

SUPPLEMENTARY INFORMATION
1. Site Details

Site Name:	Hogwood	Site Address:	Land off Hogwood Lane Hogwood Industrial Estate Finchamstead RG40 4PZ
National Grid Reference:	477351, 164622		
Site Ref Number:	CS-30836600 VF-024717	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:	See below
Name of contact:	See below
Summary of outcome/Main issues raised: Pre-application consultation was undertaken on 09 June 2026. This included written details of the proposed site and design, draft plans and a consultation plan. Given the non-sensitive nature of this industrial estate site, no fee was paid and no comments have been forthcoming. It has now been deemed appropriate to progress to a formal application stage, hence this submission.	

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 operator in question 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 your Local Authority would like a meeting to discuss wider Cornerstone rollout plans, then please advise. 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 initial consultation exercise: • Barkham and Arborfield Ward Councillors • Finchampstead Parish Council • Clive Jones MP, Wokingham			
Summary of outcome/main issues raised (include copies of relevant correspondence): No response has been received			

School/College

Location of site in relation to school/college (include name of school/college): None in close proximity
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:		
The development is/is not in a civil or defence safeguarding area		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	15 September 2026	

3. Proposed Development

The proposed site:
The proposed development is located on the eastern edge of the Hogwood Industrial Estate south east of Arborfield Green. The land to the east is vacant green space with new residential development taking place beyond this again. There are pockets of trees present in the general area with a line of pylons to the north east. The topography of the area is flat and there are no built or natural heritage designations present in the locale.

 Fig. 1: Site Location	 Fig. 2: Site Photo
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Enclose map showing the cell centre and adjoining cells if appropriate:

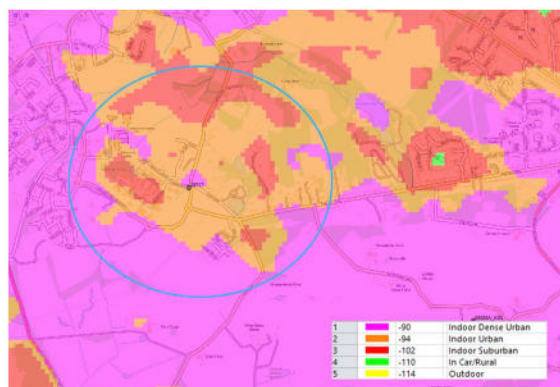
Background

Cornerstone and the operator, VodafoneThree², supply coverage in the wider area via a shared base station site deployed at Church Farm off White Horse Lane, Finchampstead, RG40 4LS. However, this site has been served with a Notice to Quit (NTQ) resulting in its forced decommissioning.

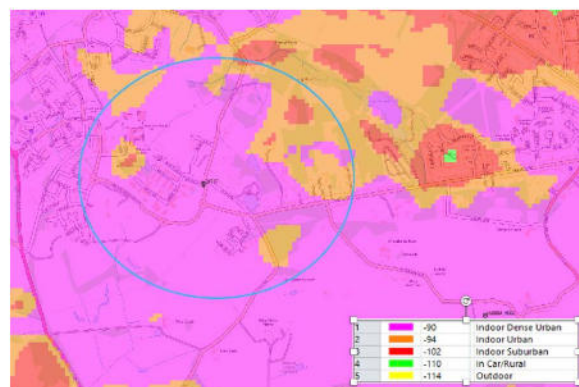
This infrastructure has been in place for some time and was in need of upgrade. The subject proposal is for a replacement solution, to provide maintained and improved 2G and 4G services whilst also facilitating future 5G digital connectivity. Given the dynamic nature of the wider network, the plan for which has evolved over time with changing technologies and customer demand, the intent is that the replacement base station be relocated much further west to best fit into the current network plan.

A set of coverage plot extracts is provided below. These show the loss of coverage that will occur when the NTQ site is decommissioned and how the proposed development will provide an effective network solution.

Fig. 3: Coverage Plots



Coverage with NTQ site removed



Coverage with proposed site operating

Crowd Source Data

- What is Crowdsourced Data?**

Cornerstone (and most industry experts) gather Android 'Crowd Source' data via 3rd party providers. If you have an Android smartphone, you can look in the phone's settings under Signal Strength. Exactly where this is found varies between phone models, but it's usually somewhere in the phone's settings; possible locations include: Settings > About Phone > SIM Status > Signal Strength. Many applications, by user consent, share massive amounts of anonymised signal readings with crowd sourced providers to help industry experts like us measure and improve network performance objectively, as experienced by the actual end-users, not just a predicted reading but the **actual** readings, as experienced by the phone users over a set period.

² On 31 May 2025 a merger completed between Vodafone UK and Three UK, creating VodafoneThree, the main objective of which is to combine networks to support a unified rollout of 4G and new 5G services. In this respect, Vodafone and Three assets will now be shared where practically and legally possible. The proposal will now also serve Three customers.

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Apple handsets support the same information in 'field test mode' but Apple keeps the data private, under its privacy policies, therefore Apple handsets are not able to contribute to assist our understanding of the network performance in this same way Android handsets are. However, due to the high volumes of both phone types in the UK market, the data is statistically significant from just the Android smartphones (e.g. Samsung/Google/HTC etc etc). The market split of usage in the UK is roughly 45% Android and 55% Apple phone use. It has been used for over a decade in international and domestic markets and is widely accepted as a good practice in the industry, and it is reasonable to suggest that the maps below show about 45% of the phone use in these areas, so numbers of incidences of 'poor signal or capacity' can roughly be doubled to show the real impact on the ground for the user.

The data can be used to show both Signal Strength and Signal Quality.

- **Signal Strength**

If you're receiving less than -120 dBm RSRP, the phone user will probably have difficulty making phone calls, sending or receiving text messages, or using internet data. 4G and 5G cellular signal strength are measured using RSRP (Reference Signal Received Power). This is a basic 'coverage' signal measure. Excellent signal strength on the RSRP scale is anything stronger than about -85 dBm; poor signal strength is anything less than about -105 dBm. Cornerstone and most industry experts use as standard these ranges for good/fair/poor shown as Green/Amber/Red below.

5G SA		5G NSA		4G		3G		2G	
RSRP	Ranges	RSRP	Ranges	RSRP	Ranges	RSSI	Ranges	RSSI	Ranges
> -90 dBm	Excellent	> -90 dBm	Excellent	> -90 dBm	Excellent	> -70 dBm	Excellent	> -70 dBm	Excellent
-105 to -90 dBm	Fair	-105 to -90 dBm	Fair	-105 to -90 dBm	Fair	-100 to -70 dBm	Fair	-100 to -70 dBm	Fair
< -105 dBm	Poor	< -105 dBm	Poor	< -105 dBm	Poor	< -100 dBm	Poor	< -100 dBm	Poor

- **Signal Quality**

If you're receiving less than about -13 dB, the phone user will probably have difficulty making phone calls, sending or receiving text messages, or using internet data. **Signal quality is a separate measure than signal strength and broadly equivalent to a 'capacity' measure.** It is another factor to keep in mind is the quality of your cellular connection – it is how much usable signal you are receiving vs. the amount of interference or noise (unwanted disturbances of the signal). **The important thing to know is that you can have strong cellular signal and still have slow data and dropped calls because your signal quality/capacity is poor.** This can vary at different times in the day when the network is busy or at capacity. Cornerstone and most industry experts use as standard these ranges for good/fair/poor; again, shown as Green/Amber/Red.

5G SA		5G NSA		4G	
RSRQ	Ranges	RSRQ	Ranges	RSRQ	Ranges
> -9 dB	Excellent	> -9 dB	Excellent	> -9 dB	Excellent
-13 to -9 dB	Fair	-13 to -9 dB	Fair	-13 to -9 dB	Fair
< -13 dB	Poor	< -13 dB	Poor	< -13 dB	Poor

The map below shows the Vodafone signal strength experienced over the 6month period December 2025 – May 2026 for Vodafone.

Although the network planner has prepared a set of coverage plots, (see Fig. 3), these can only offer a theoretical illustration of what signal is likely from the proposed development. They do not take account of the impact of

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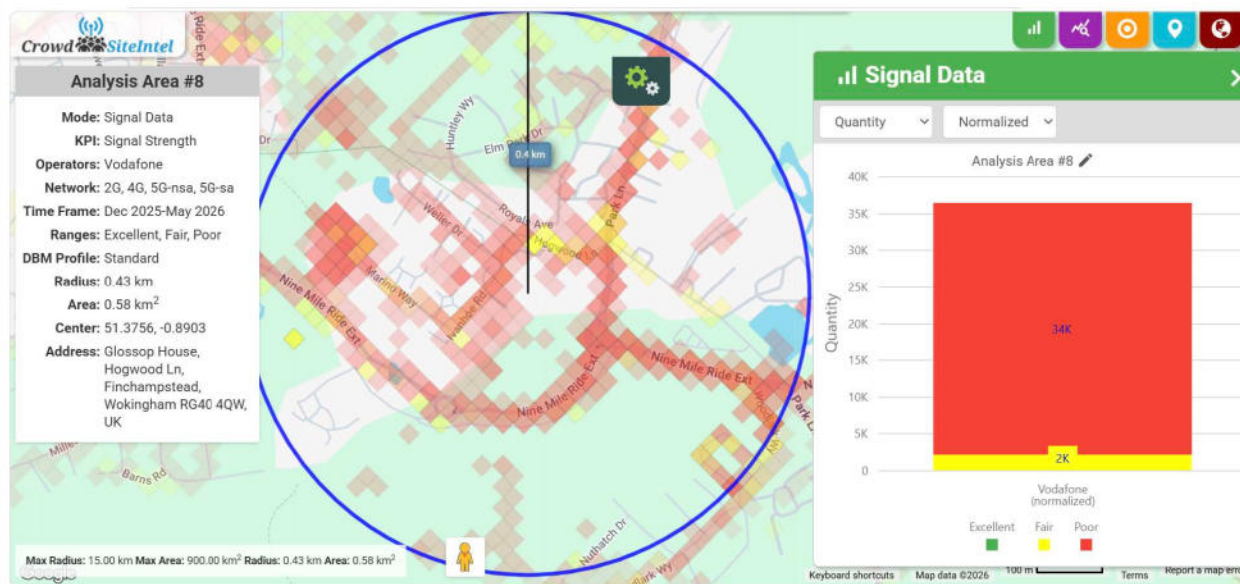
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'clutter' such as buildings or trees and cannot show network capacity. However, the information below is actual collected data from android phones that demonstrate the **actual signal strength** rather than a prediction of where the signal should be available.



As per the above, there is **very poor signal strength** in the area surrounding the proposed site.

As noted, of the 36,000 uses of the Vodafone network in the 6month period, 34,000 were classed as 'poor' with only 2,000 classed as 'fair'. The non-shaded areas show areas where no data has been collected due to the nature of the built environment.

The proposed replacement base station will include upgraded apparatus and technologies, ensuring both signal and capacity are massively improved in an area that has been subject to significant redevelopment, population growth and increased network user demand.

How mobile networks operate

As is outlined in the 'Additional Information' supplied in **Appendix B**, cellular networks comprise a series of individual cell areas, each served by a base station. Each base station has a finite traffic capacity; where demand exceeds this capacity, users can experience failed connections, dropped calls and reduced data speeds. Adequate infrastructure is therefore required to maintain effective coverage and capacity.

A cellular network can be likened to a patchwork quilt, with each cell forming part of the wider network. Base stations require supporting structures, such as masts or buildings, to raise antennas and dishes above surrounding clutter, including trees, buildings and changes in topography. The associated cabinetry serves the transmission apparatus, housing equipment and facilitating power connections.

Base stations transmit and receive radio signals to mobile devices in the area. The antennas transmit signal to the target area, while transmission dishes, which are required where fibre is unavailable, require direct line of sight to connect with other network sites. These links also connect the site to a control centre, enabling call handover, monitoring and remote maintenance.

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Mobile connectivity is needed where people live, work, travel and spend leisure time. Whilst earlier networks often relied on larger masts serving wider areas, increased users, higher data demand and newer technologies mean modern cell areas are generally smaller, more numerous and more closely related to local demand. Modern base stations therefore tend to operate at lower power while providing a more targeted coverage and capacity.

The UK's Mobile Network Operators have confirmed that 2G and 3G services will not continue beyond 2033 and 3G networks are already being switched off, freeing spectrum for faster, more reliable 4G and 5G services and improving spectrum and energy efficiency.

Each UK Mobile Network Operator uses Ofcom-licensed spectrum with different propagation characteristics. As a result, network layouts, antenna requirements, equipment and mast heights vary between operators and between individual sites, depending on local demand, constraints, ICNIRP requirements and operational need.

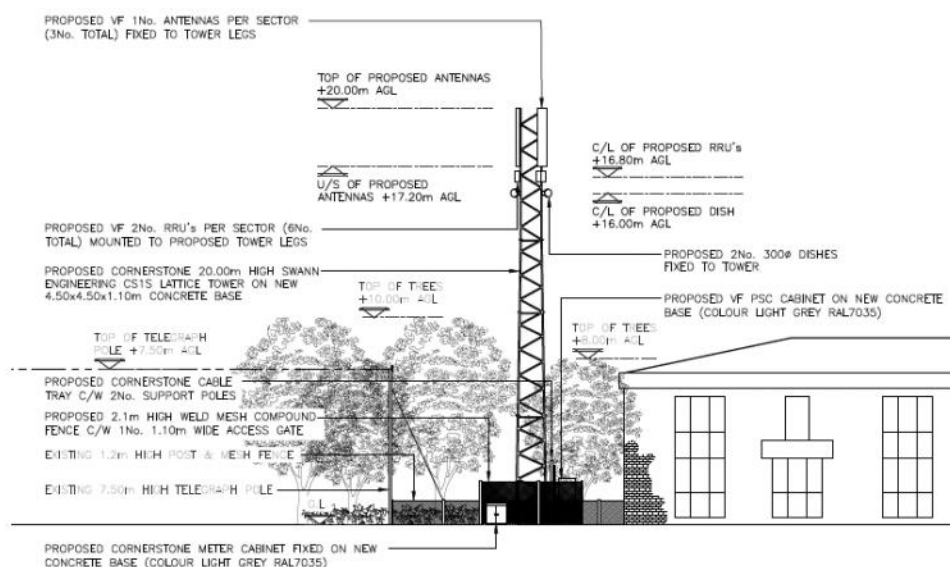


Fig. 4: Proposed Development (Elevation Plan 301 Extract)

Type of Structure (e.g. tower, mast, etc):

Description:

The proposal incorporates the following:

- 20m lattice mast (galvanised grey steel)
- 3No. antennas (grey RAL7035)
- 2No. 300mm dishes (grey RAL7035)
- 2No. equipment cabinets (grey RAL7035)
- All ancillary development

All apparatus has been limited to a minimum amount and dimension for the purpose of addressing the operational brief.

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Overall Height:	
Height of existing building:	As per plans/above
Equipment Housing:	
Length:	As per plans/above
Width:	As per plans/above
Height:	As per plans/above
Materials:	
Tower/mast etc – type of material and external colour:	As per plans/above
Equipment housing – type of material and external colour:	As per plans/above

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

Design Considerations

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, and 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 number 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. (If a shared solution is being proposed then the antennas also need to be appropriately separated to prevent interference between the operating systems).
- If a site is to be shared, each operator's antenna system needs to be separated to prevent interference between the two sets of apparatus.

Dish links

- If required, these need to achieve a direct line of sight with other base station sites within the wider network. They are a backhaul solution and sometimes called microwave or transmission dishes, in which much like antennas they need to be positioned at height and orientated to see the neighbouring dish that it is intended to link with.

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

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merits equipment cabinets and meter pillars are permitted development that don't require a formal planning determination and are likened to cabinets deployed by utility companies throughout the UK

The proposed design

The multiskilled design visit, onsite assessments and software predictions concluded that 20m to top of antenna height would be necessary at the nominated site in order to clear the immediate clutter and ensure network services are provided to the target area. In order to achieve optimum efficiency, an open headframe was also deemed necessary to facilitate bespoke antenna orientations and tilts. A set of standard cabinets was also necessary to support the transmission apparatus to be installed upon the mast.

As a result, the operator discounted the use of a street furniture style mast which offers only limited operational potential given its rigid back-to-back antenna configuration. Whilst both a lattice and monopole style mast would be viable for accommodating the headframe needed for bespoke antenna orientations/tilts, a lattice structure was nominated for use given the established presence of lattice style pylon structures in the general area and the greater transparency that a lattice structure offers when compared with a solid monopole structure.

Further details of the various design options available to Cornerstone are provided later in this statement and in **Appendix A**.

Due to the multigenerational technologies involved, height needs for effective operation and girth needed for structural integrity, 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). This is because shrouding or screening 5G antennas has a detrimental impact upon their operation, to the extent that it often renders such development unviable. In addition, modern 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 means bigger, heavier equipment which requires a more robust structure which in turn makes effective disguise a difficult task.

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:

- VodafoneThree

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.

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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

The 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 to provide replacement multigenerational network coverage and capacity, and future establishment of new 5G connectivity, to the benefit of network users that live, work and travel in area.

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

Who will be benefit from improved coverage and capacity?

According to recent figures published by MobileUK³ it was estimated that there are 87 million active mobile subscriptions in the UK and according to recent figures produced by www.which.co.uk⁴ in an article titled 'Best and Worst UK mobile networks', the customer base involved in the proposal are as follows:

- Vodafone currently have approximately 17.5 million customers (approx. 20% of the market)
- Three currently have approximately 9.9 million customers (approx. 11% of the market)

Based on these figures, one can assume that approximately 31% 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)⁵. Most MVNOs do not publicly release subscriber counts but those that will benefit from the proposal include the following:

- Vodafone: Voxi, Lebara Mobile, Talkmobile, Asda Mobile
- Three: iD Mobile, Smarty

How people in the UK are using mobile communications networks

³ <https://www.mobileuk.org/mobile-facts>

⁴ <https://www.which.co.uk/reviews/mobile-phone-providers/article/mobile-phone-provider-reviews/best-mobile-networks-overview-amhDx1F0z41t>

⁵ MVNOs are providers that offer mobile services without their own signal or infrastructure, i.e., they piggyback on one of the four major networks, i.e., those listed above and EE

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It is also important to evaluate this development proposal within a context of how people in the UK are using mobile communications networks and industry trends. We would therefore refer the reader to 'Online Nation Report 2025'⁶ which has been produced by Ofcom and was published in December 2025.

The report confirms the following:

- 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%).

It is important to also acknowledge that 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.

Operational Justification

Each new generation of mobile technology delivers improved speed, reliability, and functionality. The introduction of 5G further expands the range and quality of services available. In recognition of the social, economic, and sustainability benefits of modern digital infrastructure, the Government is committed to ensuring that both urban and rural communities have access to up-to-date mobile technology.

Without the infrastructure proposed, customers in the area will continue to experience insufficient network capacity and poor service. Existing technologies are outdated, and current demand exceeds the capability of the present infrastructure, leading to issues such as dropped calls, weak connections, and buffering.

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 2022⁷, 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.

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."

⁶ <https://www.ofcom.org.uk/siteassets/resources/documents/research-and-data/online-research/online-nation/2025/online-nations-report-2025.pdf?v=409837>

⁷ https://www.ofcom.org.uk/data/assets/pdf_file/0017/232082/mobile-spectrum-demand-discussion-paper.pdf

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Paragraphs 2.6-2.7

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'⁸, 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.

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 new 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:

⁸ https://www.ofcom.org.uk/_data/assets/pdf_file/0036/248769/conclusions-mobile-spectrum-demand-and-markets.pdf

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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)

Search Area

When looking to address any new network service requirement, the operator will usually define a 'search area' to ensure the new infrastructure can best fulfil the operational brief for the cell area in question and to ensure the base station will fit into the existing and planned network for the wider area. These parameters are set by the network planner and may differ from site to site. It is also important to note that the boundaries do not take account of topography nor existing built or natural features, so one must appreciate that not every available site within this area will be viable from an operational perspective. Furthermore, when looking to replace a previous base station site, proximity to that which is being replaced is key.

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?

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- 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
- 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.

Rooftop site considerations

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 '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**
The structural integrity of the building and support structure must be assessed against antenna weight and wind loading. Modern antennas weigh approximately 50kg each and require 3No. Remote Radio Units of around 30–35kg each. A shared rooftop site with 12No. antennas and 36No. RRUs would

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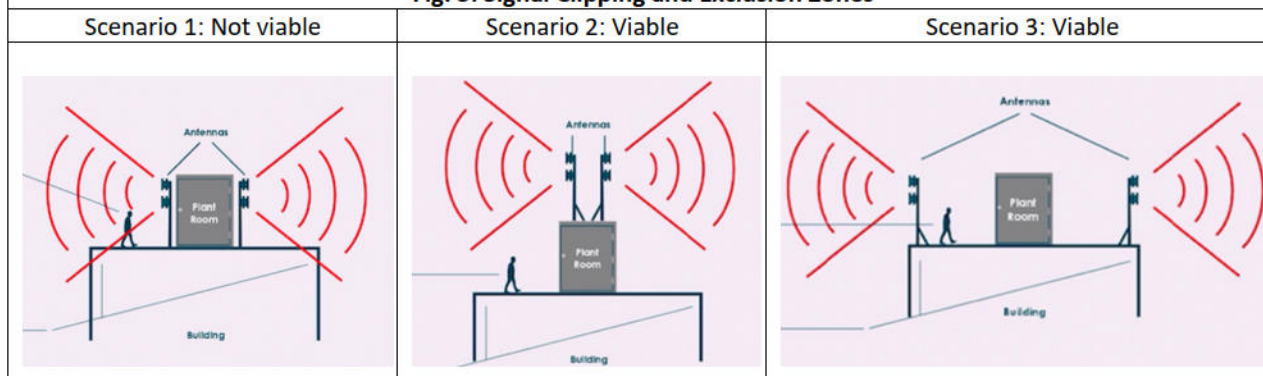
therefore weigh at least 1.6 tonnes, excluding support structures, steelwork and cabling; a single-operator site with 6No. antennas and 18No. RRUs would weigh at least 0.8 tonnes.

Further weight arises from the support structure, steelwork, cabinetry, feeder cables and any health and safety handrailing. For example, a 10m stub mast with headframe and supporting steel grillage weighs approximately 4.3 tonnes, or around 2 tonnes without the headframe, before antennas, RRUs and feeder cables are added.

Cornerstone cannot undertake significant structural alterations to make a building suitable. Where a building fails a structural survey, or is clearly unsuitable due to its design, height or loading capacity, it must be discounted. Standard 2–3 storey buildings are also generally unsuitable for multigenerational technologies, as the support structures needed to achieve ICNIRP compliance and avoid signal obstruction would often exceed the host building's height, placing undue stress on the structure and appearing disproportionate.

- 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 to diagram below which is 'Scenario 1' in the Code of Practice for Wireless Network Development in England - Annex C – Rooftop Developments.

Fig. 5: Signal Clipping and Exclusion Zones



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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.
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Ground-based site considerations

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 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

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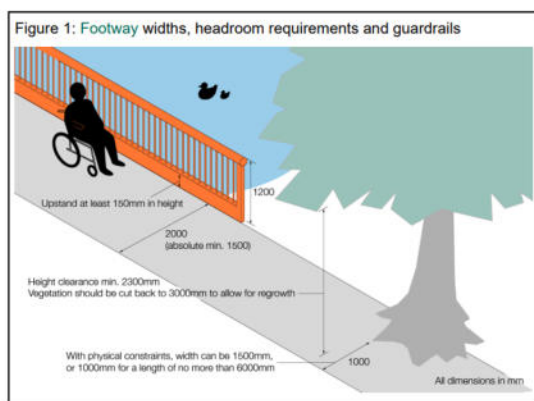
guidelines are adhered to and that those maintaining such infrastructure do not encroach upon the exclusion zones around the proposed antennas.

- **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.

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.

Fig. 6: 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**."*

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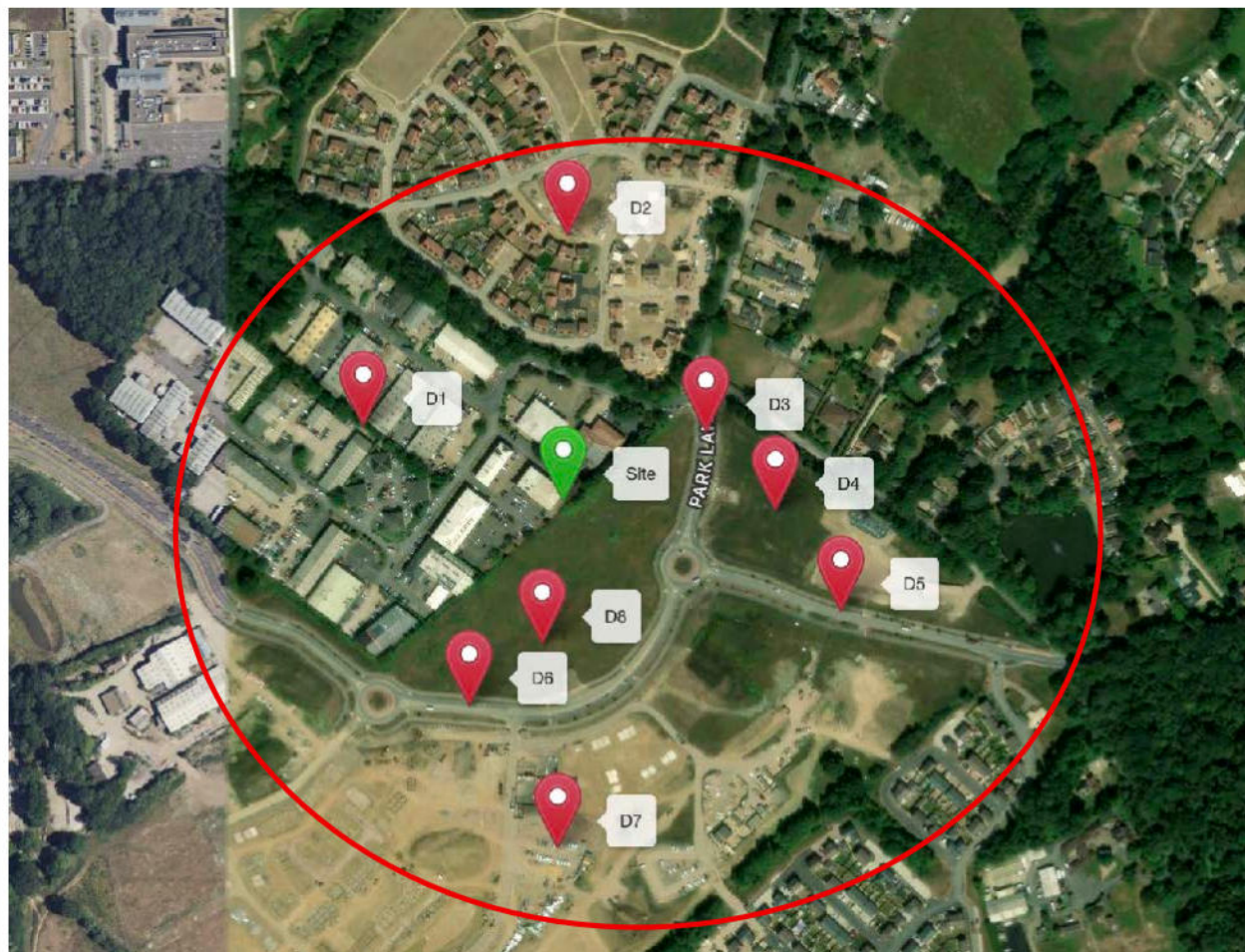
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Fig. 7: Search Area and Discounted Site Options



Site	Name / Address	NGR	Reason for discounting
NTQ	Existing base station site Church Farm off White Horse Lane, Finchampstead, RG40 4LS	478794, 164130	Cornerstone and the operator, VodafoneThree⁹, supply coverage in the wider area via a shared base station site deployed at this location. However, this site has been served with a Notice to Quit (NTQ) resulting in its forced decommissioning. This infrastructure has been in place for some time and was in need of upgrade. The subject proposal is for a replacement solution, to provide maintained and improved 2G and 4G services whilst also facilitating future 5G digital connectivity. Given the dynamic nature of the wider network, the plan for which has evolved over time with changing technologies and customer demand, the intent is that the replacement

⁹ On 31 May 2025 a merger completed between Vodafone UK and Three UK, creating VodafoneThree, the main objective of which is to combine networks to support a unified rollout of 4G and new 5G services. In this respect, Vodafone and Three assets will now be shared where practically and legally possible. The proposal will now also serve Three customers.

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			base station be relocated much further west to best fit into the current network plan.
1	Other development options in Hogwood Industrial Estate	Various	The majority of buildings within the estate are large, low-rise industrial/commercial units with expansive, lightweight, pitched roofs. These tend to measure to a height of <8m. For reasons provided under the heading 'Siting and Design Considerations' and in Appendix A, a rooftop development on such buildings is simply not viable. Although ground-based site options have also been considered, usable space is limited within each business plot, and a new base station could only be accommodated at the expense of yard space, vehicular access or car parking provision which could be detrimental to accessibility and business operations. The subject site faces no such issues and would be more centrally located in the target area facilitating a better coverage option, alternative sites in the estate have been discounted.
2	Street furniture development within residential area west of Park Lane / north of Hogwood Lane	Various	The Coronation Fields residential development is ongoing and development in this locale has been discounted as development in this locale would undoubtedly have greater planning implications given the more sensitive landuse and greater impact upon residential amenity. Furthermore, viable site options are extremely limited by lack of viable pavements/verges, presence of underground services and need to avoid impacting upon points of access to properties therein. From an operational perspective, as outlined previously in this statement, street furniture masts offer limited operational potential given their rigid back-to-back antenna configuration. In addition, one will note the presence of mature trees around the peripheries of this residential area which would impede signal transmission. All things considered, this option has been discounted.
3	Street furniture development along Park Lane	Various	There are no footways present and there is limited verge space along both sides of the road. There are also multiple mature trees present along both sides, which overhanging the road itself. In addition, there is underground services and overhead lines present. All of these issues mean that there are simply no viable site options. Even if this were not to be the case, from an operational perspective, street furniture masts offer limited operational viability due to their rigid back-to-back antenna layout and height limitations. This when taken with the limiting impact of the mature trees would render any development unviable. This option has been discounted.

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4	Pylon structure east of Park Lane	477587, 164610	Notwithstanding the health and safety implications of deploying and maintaining antennas on high-voltage pylon structures, the weight and height requirements of modern transmission equipment is simply too great for this to be a viable, i.e., the antennas could not be deployed at an appropriate height to avoid signal being impeded by surrounding clutter and the weight of the apparatus would compromise the structural integrity of the pylon. This option must be discounted.
5	Street furniture development along Nine Mile Ride (east)	Various	Although the footways and verges appear to be sufficiently wide enough in principle, subject to underground services checks, street furniture masts offer limited operational viability due to their rigid back-to-back antenna layout and height limitations. Deploying such a solution in the locale would not be able to fulfil the operational brief, whereas the proposed development has no such issues. Furthermore, the proposed development site is located in an established industrial estate and is therefore considered a more appropriate development option in terms of context and landuse. It would also have less impact upon general and residential amenity. This option has been discounted
6	Street furniture development along Nine Mile Ride (west)	Various	Although the footways and verges appear to be sufficiently wide enough in principle, subject to underground services checks, street furniture masts offer limited operational viability due to their rigid back-to-back antenna layout and height limitations. Deploying such a solution in the locale would not be able to fulfil the operational brief, whereas the proposed development has no such issues. Furthermore, the proposed development site is located in an established industrial estate and is therefore considered a more appropriate development option in terms of context and landuse. It would also have less impact upon general and residential amenity. This option has been discounted
7	Street furniture development within residential area south of Nine Mile Ride	Various	This residential development is ongoing and development in this locale has been discounted as development in this locale would undoubtedly have greater planning implications given the more sensitive landuse and greater impact upon residential amenity. Furthermore, viable site options are extremely limited by lack of viable pavements/verges, presence of underground services and need to avoid impacting upon points of access to properties therein. From an operational perspective, as outlined previously in this statement, street furniture masts offer limited operational potential given their rigid back-to-back antenna configuration. In addition, one will

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			note the presence of mature trees around the peripheries of this residential area which would impede signal transmission. All things considered, this option has been discounted.
8	Vacant land between Hogwood Industrial Estate and Nine Mile Ride	Various	Although there is undoubtedly available space for development, this is an exposed area of green space. Development on this land would result in the loss of amenity space and potentially habitat. It would therefore be much less appropriate when compared with the proposed development which sits in a light industrial /commercial context and on a brownfield site.

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.

- **UK Government Resilience Action Plan, published July 2025¹⁰**

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 Strategy¹¹**

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."

¹⁰ <https://www.gov.uk/government/publications/uk-government-resilience-action-plan>

¹¹ <https://www.gov.uk/government/publications/uk-infrastructure-a-10-year-strategy>

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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 Manifesto¹²**

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 Strategy¹³**

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.

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:

¹² <https://labour.org.uk/updates/stories/labour-manifesto-2024-sign-up/>

¹³ <https://www.gov.uk/government/publications/uk-wireless-infrastructure-strategy/uk-wireless-infrastructure-strategy>

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“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.”

- **Connected Nations 2025¹⁴**

The annual Connected Nations report measures progress on the availability of broadband and mobile services across England and 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 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**

¹⁴ <https://www.ofcom.org.uk/phones-and-broadband/coverage-and-speeds/connected-nations-20252>

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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 Paper¹⁵**

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 Paper¹⁶.

- **The Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2022¹⁷**

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.

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 groundbased 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.¹⁸ In

¹⁵ <https://www.gov.uk/government/publications/uk-digital-strategy/uk-digital-strategy>

¹⁶ <https://www.gov.uk/government/publications/levelling-up-the-united-kingdom>

¹⁷ <https://www.legislation.gov.uk/uksi/2022/278/contents/made>

¹⁸ Please note that A1(1)(c) of the GPDO also limits the height of new ground based masts on highways land to 25m

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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)¹⁹**

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 2017²⁰**

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.

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

¹⁹ <https://www.gov.uk/government/publications/future-telecoms-infrastructure-review>

²⁰ <https://www.ofcom.org.uk/phones-telecoms-and-internet/information-for-industry/policy/electronic-comm-code>

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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 here.

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.

Planning Policy and Other Material Planning Considerations

When considering the appropriateness of telecommunications development proposals, it is imperative that Decision Makers give precedence 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.

The Principle of Development

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, reduced to 25m on Article 2(3) land or highway land, under the changes to the prior approval process that were brought in in 2022.

The principle of development has therefore already been established, akin to having outline permission. Prior approval therefore relates only to 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?'²¹

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

"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

National Planning Policy Framework (NPPF) December 2026²²

The new NPPF provides clear support for telecommunications development in appropriate locations with specific reference to improving connectivity for rail users.

²¹ <https://www.gov.uk/guidance/when-is-permission-required>

²² https://assets.publishing.service.gov.uk/media/6a8334c03bd75b81e2329ac4/National_Planning_Policy_Framework.pdf

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It provides a set of general decision-making policies which should be read with the various thematic policies that have been outlined in the other chapters. In doing so, the NPPF builds upon its predecessor's aim to support growth, protect the environment and ensure decisions are made at a local level.

With regards to the role of the decision maker, 'Policy DM3: Determining Development Proposals' requires that Local Planning Authorities take a proportionate, efficient, proactive and positive approach to development proposals and implement timely decisions. The NPPF also advocates a solution-based approach.

Chapter 9 is entitled 'Supporting high quality communications' and is most relevant to the proposed development and states:

"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)."

The Chapter includes the following national decision-making policies:

"CO1: Proposals for telecommunications infrastructure

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.*

CO2: Supporting information for telecommunications infrastructure proposals

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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."*

One will note from the above that 'substantial weight' is to be applied to the benefits associated with maintaining and improving network coverage, capacity reliability and resilience.

The use of 'substantial' provides positive weighting in the favour of digital infrastructure especially when upgrading or replacing existing sites.

Given that effective communications networks and infrastructure promote sustainable development via the support for wider economic, social and environmental objectives; supports commerce and industry activity; and, are a vital element in today's modern society, other sections within the NPPF that are considered relevant are outlined below:

- Chapter 4 'Achieving Sustainable Development'
- Chapter 7 'Building a strong, effective economy'
- Chapter 14 'Achieving well-designed places'

Code of Practice for Wireless Network Development in England²³

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.

²³ <https://www.gov.uk/government/publications/code-of-practice-for-wireless-network-development-in-england>

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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.

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*

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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) 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:

"Operators use a range of sophisticated, computer-based planning tools to predict levels of signal strength and coverage from sites for 2G, 3G, 4G and now 5G. Once an operator has identified a requirement for a new cell site, a suitable site needs to be found. Elements that make a site favourable include: having existing or ready access to a power supply, access to fibre optic cables, vehicular access, and, other buildings and development which may provide a level of existing screening. Operators will typically look to upgrade existing infrastructure prior to considering a new deployment, in particular for initial 5G deployment.

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When selecting sites for mobile infrastructure, operators should examine local plans and designations for the area, as well as carrying out an in-person site search to identify potential options which meet their requirements. Operators should follow these general siting and site selection principles:

- *Installation on existing buildings/structures: where possible, operators should look to use existing buildings/structures for hosting wireless infrastructure, to reduce the environmental impact of installation. Where the erection of a new ground-based mast is required, operators should seek measures to reduce the impact of the development, where possible. For example, measures such as siting near similar structures, screening, and using simple designs and appropriate colouring can help reduce the impact of the new infrastructure in certain locations.*
- *Sharing sites/masts: sharing sites should always be considered as this reduces the total number of sites/masts required for the network and also minimises the visual intrusion caused by wireless infrastructure. This may involve redeveloping an existing site, including installing a replacement mast that can accommodate additional radio equipment. However, the visual impact of site or mast sharing should be considered in the context of each individual location.*

The installation of all wireless infrastructure requires a balanced approach between the technical needs and constraints of the proposed site and the potential impact of the development. These constraints are set out in detail in the section 'Technical and Operational Considerations'. The three key technical and operational considerations for installation sites are:

- *Coverage: wireless infrastructure needs to provide an appropriate level of coverage over the intended geographical area. This involves ensuring that antennas are elevated sufficiently (often via masts) to provide clear lines of sight for signals.*
- *Capacity: where existing network infrastructure can no longer meet the demand for network capacity in a particular area, additional sites may be required within that coverage area to meet the demand. This is more likely to be required in densely populated areas or areas of high footfall.*
- *Backhaul: the radio access network requires a connection to the core network. Backhaul is sometimes provided by a microwave link, which requires a clear line of sight between the two ends of the link.*

Planning authorities should consider these issues and 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:

- *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).*

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- *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

With regards to sites that receive a 'Notice to Quit', the Code's subsection entitled 'Technical and Operational considerations', includes the following under the heading 'Site accessibility and availability':

"...In addition, the Notice to Quit (NTQ) provisions within code agreements mean that sites have to be relocated. Where NTQs are proposed, the existing coverage and capacity will be removed and as such a replacement site is needed within close proximity to where the existing site was located."

Paragraph 71

Local Planning Policy

- **Wokingham Borough Council Local Plan²⁴**

Although work is underway on a new local plan – the Local Plan Update – which will put in place a new planning strategy for the period to 2040, replacing the current Core Strategy and Managing Development Delivery local plans, it is these documents that provide the current policy tests.

As it stands, the development plan for Wokingham Borough is made up of a collection of local plan and neighbourhood development plan documents. Together these set out a strategy for how growth and development will be managed which forms the starting point for deciding planning applications.

²⁴ <https://www.wokingham.gov.uk/planning-policy-and-developer-contributions>

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- The Core Strategy

A high-level document setting out strategy for managing development until 2026. This includes policies and strategies to provide new housing, schools, roads, places to work and other services. It was adopted by the council on 29 January 2010.

Although there is no telecommunication specific policy therein, the following general policy is relevant and should be applied in a weighted manner:

- CP1 Sustainable development
- CP2 Inclusive communities
- CP3 General principle for development
- CP4 Infrastructure requirements

- The Managing Development Delivery local plan

This builds on the Core Strategy and sets out more detailed policies for managing development. It was adopted by the council on 21 February 2014.

Although there is no telecommunication specific policy therein, the following general policy is relevant and should be applied in a weighted manner:

- Policy CC01 Presumption in favour of sustainable development
- Policy CC04 Sustainable design and construction

Planning Summary

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

- Legislative context

We have already 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. This proposal is for a 20m high mast, which is 33% under the stated threshold.

A Prior Approval application must be 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.

Whilst Cornerstone will be more than happy to provide the LPA with any further assistance they may require and will accommodate all reasonable requests for additional information; the decision maker must acknowledge and respect the legislative and procedural context outlined above.

- Operational Requirement

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There is a clear operational need for the development as has been explained with the provision of Crowd Source Data, Coverage Plots, network user information and confirmation of the pending loss of coverage that will occur due to the forced decommissioning of the existing base station. We would reiterate that neither Cornerstone, nor the operator, would go to the expense, time and effort of seeking consent for and deploying replacement infrastructure unless it was absolutely necessary.

- Siting

The siting of any new base station development is directly linked to operational need and proximity to the decommissioned base station is a key factor.

A sequential approach to site selection has preceded the nomination of this site and a detailed assessment of alternative sites that been considered but discounted has been supplied above. There are no existing telecommunications sites or buildings/other structures available for use that can fulfill the operational brief and there is no alternative but to deploy a replacement base station incorporating a ground-based mast within the area it is to serve.

The subject site is located in an established industrial estate and set in a visual context of large commercial and light industrial units, mature planting and pylon structures. It is offset from as many existing and future residential vistas as possible and is not subject to any built and natural heritage designations.

We contend 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 site is available.

Please note that the NPPF places no obligation on the developer to identify the 'ideal' site but rather advocates that they undertake an alternative site assessment that includes consideration for the use of existing masts, buildings and other structures; criteria which has been met and exceeded.

The decision maker must appreciate that every possible location does not need to be robustly demonstrated as unviable for use and that applicants do not need to provide absolute proof that no less sensitive location is available for the base station to be sited. To expect so would be a clear misinterpretation of what the NPPF requires, i.e., the provision of evidence that existing buildings/masts or other structures have been explored. There can be no doubt that alternative site options have been thoroughly investigated by Cornerstone and the operator and if the technical experts suggest that a site is unviable due to a construction issue or limited operational merit, then this should not be challenged.

- Appearance

Similar to siting requirements, the design of any new base station development is directly linked to operational need. It must also 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.

Following the nomination of the subject site, a well-considered design process has been implemented with Cornerstone and the operator having to balance technical requirements with the minimisation of visual impact. One will appreciate from the information provided earlier in this statement that the antennas must be able to 'see' the area they are to serve. They must also be able to transmit without infringement by surrounding clutter, i.e., natural and manmade features such as trees and buildings, in the locale.

A height of 20m to top of the antennas with an open headframe allowing for specific antenna orientation/tilts have been confirmed as necessary for fulfilling the operational brief and every effort has been made to limit the amount and size of apparatus to an absolute minimum. The aesthetic of the mast

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will reflect that of other structures in the locale and will offer a degree of transparency against its backdrop. The proposed grey mast and antennas are considered best for assimilating in the streetscene and contrasting least with views against the skyline.

- **Impact upon amenity**

Whilst some impact upon amenity will usually occur when introducing new infrastructure to any landscape, in the case of the proposed development this has been limited through sensitive siting and design procedures. Any limited harm that may occur is considered to be localised, acceptable and well outweighed by benefit and operational justification. Furthermore, this is a replacement base station located at an established industrial estate. Any general impact that may occur would best be described as 'neutral'.

Any available and operationally viable alternative site would bring the development into much greater conflict with residential vistas or would see the development set in a less appropriate context, which would be more harmful to amenity.

With regards to impact upon the public domain, the main opportunity to view the development will be when using the adjacent road network to the east. However, again the nearby buildings/planting all provide mitigation and backdrop. I must be acknowledged that none of these vistas are considered to be overly sensitive and those using the road networks do so on a temporary basis with their perspectives on the development constantly changing as they travel through the area.

Decision Makers must acknowledge the fact 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. Base stations are no longer an unexpected element in any modern landscape and the infrastructure, by its very nature, must be utilitarian in form; to expect otherwise would be unreasonable.

It is imperative that the decision maker recognises that visibility does not automatically equate to detrimental impact and telecommunications development is an accepted and very necessary infrastructural element. Indeed, the proposed development cannot be considered any no more 'incongruous' than other vertical utilities structures such as lighting columns or electricity structures.

When weighing up any harm that may occur against benefit and operational need, one must not forget that the proposed development is essential infrastructure, replacing a forcibly decommissioned base station site. The development will provide a more effective, enhanced network solution allowing local residents, businesses and visitors to access the many social and economic benefits associated with modern communications network services. As recognized in the NPPF, 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.

The NPPF now lends substantial weight to the maintenance and enhancement of mobile network services and 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.

In relation to the replacement base station development, there have been several recent decisions where the Inspector has heavily weighed the need to ensure coverage is not lost against any perceived visual harm. A few of these decisions that spring to mind have been quoted below.

- PINS ref: 3197522: Andover Road, Winchester

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The Inspector suggested that significant weight should be placed on NTQ replacement sites, stating:

"I attach significant weight to the public benefit arising from the continuation of local service provision... Having regard to all relevant considerations, including national planning policy and the potential availability of alternative sites, my findings are that the proposal's public benefit in maintaining and enhancing local telecommunications coverage and capacity would outweigh the limited harm arising to the character and appearance of the area."

- PINS ref: 3287882: High Road, Weald Lane

The Inspector took a similar approach to the above, stating:

"I have also found that there is a clear need for the development in this location in order to sustain and enhance communications infrastructure within the area. The evidence before me indicates that there is a lack of reasonable alternative sites within the area which would provide the required coverage. I am also convinced that, should the proposal not go ahead and the existing equipment be removed, the quality of communications services within the area would be seriously deficient. I also recognise the benefits associated with improved communications infrastructure within the area which would not otherwise be achieved... in my view, and with regard to the specific circumstances which are present in this case, the benefits of the scheme would outweigh the harm which would be caused to the character and appearance of the area."

- PINS ref: 6002827: Addison Crescent, Trafford

In this example, the Inspector comments that:

"The Framework states that decisions should support the expansion of electronic communications networks, including next generation mobile technology, such as 5G..."

...based on my observations and the evidence, I am satisfied that there are no realistic opportunities to erect antennas on existing buildings, masts or other structures. The site selection process was robust, potential alternatives discounted on reasonable grounds and the Council themselves recognise that there are no alternative appropriate sites. Accordingly, I conclude that the harm to the character and appearance of the area and to the living conditions of nearby occupiers would be outweighed by the need for the installation to be sited as proposed given the lack of suitable alternatives."

- 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

We must again reiterate that the decommissioning of the existing base station site is a matter beyond the operator's control and the resulting loss of coverage and capacity will impact approximately 31% of the local population who are expected to be VodafoneThree customers.

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

One must appreciate that the provision of replacement and upgraded infrastructure is a matter that cannot be addressed by deploying a site outside of the target area or at a peripheral location. The nominated site has been chosen as it will fit seamlessly into the existing and planned network, fulfilling the operational brief. Furthermore, a sequential site selection process has been undertaken and the nominated site has been considered the least harmful option available.

All apparatus has been limited in amount and scale to a minimum operational requirement, and a lesser mast height would simply not be operationally feasible. We would contend that the design strikes an appropriate balance between operational and planning considerations.

Once again, we would reiterate that any resulting impact will be limited and well outweighed by operational need and the many social, economic and environmental sustainability benefits that modern communications networks bring.

It must be recognised that the proposed base station has specific functional and operational criteria that cannot be expected to adhere strictly to more general policy criteria. 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 Decision Maker must provide an appropriately balanced and comprehensive assessment of all relevant planning matters, and when considering the merits of the proposed development against more generalised policy criteria, it must be done in an appropriately weighted manner.

Confirmation that submitted drawings have been checked for accuracy

Contact Details

Name:	J Kane	Telephone:	
Company:	On behalf of Cluttons		
Address:	Cluttons Yarnwicke 119-121 Cannon Street London EC4N 5AT	Email:	
Signed:		Date:	16 September 2026
Position:	Consultant Planner to Cluttons (on behalf of Cornerstone)		

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Appendices

Appendix A: **Design Options**

Appendix B: **Additional supporting information**

- **General Background Information for Telecommunications Development**
- **Radio Planning and Propagation**
- **5G Masts and Health**
- **Health and Mobile Phone Base Stations**
- **Public Benefit of Mobile Connectivity**
- **Community Information Sheets**
 - **5G Services**
 - **Health Summary**
 - **Safety Guidelines on Electromagnetic Fields from Antennas**
 - **How it works**
 - **Coverage and capacity**

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Appendix B: Additional Supporting Information

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