in this statement, 5G technologies operate in higher frequency bands than older technologies and therefore attenuation of the radio signal is naturally higher and more prone to the effects of clutter. This means that operators will often require a higher structure or antenna position to achieve the same degree of coverage footprint as preceding generations.

A top of 5G antenna height of 20m has been deemed necessary for effective operation and the only viable design option for a site on a roadside footway such as that which has been nominated is a street furniture style mast with standard cabinetry and ancillary development. Furthermore, as street furniture masts are the slimmest available within the Cornerstone design portfolio and are readily accepted throughout the UK as the most appropriate design solution for urban/suburban locations, the proposed design will also ensure that visual impact is kept to an operational minimum.

As has also been indicated earlier in this statement, the Cornerstone design portfolio no longer includes a 'camouflaged' design option, as the bigger equipment required for the latest 4G and 5G technologies require a more robust structure which in turn makes effective disguise a difficult task. In addition, the shrouding of 5G antennas seriously reduces their effectiveness, hence why no shrouding is included in the proposal.

With regards to the colour scheme, a grey mast and green cabinetry is proposed as this was considered best for assimilating within the vegetation surrounding the site, and other grey coloured street furniture,

any views that may be afforded against the predominantly grey/cloudy skyline. However, the applicant would be happy to consider any alternative colour scheme that the LPA may wish to suggest.

Cornerstone has made every effort to ensure that all elements of the final proposal have been limited to an absolute operational minimum in terms of both size and amount for the provision of an effective coverage and capacity solution to deliver reliable digital mobile connectivity to the area.

- **Impact upon amenity**

When introducing new telecommunications or indeed any infrastructural elements to any environment or landscape, the best approach is to seek to limit impact to an absolute minimum through sensitive siting and design practices, as has been the case in this instance. Therefore, when considering the issue of amenity, the decision maker must first consider the site's context and any bespoke mitigation that may exist. They must also acknowledge that general visibility and a position both within or close to the public domain and/or in general proximity to and intervisibility with roads or residences, does not necessarily equate to an unacceptable and detrimental impact. In assessing the acceptability of a development, all relevant planning considerations must be taken into account including site availability and the technical and design limitations faced by the operator, and these should be set in a context of the social, economic and environmental sustainability benefits that modern communications networks bring.

Equally, it is important for LPAs to be thorough in their assessment of such proposals and in consideration of planning history, and to ensure their interpretation of both National and Local Policy is undertaken using accurate and UpToDate information, with a well-balanced and unbiased perspective.

The discounted site information has confirmed that an exhaustive and sequential site selection process has been undertaken, and we must reiterate that the developer's obligation is not to identify the 'ideal' site but to undertake an alternative site assessment and nominate a site that is acceptable.

The Code of Practice for Wireless Network Development in England, (led by the DCMS and in collaboration with representatives of the mobile network industry, other government departments and public bodies, local planning authorities and protected landscapes) states the following:

> *"Planning authorities should consider… the need for a site within a limited search area alongside the public benefit of improved connectivity. In general, it should not, therefore, be appropriate for planning authorities to seek wider evidence of alternative sites (beyond that required by the NPPF), unless they consider the proposed development is unacceptable having regard to the relevant material planning considerations."*
>
> Paragraph 27, Code of Practice for Wireless Network Development in England,

The site has been located well within commercial / light industrial setting and does not impact upon any heritage assets or sensitive vistas. Close range views of the development will be afforded to the adjacent public roads, the immediate public domain and from neighbouring commercial premises, but none of these are particularly sensitive viewpoints. Additionally, those using them do so on a temporary basis with a dynamic perspective afforded as one travels through the area.

One must accept that infrastructure such as that proposed is not an unexpected sight in any modern landscape, let alone a commercial/industrial area. It must be recognised that mobile telecommunications base stations, like street lighting, signage, bus stops, gas, electricity, water and any other utilities/infrastructural elements, are integral pieces of infrastructure upon which, now more than ever, our society is heavily dependent.

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The proposed essential infrastructure will allow local residents, businesses and visitors in the area to access the many social and economic benefits associated with modern communications network services. High quality and reliable communications infrastructure are essential for economic growth and social well-being and the demand for mobile data in the UK is increasing rapidly as households and businesses become increasingly reliant on mobile connectivity. The infrastructure must therefore be in place to ensure supply does not become a constraint on future demand. There should be no doubt that the Government fully supports the development high quality communications infrastructure and decision makers must appreciate that the NPPF advocates that local planning authorities should also support the expansion of electronic communications networks where impact is deemed to be acceptable or outweighed by benefit.

- Flooding

A flood risk assessment is not considered necessary in this instance.

- Health

An ICNIRP Certificate has been supplied. As such, the issue of health is not a material planning consideration. However, for the benefit of further information on this matter, we would refer the reader to the additional supporting information that has been submitted with this application.

Conclusion

The proposed base station development is nationally important infrastructure being deployed at a local level, in the public interest and in line with National Government and regional aims to support the digital economy, global competitiveness, and the right infrastructure for underpinning world class connectivity.

One must appreciate that the technical requirement simply cannot be addressed from outside the target area and the criteria of both the NPPF and the LPA's planning policy has been adhered to for the many reasons outlined above.

It is our contention that in devising the proposed, multi-generational, 5G compatible base station incorporating a minimum amount and size of essential infrastructure located at sensitively chosen location, Cornerstone has afforded full respect to the amenity of the surrounding area and the sensitivities therein. It is imperative to acknowledge that it is almost impossible for telecommunications development to enhance the character or setting of the area in which it is required to be deployed and more often than not all that can be done is to seek to minimise impact to an acceptable level through sensitive siting and design practices, as has been the case.

The proposed base station has specific functional and operational criteria that cannot be expected to adhere strictly to more general policy criteria. Therefore, when considering the merits of the proposed development against more generalised policy criteria, it must be done in an appropriately weighted manner.

With regards to site selection, we would again reiterate that the NPPF does not oblige a telecommunications operator to identify the 'ideal' site but rather to apply a reasonable and sequential approach to site selection. The nominated site for the proposed development has been identified for use after an exhaustive site selection process in which existing telecommunications sites, buildings and other structures, and finally ground-based mast options were considered. The chosen site maximises the use of existing features for screening, context and backdrop purposes, avoids an overly exposed or elevated position in the landscape, and strikes an appropriate balance between operational and planning considerations.

In terms of design, all apparatus has been limited in amount and scale to a minimum operational requirement. A lesser mast height or amount and size of apparatus would simply not be operationally feasible, and we would

contend that the street furniture design and colour scheme proposed also strikes an appropriate balance between operational and planning considerations.

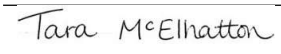
We trust that the above and enclosed information is to your satisfaction and would be happy to expand upon any aspect of this proposal if required.

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Confirmation that submitted drawings have been checked for accuracy

Contact Details

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Company:	Perry Williams Ltd for ULC		
Company Address:	United Living Connected Building 4 Clearwater Lingley Mere Business Park Warrington WA5 3UZ	Email Address:	tmcelhatton@perrywilliams.co.uk
Signed:		Date:	19/10/2026
Position:	Town Planner	(on behalf of Cornerstone)	

In the first instance, all correspondence should be directed to the agent.

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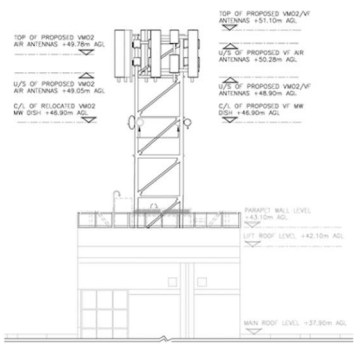
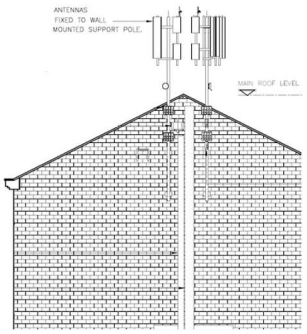
Appendices

Appendix A – Design Options

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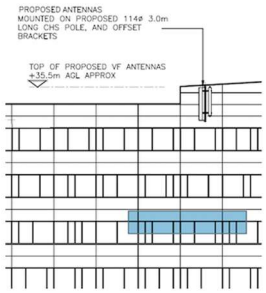
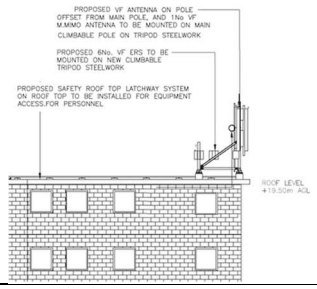
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Appendix A – Design Options

Rooftop Stub Masts 	Due to the weights and the associated engineering and steelwork required involved, stub mast solutions tend only to be deployed on large buildings with significant structural capabilities, (e.g., multistorey residential tower blocks, car parks, hotels). These masts tend to be set upon a steel grillage base or concrete plinth which further increases the structural demands upon the host building. Please see the design example below for further details as to what a stub mast looks like. A 10m stub mast with headframe including the supporting steel grillage (excluding antennas, RRUs and feeder cables), weighs approximately 4.3tonne. Without the headframe the weight would be circa 2tonnes (excluding antennas, RRUs and feeder cables).
Wall-mounted support poles 	Tend to be deployed on the gable ends of commercial or industrial buildings in the region of 15-20m in height and where sufficient wall space is available. On average, the poles and antennas will need to protrude 4-6m above the roofline to provide sufficient height for the antennas to reach the target coverage area and comply with ICNIRP requirements. However, the actual height requirement is dependent on the height of the host building, the technologies to be deployed and the presence of surrounding buildings and the way they are used, e.g. roof top terraces, balconies, windows etc. In addition, if support poles are not proportionate to the size of the host building, they will look out of place. The host building would have to be of adequate height to secure these poles safely. This type of scheme requires sufficient bracing to account for wind loading, with brackets to be bolted at intervals down the side of the building, through the entire wall and fastened internally via a number of back plates to ensure stability. The support pole needs to be a minimum of equidistant in height above and below the building height to ensure sufficient fixtures can be achieved. The poles also have to protrude above the building and surrounding features to avoid signal clipping and ensure no person can access areas of the host building's roof that may encroach upon the exclusion zone around the antennas that are supported. The internal back plate fixtures have legal implications and would be intrusive for the occupants, both during construction and maintenance with the backplates requiring checked at least once a year on routine maintenance visits. Backplates within residential properties is not viable as it would be too intrusive, both during construction and maintenance.
Wall-mounting antennas	Antennas are fixed to brackets attached to the wall allowing them to sit out approximately 200mm from the building façade and be orientated to best address the operational need, tend only to be used on large buildings in the region of 20-25m in height and in setting

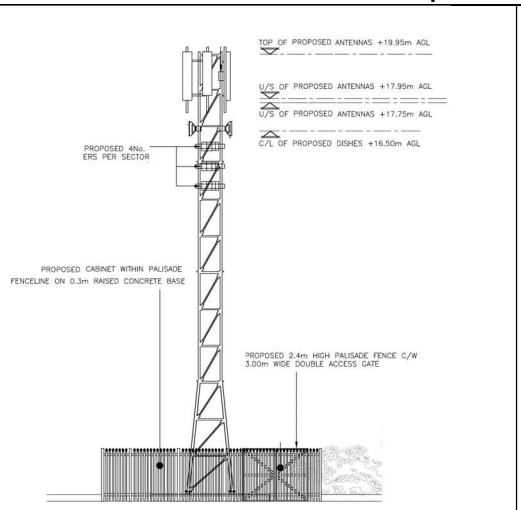
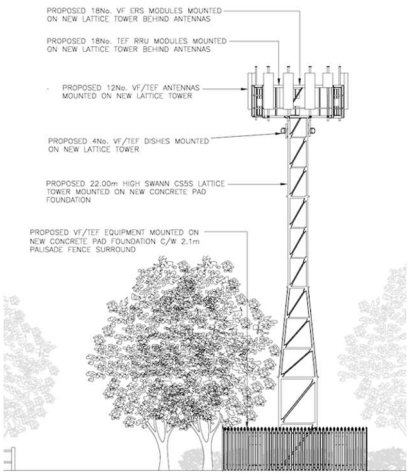
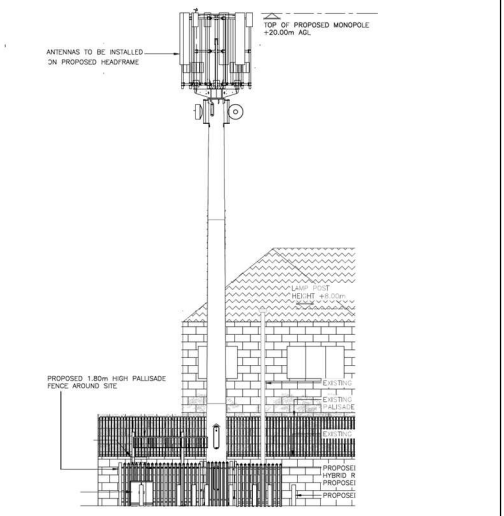
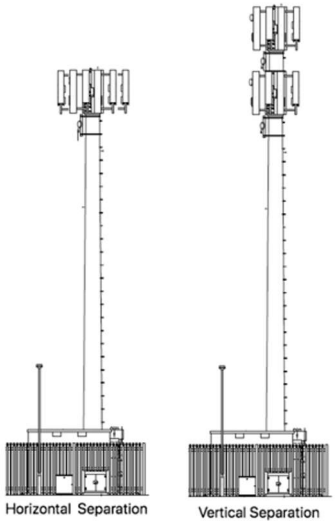
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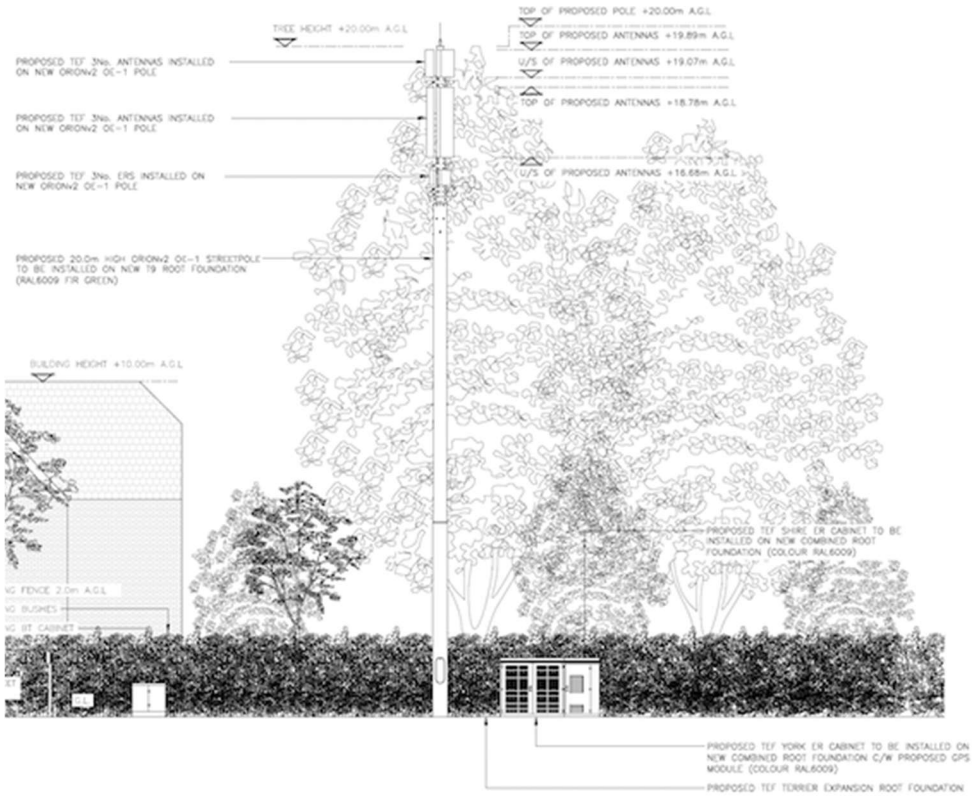
	where the neighbouring buildings are much lower in height. Antenna locations also need to avoid proximity to windows for ICNIRP reasons with easy access available for a cherry picker for construction and maintenance purposes. The bracketing upon which the antennas are fixed can either be direct to the wall, or they can incorporate a pole allowing for more acute antenna orientation, as per the design example below.
Pole-mounted antennas 	Can be deployed on medium scale, flat roofed, residential, commercial or industrial buildings. Using tripod style structures attached to newly deployed steel grillage, or the existing concrete or steelwork of the host building, the antennas will protrude 4-6m above the host building and are usually located on a central plantroom or close to the edge of the building to avoid signal clipping. The antennas also need to be positioned at a height and location that will ensure no person can access areas of the roof that may encroach upon the exclusion zone around the antennas that are supported.

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Monopole or Lattice mast solution	
	
Single operator lattice mast	Shared operator lattice mast
	
Single operator monopole	Shared operator monopole

Cornerstone has both single operator and shared, 5G compatible, multi-generational monopole and lattice style mast options within their design portfolio, as per the examples above. These masts are significantly more substantial and structurally robust than street furniture masts, thus they have a wider girth and larger footprint. The headframes on these masts offer operators the ability to orientate or tilt antennas to direct their signal to specific target areas, so their operational potential is much greater. These masts are climbable structures would need to be secured within a fenced compound, usually requiring a 10m x 10m area. Shared monopole masts would need to incorporate either a single wide headframe (left hand side in the above example) or dual stacked headframe (right hand side in the above example) to ensure the necessary separation, (either horizontal or vertical), of each individual operator's transmission equipment. Shared lattice masts would incorporate a wide headframe to ensure the necessary horizontal separation of each individual operator's transmission equipment. Monopole and lattice solutions tend to be deployed in less sensitive urban/suburban areas, for example commercial/industrial estates or recreational grounds. Lattice structures tend also to be preferred to monopole solutions in more rural settings.

Street furniture mast solution

Cornerstone currently has a single 5G compatible, multi-generational street furniture style mast for each operator within their design portfolio. These designs incorporate a dual-stacked antenna scheme whereby a 2No. sets of antennas would be located one below the other with the 5G antennas occupying the top spot. A set of remote radio units (RRUs) that are integral to the function of the antennas, is installed just below the lower set of antennas. This is not a climbable structure and can therefore be deployed without the need for security fencing.