

Our ref: CS_125194
Your Ref: 252206

22/10/2025

Chief Planning Officer

Wokingham Borough Council
Development Management
Civic Offices
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By Email: development.control@wokingham.gov.uk

Dear Sirs

Planning Objection to Application Ref: 252206, Telecommunications Mast Rushton Farm

Description of Development – the removal of an existing 17m monopole and associated compound, and the installation of 1 no. monopole shareable mast (height 25m), antennas to be installed on headframes, operator cabinets, multi-user electrical cabinet

At – Land at Rushton Farm, Warren House Road, RG40 5RG

Cornerstone writes to make objections as part of the LPA's consultation relating to the above case, albeit Cornerstone were not consulted on this application despite it having a direct impact on their existing radio base station which they own and maintain and is proposed to be removed by the applicant.

Cornerstone is the UK's leading mobile infrastructure services company. Set up in 2012 as a joint venture between Vodafone and Telefonica (VMO2) we acquire, manage, and/or own over 20,000 sites and are committed to enabling best in class mobile connectivity for over half of all the country's mobile customers. We oversee works on behalf of telecommunications providers and wherever possible aim to:

- promote shared infrastructure
- maximise opportunities to consolidate the number of base stations
- significantly reduce the environmental impact of network development

Lack of evidence to justify the proposed development

Paragraph 122 of the NPPF (not referred to in the application) requires applications for electronic communications development (including applications for prior approval under the General Permitted Development Order) to be supported by the necessary evidence to justify the proposed development.

Icon's purported evidence to justify the proposed development is as follows:

- the description of development states '*The removal of an existing 17m monopole and associated compound, and the installation of 1 no. monopole **shareable** mast (height 25m), antennas to be installed on headframes, operator cabinets, multi-user electrical cabinet*' (emphasis added).

- Throughout the supplementary information document it is stated that the new mast will be 'multi-user', 'shareable', with 'the potential to share' as 'a replacement mast which can accommodate a maximum configuration of MNO's', 'keeping the number of telecommunications masts to a minimum', as well as being able to 'contribute to the roll-out of 4G and 5G', and 'serve the surrounding area, including residents, businesses and visitors to this area'.

As set out at paragraph 2.3.3 of the applicant's "Introduction for Local Planning Authorities" document, there are four Mobile Network Operators (MNOs) in the UK – Vodafone, VMO2, EE and Three. Vodafone and Three recently merged on 1 July 2025 to become VodafoneThree.

The "existing lattice mast", which the application suggests will be replaced, is Cornerstone's existing, operational mast. Both VMO2, and Vodafone (now VodafoneThree) currently operate from Cornerstone's existing monopole and have done for some time. 4G and 5G are already being provided by VMO2 and VodafoneThree at this location via the existing 8m smaller, and less bulky monopole already in situ. It provides high quality, advanced, reliable 4G and 5G coverage to the surrounding area including the "residents, businesses and visitors" the application suggests the taller structure is necessary to serve.

Accordingly, notwithstanding that the application documents appear to suggest on multiple occasions that the justification for the proposed development is to ensure that the site can be shareable for multi-users and/or to contribute to the roll-out of 4G and 5G, the existing mast already supports 4G and 5G equipment for both VMO2 and VodafoneThree serving the surrounding area including residents, businesses and visitors. Consequently, replacing the existing 17m mast with a 25m structure is not and has not been justified. Equally, there is no evidence to support a deficiency in the network service provision to warrant an 8m height increase and more bulky, prominent structure in this open countryside location.

Whilst Cornerstone accepts there is no legal obligation for it to be notified under planning legislation, to confirm, the applicant has at no point discussed their proposed development with Cornerstone or agreed any terms in respect of this proposal. This is relevant to whether the proposed development can be justified and the sequential approach to site selection including specifically the NPPF requirement to first explore the possibility of erecting antennas on an existing mast as set out further below. The supplementary information states 'The Site is currently occupied by an existing 17m monopole which will be removed and replaced by the proposed development **pending** planning approval' (emphasis added). To confirm, the applicant is also presently unable to bring about the removal of Cornerstone's existing mast (pending planning approval or otherwise) and, for the avoidance of doubt, Cornerstone does not agree to its removal.

There is also no evidence in the application that either VMO2 or VodafoneThree will be relocating their existing equipment to operate from the new tower, nor that the applicant has agreements in place with any additional operator users for the new tower. This is evident from:

- The proposed site layout, elevation, antenna, and equipment drawings which describe all operational equipment as "illustrative only" in location and number; and
- The fact that the applicant has also purported to provide a declaration of ICNIRP conformity but has had to accept that "as and when there are changes to the radiating equipment on site, there will be further submissions containing **operator specific** Declarations of Conformity" (emphasis added).

We also wish to clarify that at this stage none of the MNOs which are utilising the existing monopole as set out above, have any requirement to upgrade their existing networks necessitating any changes to the "existing mast" (whether by increasing its height or otherwise).

The MNOs cannot be forced to relocate to any new site and, as noted above, neither the MNOs (nor the applicant) have shown any indication that the existing monopole is not meeting the MNOs' network needs.

In the technical justification section of the supplementary information form (section 5), the form states "Enclose predicative coverage plots if appropriate e.g. to show coverage improvement" alongside the prompt "Reason(s) why site required e.g. coverage, upgrade capacity". Icon's only response is again that the proposed development is:

- Taller (as set out above and below, there is no technical justification for the increased height itself, meaning the proposed development only brings additional harm with no countervailing benefits);
- multi-user (as set out in more detail above, this is the case for the existing mast); and
- shareable (as set out in more detail above, this is the case for the existing mast).

The application states 'Icon Tower Infrastructure Ltd (Icon)... **specialising in providing sites and infrastructure for shared use by network operators**, such as the four UK Mobile Network Operators. As such, Icon increases the competition in this growing sector, which the Government recognises to be in the public interest. This is **through the provision of additional shared sites** to aid the deployment of 5G and future technologies in a cost effective manner that **reduces the costs of the network operators**. In turn this can translate into more competitive pricing for the general public consumers of their network services' (emphases added). However:

- this existing lattice mast is already for shared use by network operators as set out above on a shareable structure.
- the proposed development is not the provision of an additional shared site, it is the replacement of an existing shared site with a more harmful version without any evidenced justification or benefit.
- there is no evidence that the MNOs' costs will be reduced and, in fact, the proposed development would cause the MNOs to incur additional, unnecessary costs in removing their equipment from the existing monopole from which they are happily operating.

Cornerstone will only ever replace or build a new structure if there is an economic or technical need and in this instance that is clearly not the case. The proposal will do nothing more than introduce a new taller structure into the local environment that will have little to no benefit to the community and will not result in a reduction in the number of telecommunication installations nor minimise the impact on the local character as suggested. If future upgrade(s) are required to improve the local mobile digital network, it is anticipated these can be completed with adjustments to the existing tower (rather than a wholesale replacement together with an 8m height increase and increase in bulk) carried out as Permitted Development. There is no evidence in the application to justify the proposed development itself (i.e. the taller, bulkier mast) and any generic references to future upgrades which might be able to be done in a less harmful way do not change that.

Siting and appearance

By the application, the LPA is being asked to give prior approval to the siting and appearance of the proposed development.

As is clearly set out in the Code of Practice for Wireless Network Development 2022 a sequential approach is required for site selection.

Para 122(c) of the NPPF also requires the upgrade of an existing mast to first be considered. There is no evidence provided in the application documents confirming why the existing mast cannot be upgraded. Indeed, the supporting statement confirms that no alternative options have been explored including existing masts **'Given it is redevelopment of an existing mast, alternative options were not considered'**. This is contrary to NPPF para 122(c) which seeks evidence that where a new mast or base station is proposed evidence is required that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure.

The application notes **'In order to provide a multi-user structure which future proofs the site, the height of 25m is considered necessary; as this allows multiple operators to be located on the mast'** and that **'Given the Proposed Development is replacing an existing mast, it is not considered that it will cause detriment to the visual amenity of the area'**. It goes on to state **'the Proposal minimises impact on local character given it is situated on the Site of an existing mast which will be removed'**. As set out above, the existing mast height of 17m provides the necessary 4G and 5G coverage for VMO2 and VodafoneThree. In addition, there is no evidence in the application that the existing mast is not capable of being upgraded to facilitate additional operators on the existing mast, nor accommodating the necessary technologies for the existing operators. In fact, the majority of technology upgrades from 4G to 5G (for example) are achieved with changes to the configuration of the equipment upon an existing mast as opposed to physical modification to the mast itself (albeit 5G is already being provided from the existing monopole, as set out above). This more typical form of upgrade also avoids prolonged operational disturbance and significantly increased capital costs which can occur and be incurred during a full mast swap as the proposed development and associated works to MNO equipment, particularly where (as set out above) there is no technical justification to justify the proposed mast swap.

When looking at the balancing exercise of harm versus benefit (in particular in the context of approval of appearance of the proposed development), this proposal has little or no benefit but would result in a taller, bulkier mast increasing the prominence in the landscape to the detriment of the character and appearance of the local area (noting there are residential properties) without any evidenced benefit. Potentially, there would be no radio equipment from any of the MNOs on this new, more visually intrusive structure. This is contrary to the GPDO conditions (potentially rendering the new mast liable for removal within a short period of construction and rendering the proposed development pointless), the NPPF and the Code of Practice for Wireless Network Development.

Alternative

In other planning submissions to other local planning authorities for new towers or masts (copies available on request), agents on behalf of this applicant have stated that the GPDO prior approval legislation requires the presence of an operator on a tower/mast and that as such, if approval were granted, the applicant would not implement the proposed development until at least one operator applied to the applicant to install operator apparatus onto the proposed new tower. In the context of full planning applications (i.e. where no permitted development rights apply), we also understand that this applicant has agreed to the inclusion of conditions requiring prior commitment from operators to use the mast/tower once constructed, before they will implement the development in question. It is noteworthy that the applicant has chosen not to include anything in this regard within the details of this application, even though there is no evidence of a justification for this proposed new mast and there is no evidence that any of the MNOs will move to it.

In the absence of evidence of any agreement from any MNO to operate from the proposed new mast, as set out above this proposed mast may in fact be non-operational from a network perspective and liable for removal under the GPDO conditions in any event, the initial redevelopment will be rendered pointless and of no material benefit (contrary to the NPPF).

Summary

The application has no merit and is unsupported by any evidence to justify the proposed development, namely a speculative, taller and bulkier (and therefore more visually intrusive and harmful) mast with no end users identified (VMO2 and VodafoneThree are already happily operating from the existing monopole and there is no evidence that any of them require any upgrades to the existing installation, as set out above). The required sequential approach to site selection, including exploring the possibility of erecting antennas on the existing mast, has not been carried out in any way.

In our view, the details in the application are misleading and make assumptions that a new 25m monopole will be preferable to the LPA and operators with no evidence of such. It is clear that the 17m mast that is currently in situ is meeting the requirements of the UK MNOs which are using it; to increase height by 8m and add bulkiness with no justification – just because the GPDO allows this subject to prior approval of siting and appearance – increases harm without any technical or operational justification and without introducing any identified improved service or socio-economic benefit.

To the contrary, for the reasons summarised in this letter, the proposed mast will likely be rendered pointless and of no material benefit in contravention of the NPPF.

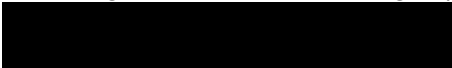
The issues raised in this objection are material considerations within the scope of planning control. The NPPF requires applications for electronic communications development (including applications for prior approval under the General Permitted Development Order) to be supported by the necessary evidence to justify the proposed development. Properly analysed, the application is not supported by any evidence to justify the proposed development. This is linked to the issues of siting and appearance for which the LPA is being asked to grant prior approval as, based on the evidence properly analysed, all that will be achieved by the proposed development (if permitted) is a more visually intrusive (and therefore harmful structure) with no countervailing benefits, or certainly none that are not already achieved by the existing structure.

I trust these comments will be taken into consideration in the determination of this application.

Yours faithfully,



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Planning & Community Manager (South)



(for and on behalf of Cornerstone)

Cornerstone

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