

## SUPPLEMENTARY INFORMATION

### 1. Site Details

|                          |                                |                         |                                                                 |
|--------------------------|--------------------------------|-------------------------|-----------------------------------------------------------------|
| Site Name:               | Burgess Hill / Kings Way North | Site Address:           | Grassed verge of Kings Way, Burgess Hill, West Sussex, RH15 0EA |
| National Grid Reference: | E: 532502<br>N: 118510         |                         |                                                                 |
| Site Ref Number:         | CS 20127121                    | Site Type: <sup>1</sup> | Macro                                                           |

### 2. Pre Application Check List

#### Site Selection (for New Sites only)

(Would not generally apply to upgrades/alterations to existing site including redevelopment or replacement of an existing site to facilitate an upgrade or sharing with another operator)

|                                                                                                                                     |     |    |
|-------------------------------------------------------------------------------------------------------------------------------------|-----|----|
| Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority? |     | No |
| If no explain why:                                                                                                                  |     |    |
| No publicly accessible mast registers available                                                                                     |     |    |
| Were industry site databases checked for suitable sites by the operator:                                                            | Yes |    |
| If no explain why:                                                                                                                  |     |    |
| N/A                                                                                                                                 |     |    |

#### Site Specific Pre-application consultation with local planning authority

|                                    |     |
|------------------------------------|-----|
| Was there pre-application contact: | No  |
| Date of pre-application contact:   | N/A |
| Name of contact:                   | N/A |

<sup>1</sup> Macro or Micro

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Registered in England & Wales No. 08087551.

VAT No. GB142 8555 06

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1530 Arlington Business Park,  
Theale, Berkshire, RG7 4SA

Summary of outcome/Main issues raised:

A copy of pre-application consultation letter, site plans and consultation plan were sent to the LPA on 15/01/2026.

No comments have been received to date.

### Annual area wide information to planning authority

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |    |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|
| Has annual area wide information been provided?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | No |
| If no explain why:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |    |
| <p>Summary issues raised:</p> <p>Cornerstones commercial relationship with Virgin Media O2 (VMO2) has changed, effectively increasing our independence to work with other companies in the deployment of mobile infrastructure. It means we no longer have visibility of VMO2's full update plan. However, Cornerstone is fully committed to working closely with Local Planning Authorities and following best practice guidance.</p> <p>We aim to engage and work with the planning department at the earliest opportunity from when we are 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.</p> |    |

### Community Consultation

|                                                                                                                                                                                                                                                                                                                                                                                    |     |       |       |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|-------|-------|
| Rating of Site under Traffic Light Model:                                                                                                                                                                                                                                                                                                                                          | Red | Amber | Green |
| <p>Outline of consultation carried out:</p> <p>A copy of pre-application consultation letters and site plans were sent to the local ward councillors for Burgess Hill Franklands District (Cllr D. Eggleton and J. Henwood) and the county councillor Burgess Hill East (R. Cherry), the clerk to Burgess Hill Parish and the local MP Alison Bennett via email on 15/01/2026.</p> |     |       |       |
| <p>Summary of outcome/main issues raised (include copies of relevant correspondence):</p> <p>No comments received to date.</p>                                                                                                                                                                                                                                                     |     |       |       |

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### School/College

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

### 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?                                                       |  | No |
| Has the Civil Aviation Authority/Secretary of State for Defence/operator of the civil safeguarding area or defence safeguarding area been notified? |  | No |
| Details of response:                                                                                                                                |  |    |
| N/A                                                                                                                                                 |  |    |

### Developer's Notice

|                                      |                                                                                                                                                                                     |  |
|--------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| Copy of Developer's Notice enclosed? | Yes                                                                                                                                                                                 |  |
| Date served:                         | Developer's Notice, covering letter and site plans were sent to the highways department on 27/01/2026 via email. Notice and proof of delivery attached as part of this application. |  |

### 3. Proposed Development

|                                                                                                                                                                    |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| The proposed site:                                                                                                                                                 |
| <b>Background:</b>                                                                                                                                                 |
| Cornerstone is the UK's leading mobile infrastructure services company. They acquire, manage and own over 20,000 sites and are committed to enabling best in class |

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mobile connectivity for over half of all the country's mobile customers. They 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

As part of Cornerstone's continued network improvement programme, there is a specific requirement for a new radio base station at Kings Way North to provide improved 4G and new 5G coverage and capacity, ensuring that this area of Burgess Hill has access to the latest technologies.

3G (and eventually 2G) has now been switched off by the operators in order to repurpose these radio frequencies for faster more energy-efficient 4G and 5G services. 3G is primarily used for mobile data services. It has been switched off first because it has already largely been superseded by 4G. Hence the importance of providing the latest 4G and new 5G service provision in areas where there is no such coverage. All four main operators have now turned their 3G equipment off. As a result, it is imperative that the operator builds resilience into the network.

### **Proposed Development**

The proposed works comprise the installation of a 17.5m monopole supporting 6 no. antennas, 2 no. 300mm transmission dishes, 3 no. equipment cabinets and ancillary development there to including 3 no. Remote Radio Heads (RRHs).

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**Figure 1. Proposed Site**

The proposed radio base station is proposed to be located on a grass verge on the West side of Kings Way, just north of the junction with Burdocks Drive. The area is predominantly residential with the site being situated away from the frontages of the surrounding houses. North of the proposed site is Kings Way, a busy single carriageway road with residential properties located along the majority of the road. There is a small bridge circa 178m north due to the presence of the a rail track.

To the east of the proposed site are residential gardens and properties. There are 4 properties that would have views of the site from their rears (3-11 Cold Waltham Lane), however there is a footway, small electrical substation and the gardens separating the proposal from the nearest window. Further east are residential properties which

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face 90 degrees away from the site, minimising the visual impact of medium-long range views.

The south of the proposed site continues Kings Way with the junction of Burdocks Drive circa 27m away. there are residential properties along Kings Way in this direction too but they are all angled 90 degrees away from the proposed site, restricting any views. To the west are residential properties situated along The Holt and Lurgashall, these properties are separated from the site by Kings way and angled 90 degrees away.

### **Planning History for telecommunications in this area**

01/01569/TEL42 - Erection of a 12.5 metre monopole, antenna system, equipment cabin and development ancillary thereto for One2One (now known as EE) Refused on 09/2001.

DM/16/1533 - Installation of 1 no. 15m Elara streetpole mast with 3 no. antennas, 2 no. equipment cabinets and ancillary development for Cornerstone. Refused on 05/2016.

DM/17/1309 – Installation of 1no. 15.0m Pandora Streetpole with 3no. antennas, 2no. dishes, 2no. equipment cabinets and ancillary development thereto on the highway maintained grass verge for Cornerstone. Refused on 04/2017.

APP/D3830/W/17/3178802 (DM/17/1309) – appeal dismissed

DM/18/3924 - Telecommunications base station, consisting of a 15m high streetpole, supporting 3 No integral antennas, and associated ground-based equipment cabinets for Cornerstone. Refused on 11/2018

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**Map 1: Previous failed site locations**

Evidenced above, the applicant (excluding 01/01569/TEL42) has faced difficulty siting a radio base station here since 2016. These decisions all pre-date the introduction of 5G technologies which was first introduced in 2019, hence the required height requirements for the monopole previously have been lower. The applications pre-date the Government relaxing the prior approval legislation as they deemed the roll-out of 5G too slow. The below and attached coverage plots evidence the operators ongoing coverage issues, this will only be resolved by siting a mast in this suburban location.

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

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The installation of this ground-based installation will enable enhanced 2G and 4G coverage and capacity to the surrounding area as well as provide new 5G service provision for one of the Cornerstone operators to ensure high quality customer experience is obtained as demands on the network increase and technologies change.

The proposed location and height will allow for the optimum level of coverage to be provided to the target coverage area. The new site will also improve capacity on the existing network, as more people require mobile access for phone calls and mobile internet at once. Increasing the capacity of the network will ensure more people are able to use their phones at the same time whilst reducing the risk of calls dropping, internet buffering etc.

Without the new installation at this location, the operator's customers will not be able to use their handheld devices as intended. The lack of coverage and sufficient capacity would result in buffering and dropped calls, leaving customers with unreliable service in this area and creating a gap in coverage.

The National Planning Policy Framework states that local planning authorities should not question the need for the telecommunications system, which the proposed development is to support. However, for the avoidance of doubt as set out below the proposed installation is needed for VMO2, via Cornerstone to enhance the existing 4G coverage and capacity whilst also providing new 5G services to the Kings Way North area.

Coverage maps are a useful tool for establishing network coverage in an area. They are developed using assumptions regarding the handset use, expected level of call reliability and signal loss within a vehicle or a building. However, plots only tell part of the story as even when the coverage plots provided show good coverage in an area there may still be a requirement to improve capacity and as such local network services. Coverage plots show coverage issues only; they cannot show capacity issues.

The coverage plots attached and below show Kings Way North currently has a hole in coverage for this operator. There is currently no 4G coverage to the in the wider surrounding area, which as shown in the coverage plots will be enhanced to indoor dense urban (high quality indoor 4G coverage) to the north, east, south and west of the site once it is installed.

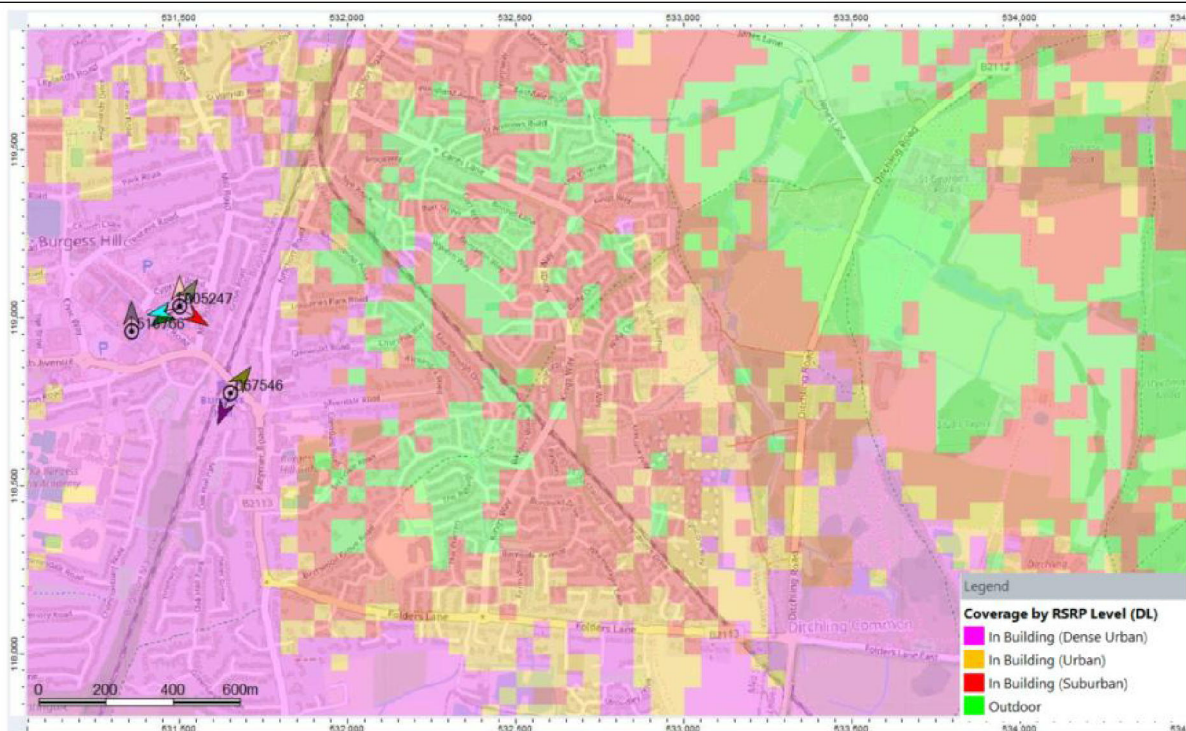
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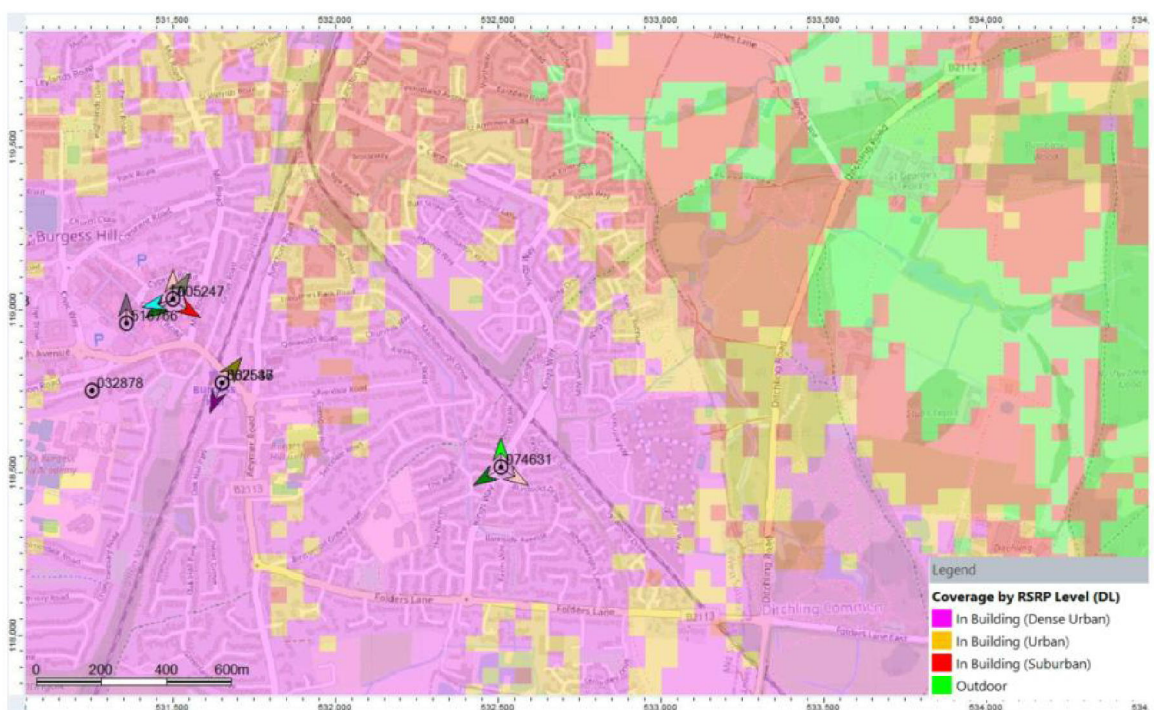
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**Figure 2: Existing 4G coverage in Kings Way North without new site**



**Figure 3: Proposed 4G coverage in Kings Way North with new site**

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The above plots show the 4G coverage. However, the site will also provide enhanced 4G coverage to this area. Although the 5G coverage is not shown on the plots, it will follow the 5G footprint, ensuring that 4G coverage will be available in a similar area as the improved 5G coverage.

When this 'Capacity' is exceeded, although 'Coverage' remains present, the base station cannot provide service to any further users and calls/text/data usage would be unavailable. This is contrary to the purposes in which the operator's customers purchased their handheld devices as well as the Government's latest thinking that everyone should have access to the information superhighway wherever they are. Capacity is the maximum data or calls that can be processed by a base station.

Therefore, without this installation, the area would continue be detrimentally affected as they continue to try to serve a much larger demand. The result would be constant buffering and dropped calls to the surrounding area, to the detriment of locals, businesses, students and visitors to the area. Therefore, coverage is worse than the plots can predict.

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

Description:

The proposed works comprise the installation of a 17.5m monopole supporting 6 no. antennas, 2 no. 300mm transmission dishes, 3 no. equipment cabinets and ancillary development there to including 3 no. Remote Radio Heads (RRHs)

Overall, Height: 17.5m

|                                                 |            |
|-------------------------------------------------|------------|
| Height of existing building (where applicable): | N/A Metres |
|-------------------------------------------------|------------|

Equipment Housing: York Cabinet

|         |              |
|---------|--------------|
| Length: | 0.600 Metres |
|---------|--------------|

|        |              |
|--------|--------------|
| Width: | 1.900 Metres |
|--------|--------------|

|         |              |
|---------|--------------|
| Height: | 1.750 Metres |
|---------|--------------|

Equipment Housing: Shire Cabinet

|         |              |
|---------|--------------|
| Length: | 0.600 Metres |
|---------|--------------|

|        |              |
|--------|--------------|
| Width: | 1.050 Metres |
|--------|--------------|

|         |              |
|---------|--------------|
| Height: | 1.750 Metres |
|---------|--------------|

Equipment Housing: Terrier Cabinet

|         |              |
|---------|--------------|
| Length: | 0.600 Metres |
|---------|--------------|

|        |              |
|--------|--------------|
| Width: | 0.700 Metres |
|--------|--------------|

|         |              |
|---------|--------------|
| Height: | 1.750 Metres |
|---------|--------------|

Materials (as applicable):

|                                                        |                           |
|--------------------------------------------------------|---------------------------|
| Tower/mast etc – type of material and external colour: | Grey – Steel – Galvanised |
|--------------------------------------------------------|---------------------------|

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|                                                           |                   |
|-----------------------------------------------------------|-------------------|
| Equipment housing – type of material and external colour: | Steel - Fir Green |
|-----------------------------------------------------------|-------------------|

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

One of the main thrusts of 'Supporting High Quality Infrastructure' in the NPPF is a reduction in the proliferation of telecommunications sites. The guidance states operators:

*"should aim to keep the numbers of radio and telecommunications masts and the sites for such installations to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used, unless the need for a new site has been justified. Where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate".*

The applicant has adopted a sequential approach to site selection; however, no existing base stations or structures were suitable, available and deliverable as detailed in Section 5. The design of the proposed equipment is considered to be the least visually intrusive option available given the level of equipment required for 5G (see additional supporting statement–5G Explanatory Note).

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

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

- antennas are specifically orientated to transmit effectively and efficiently without signal being impeded;
- dish links (if required) achieve a direct line of site connection with other base station sites within the network; and
- GPS modules achieve a direct satellite link

To achieve this the operator undertakes panoramic assessment to determine what is the minimum height for transmission equipment to be located in a context of local topography and clutter, such as manmade or natural features, and in all cases the operator is committed to limiting the size and amount of apparatus to an operational minimum.

The operator has carefully considered the design of the new proposed column. The operator is proposing the most sensitive design currently available to provide the necessary coverage and capacity to the surrounding area. Due to all the technologies that will be available at this location, 2G, 4G and new 5G for 3 different operators, 6 antennas need to be installed at the top of the slim-line monopole. These are split into a tri stack formation where 3 antennas will be located at the top in a

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dual stack, with the other 3 located underneath. The 3 upper antennas will provide 2G and 4G service provision. The 3 lower antennas will provide new 5G technology for the operator to the surrounding area. This makes the 5G antennas 2.45m lower than the top of the pole. Thus, if the column were to be any lower, the antennas would not be able to clear the trees, buildings and urban clutter and as such would not be able to operate effectively.

The proposed height at 17.5m is essential in order to provide coverage to the target coverage area. 5G new radio technologies operate in higher frequency bands than older technologies. Since it operates at higher frequencies where attenuation of the radio signal is naturally higher, and the effects of clutter are greater it will normally require a higher structure to achieve the same coverage footprint. To increase capacity and data speeds to the user, the antenna will normally need to be mounted higher than conventional antennae. These factors drive a requirement for an increase in antenna height in 5G, especially given the densely built up nature of the area.

The antennas are all unshrouded for technical reasons. However, they have been designed to be as tight as possible and virtually the same width as the main column, to minimise their visual appearance. The higher the radio frequency the more signal attenuation there is. The higher frequency 5G antennas are unable to operate effectively through the Glass Reinforced Plastic that a shroud is made up of and as such if these antennas were to be shielded then they would not be able to provide the necessary coverage to the target coverage area. An additional installation would be needed elsewhere within the cell area, leading to the proliferation of masts.

This is the slimmest design possible which will enable all the multi technologies to be supported from this site. If the column and shroud width were to be any slimmer than the technology would not fit in the one column and another radio base station would be required, which would lead to the proliferation of masts contrary to national Government guidance set out in the NPPF and The Code of Practice. Similarly, if the column were to be a uniform width throughout then the overall width would have to increase which would appear more visually prominent in the area than the proposed design.

The design of the column resembles as closely as possible the other existing vertical structures within the immediate area including lighting columns and road signage. These vertical structures will continue to help the proposed installation of this radio base station assimilate with the surrounding area.

The design of the column maintains its simple, functional, vertical structure which will not appear incongruous within the area. This is especially so given its careful siting in line with other vertical elements of the road. The presence of other linear urban structures such as lighting columns and road signage will assist with assimilation in the

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area. The column will be coloured grey to match the other elements of street future such as the lighting columns and blend in with the often grey sky. Although the column can be coloured any other colour the LPA consider appropriate.

The cabinets are similar to other statutory undertakers' equipment cabinets and are proposed to be coloured green but, like the pole, can be changed to any other colour the LPA consider appropriate. They have been placed alongside the proposed mast to minimise their appearance.

It is therefore considered that the proposal before you strike a good balance between environmental impact and operational considerations. The proposed height and design represents the best compromise between the visual impact of the proposal on the surrounding area and meeting the multi technical requirements for the site. Taking all matters into account, it is considered that this proposal, to provide the latest of 2G and 4G service provision and new 5G coverage to the surrounding area, would not appear out of place within its surroundings and would provide enhanced high quality, reliable and secure coverage and capacity, delivering the capability for a multi hi tech service.

#### Health and Safety - including ICNIRP compliance

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)

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, Telefonica UK Ltd operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision.

As part of Telefonica's network, the radio base station that is the subject of this application will be configured to operate in this way.

All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitters in accordance with the conditions of the licence fulfils the legal

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obligations in respect of interference to other radio systems, other electrical equipment, instrumentation, or air traffic system. 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 included investigation and remedy of any reported significant interference.

#### 4. Technical Justification

**Enclose predictive coverage plots if appropriate, e.g. to show coverage improvement. Proposals to improve capacity will not generally require coverage plots.**

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

A mobile phone transmitter is designed to cover a specific area and links its coverage to the next site in the network. However, in certain areas there will be gaps between these cells, resulting in a loss of coverage. This can be for a variety of reasons, the most common being topography or buildings which block the path of the signal. The operators' network rollout programme is designed to identify and address these gaps within their coverage and ensure that people can use their phones whenever and wherever they are.

The National Planning Policy Framework states that local planning authorities should not question the need for telecommunications systems, which the proposed development is to support. However, for the avoidance of doubt as set out below the proposed installation is needed for VMO2, via Cornerstone to enhance the existing 4G coverage and capacity whilst also providing new 5G services to the Burgess Hill area.

The term 'capacity' refers to the fact that each base station can only provide services to a certain number of users at any one time. When this is exceeded, coverage may remain present, the base station cannot provide service to any further users and calls/text/data usage would be unavailable. This is contrary to the purposes in which the operator's customers purchased their handheld devices as well as the Government's latest thinking that everyone should have access to the information superhighway wherever they are. Capacity is the maximum data or calls that can be processed by a base station.

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

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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 over 3 or 6 months or longer.

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's 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

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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 current signal strength over the last 6 months for O2. The operators Radio engineers have provided **predicted** coverage plots which are a theoretical illustration of what signal is likely from the proposed installation, but is not able to take account of the impact of 'clutter' such as buildings or trees and cannot show network **capacity**. This information below is actual collected data from android phones that demonstrate the actual strength of the signal rather than a prediction of where the signal should be available.

This map below shows very poor signal strength in the area surrounding the proposed site, particularly to the west and east. This is currently displayed as 178,000 uses of the O2 network were classed as 'poor' and only 323,000 as fair which still means the signal is limited. As can be seen by the graph below, only a tiny proportion of phone uses were excellent. White areas show are where no data has been collected and this may be inside someone's private property/grounds.

This map below shows a poor 4G signal strength in the area surrounding the proposed site and for a 0.5km radius of it. This is currently displaying 80% of uses on the O2 network were classed as having 'poor' signal data and 17% of uses were recorded as having 'fair' results. As further demands are experienced on the network, if the operator does not upgrade their apparatus to the latest technologies then these experiences will worsen over time leading to increased levels of dropped calls and buffering. White areas show areas where no data has been collected due to the nature of the built environment. In this respect it can be seen the majority of the area is currently being affected from both coverage and capacity for 4G.

### Signal Strength (Coverage) 4G VMO2 last 6 months June-Nov 2025

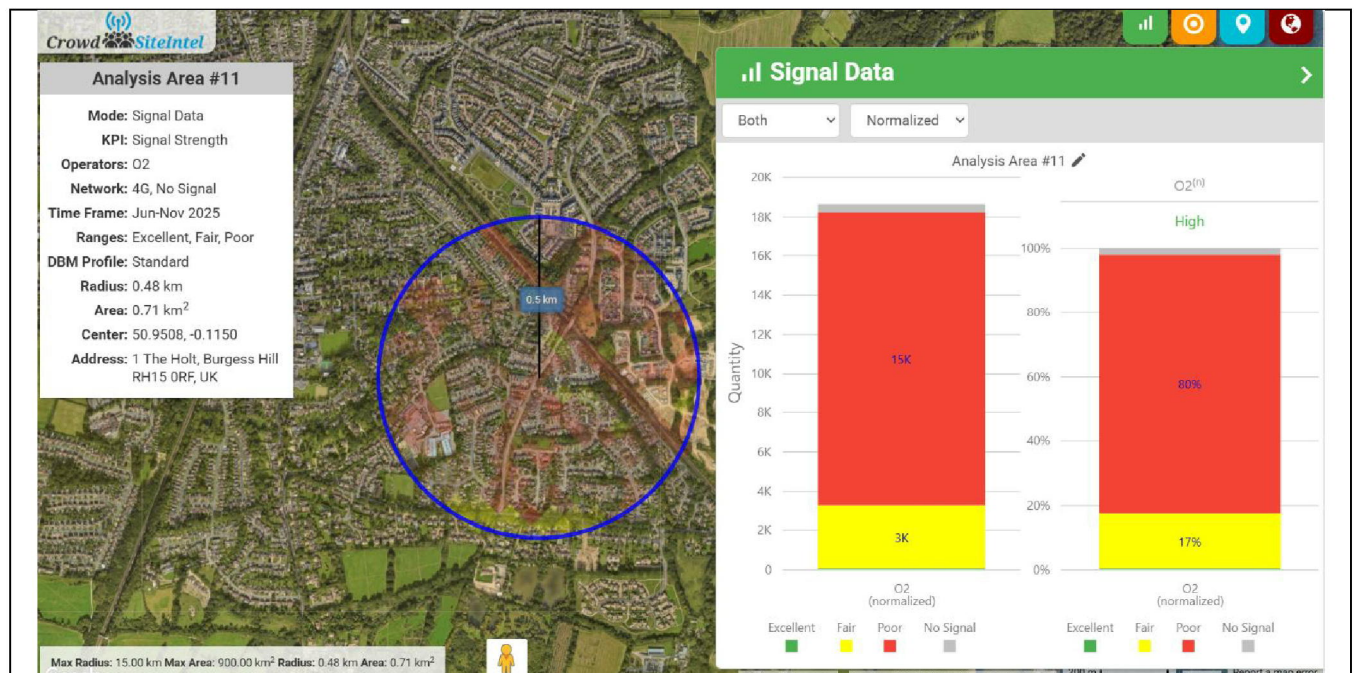
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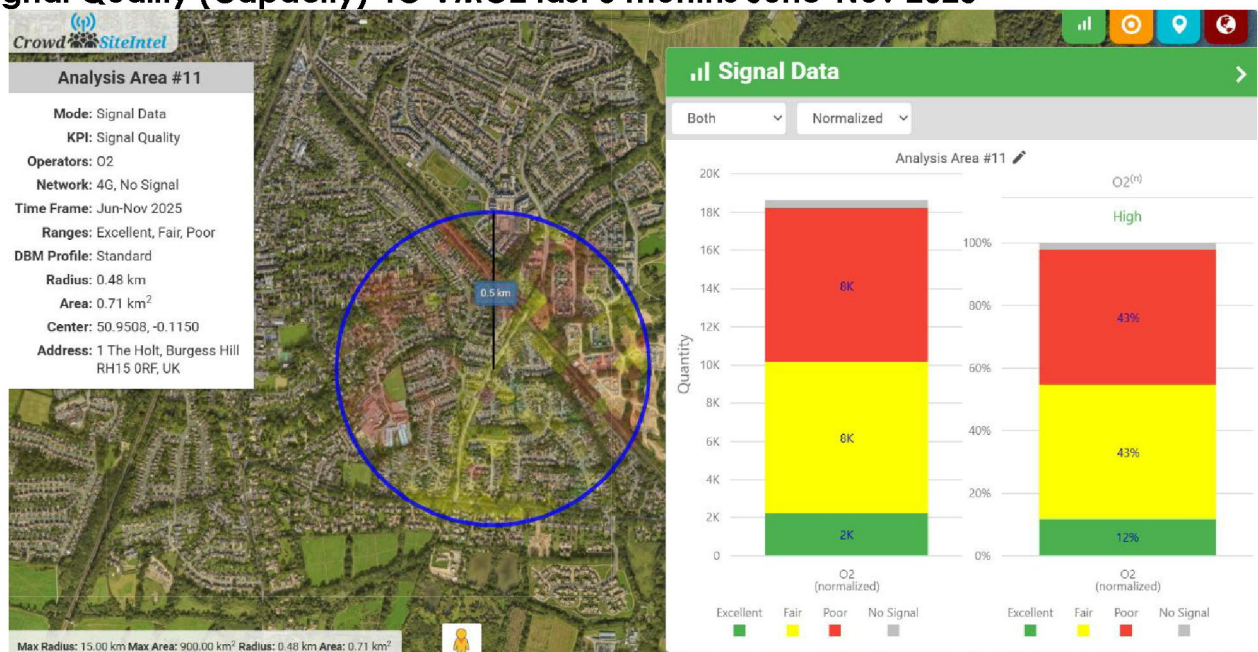
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## Signal Quality (Capacity) 4G VMO2 last 6 months June-Nov 2025



This map below shows a poor 5G signal strength in the area surrounding the proposed site and for a 0.5km radius of it. The number of users not being able to access the 5G network is at 12%, with 40% of uses on the O2 network were classed as having 'poor' signal data and 48% of uses were recorded as having 'fair' results. It is a similar scenario with 5G capacity with the figures showing 12% having no access (due to no coverage), 17% having 'poor' and 36% having 'fair'. These issues with capacity means

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even if coverage is available then dropped calls and buffering will still be experienced. In this respect the proposed installation at the crossroads shall ensure both signal and capacity are massively improved; with network capacity being the main driver for this site. If the network is not upgraded to improve capacity the situation will get worse as more customers put pressure on the network leading to dropped calls, none to poor call set up, less capacity in the area leading to a poor to no service. This would be contrary to the operators legal license requirements to provide high quality service. However, the main reason for the site is to provide the coverage initially, as evidenced by the coverage plots that show there is currently a hole for this operator.

### Signal Strength (Coverage) 5G VMO2 last 6 months June-Nov 2025



### Signal Quality (Capacity) 5G VMO2 last 6 months June-Nov 2025

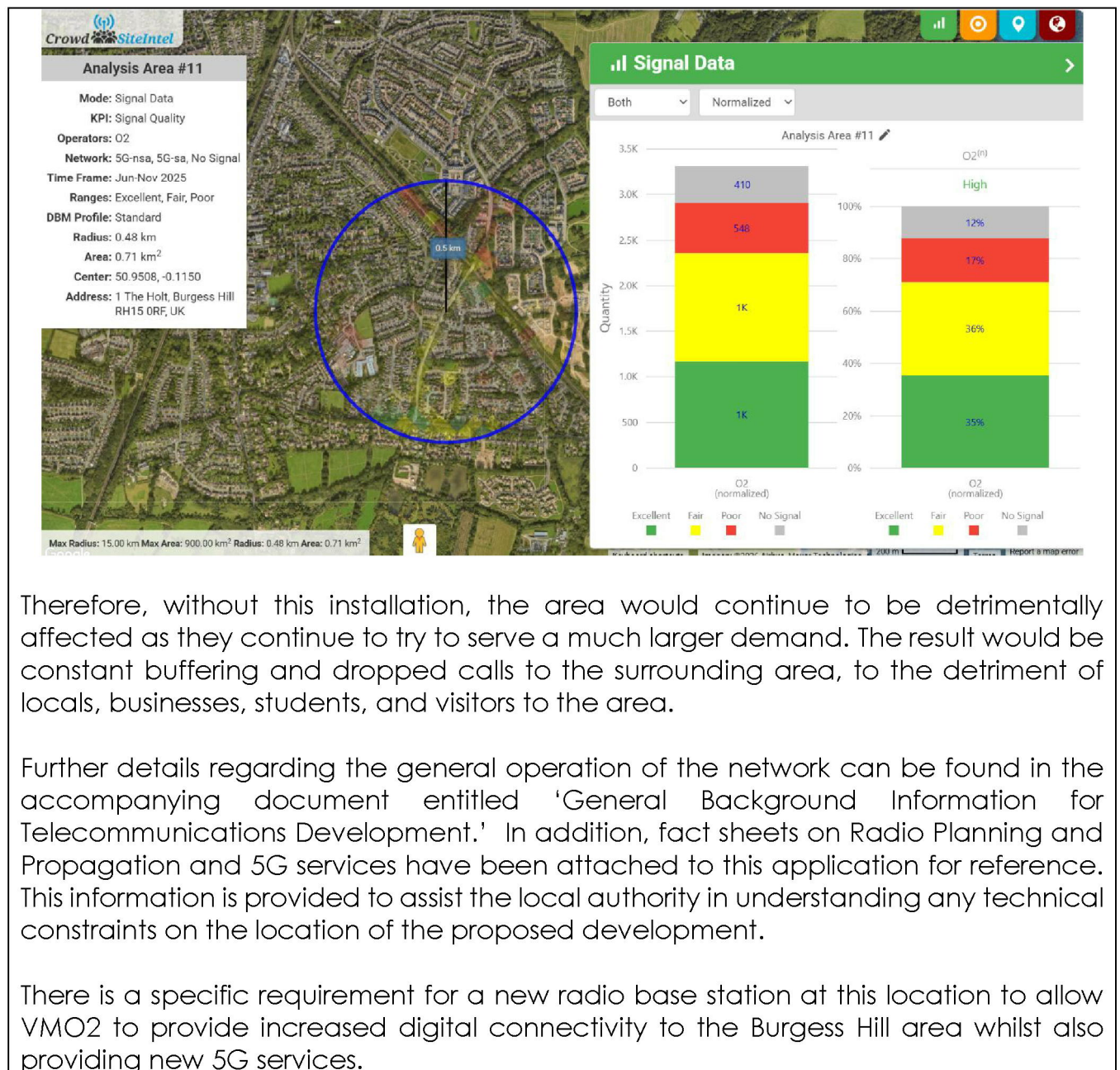
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Therefore, without this installation, the area would continue to be detrimentally affected as they continue to try to serve a much larger demand. The result would be constant buffering and dropped calls to the surrounding area, to the detriment of locals, businesses, students, and visitors to the area.

Further details regarding the general operation of the network can be found in the accompanying document entitled 'General Background Information for Telecommunications Development.' In addition, fact sheets on Radio Planning and Propagation and 5G services have been attached to this application for reference. This information is provided to assist the local authority in understanding any technical constraints on the location of the proposed development.

There is a specific requirement for a new radio base station at this location to allow VMO2 to provide increased digital connectivity to the Burgess Hill area whilst also providing new 5G services.

## 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)

In accordance with the licence obligations and advice in the National Planning Policy Framework and the Code of Practice in England the applicant's network rollout team

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investigated the following siting and design options using this sequential approach to site selection:

- Upgrading their own existing base stations.
- Using existing telecommunications structures belonging to another communications operator. i.e. Mast and/ or site sharing, co-location.
- Installations on existing high buildings or structures including National Grid pylons.
- Using small scale equipment; and finally.
- Erecting a new ground based mast site – (1st) Camouflaging or disguising equipment. (2nd) A conventional installation e.g. a lattice mast and compound.

The applicant's site selection strategy is to keep the overall environmental impact to a minimum. Utilising existing masts is always progressed where it is technically and legally possible and where it is the local planning authority's preferred environmental solution. New sites are only developed where there are no viable or accessible alternatives, or it is the local planning authority's preferred approach. The feasibility of the acquisition, build and maintenance of the site also needs to be taken into account.

In accordance with the above sequential approach, the proposal is to install a new radio base station in this location to enhance 4G coverage and provide new 5G service provision. Considerable time has passed since the latest application and appeal. The applicant has reviewed the search area and consider this location to be the most suitable from a technical and planning perspective.

| Site Type    | Site name and address                                                                  | National Grid Reference | Reason for not choosing site                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|--------------|----------------------------------------------------------------------------------------|-------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| D1 – Rooftop | Birchwood Grove<br>County Primary School, Birchwood Grove Road, Burgess Hill, RH15 0DP | E: 532238<br>N: 118332  | The building has a pitched roof, in which there is nothing for the apparatus to be securely attached to on a sloping roof as significant steelwork and bracing would be required internally to support the equipment. Attaching telecoms development to the roof would not be possible, it is corrugated iron that is not structurally strong enough to support the weight of the antennas, RRH's, feeder cables and associated steelwork, it may cause the roof to collapse. Simply |

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|--------------|----------------------------------------------------------------------|------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|              |                                                                      |                        | put the building is not suitable from a practical and build perspective given its construction and roof shape.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| D2 - Rooftop | Woodlands Meed College, Birchwood Grove Road, Burgess Hill, RH15 0DP | E: 532140<br>N: 118385 | <p>The building is too low to host a sensitively designed base station, when taking into account its roof shape, overall height, as well as its surrounding context. A rooftop proposal of significant height, weight and massing would be required to meet the operator's technical requirements, in which it is considered that should any such proposal come forward here it will be out of keeping with the host building.</p> <p>Pole mounts on low buildings would need to be significantly taller than the host building to clear the roof top, to be ICNIRP compliant and tall enough to reach the target coverage area. A stub mast would be required to reach the target coverage area but this would need to be of a similar height to the host building. The college is on lower ground compared to the rest of the area with rooftop garden located on the opposite rooftop. To achieve ICNIRP compliance the operator must be certain that access to the antennas is restricted to authorised personnel only. They must also consider if the available antenna heights and orientations will ensure ICNIRP compliance with the host property and surrounding building. In this respect a scheme's siting and appearance, including its overall height must cater for those</p> |

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|------------------|------------------------------------------------|---------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                  |                                                |         | persons that might be present at height, as they must not be able to encroach upon the ICNIRP exclusion zones around each antenna. In this respect an option here was discounted for technical reasons, as ICNIRP exclusion zone compliance would be compromised given the close proximity of the building alongside and the publicly accessible rooftop gardens. Therefore, a site in this location has been discounted.                                                                                                                                                               |
| D3 – Streetworks | Footway Burdocks Drive, Burgess Hill, RH15 0HJ | Various | There are houses fronting both sides of this road the pavements are narrow and there are regular driveways and pathways for some of the properties. Given the purely residential setting there are no opportunities to site a streetworks style proposal on Burdocks Drive as on balance any scheme would compromise pedestrian movements, access arrangements to properties and impact on highway safety. In comparison, the chosen site benefits from being on a location whereby it is away from residential frontages, on a grassed verge to minimise the impact on highway safety. |
| D4 – Streetworks | Footways of The Warren, Burgess Hill, RH15 0DZ | Various | There are houses fronting both sides of this road the pavements are narrow and there are regular driveways and pathways for some of the properties. Given the purely residential setting there are no opportunities to site a streetworks style proposal on The Warren as on balance any scheme would compromise pedestrian                                                                                                                                                                                                                                                             |

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|------------------|-----------------------------------------------------|------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                  |                                                     |                        | movements, access arrangements to properties and impact on highway safety. In comparison, the chosen site benefits from being on a location whereby it is away from residential frontages, on a grassed verge to minimise the impact on highway safety.                                                                                                                                                                                                                                                                                                                               |
| D5 – Streetworks | Footway of Badgers Walk, Burgess Hill, RH15 0AE     | Various                | There are houses fronting both sides of this road the pavements are narrow and there are regular driveways and pathways for some of the properties. Given the purely residential setting there are no opportunities to site a streetworks style proposal on Badgers Walk as on balance any scheme would compromise pedestrian movements, access arrangements to properties and impact on highway safety. In comparison, the chosen site benefits from being on a location whereby it is away from residential frontages, on a grassed verge to minimise the impact on highway safety. |
| D6 – Greenfield  | Land at Folders Meadow Park, Burgess Hill, RH15 0NA | E: 532134<br>N: 118207 | Given the height and maturity of the trees found next to this site, this natural clutter would prevent the effective propagation of radio signals towards the target area. The underside of the antenna would need to be clear of the tree line (see paragraph 39 of the Code of Practice) in order to work effectively. The trees on the eastern side of the park are subject to a tree protection order (ref: 1659184 / 1659185), therefore these should be avoided for lopping.                                                                                                    |

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|---------------------|------------------------------------------------------------------|------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| D7 –<br>Streetworks | Grassed verge<br>Folders Lane, Burgess<br>Hill, RH15 0DX         | E: 532463<br>N: 118109 | An application by VMO2 for a 15m<br>monopole (LPA Ref.: -DM/17/1309)<br>was refused by the Council and<br>an appeal (Ref.: -<br>APP/D3830/W/17/3178802) was<br>subsequently dismissed by the<br>Planning Inspectorate on the<br>grounds of the location being an<br>area of Townscape Value, the<br>openness of the area, significantly<br>higher than other existing<br>infrastructure, harming the<br>appearance of the locality etc.<br>Considering this planning history<br>this locality was avoided.                   |
| D8 –<br>Streetworks | Grassed verge of<br>Kings Way, Burgess<br>Hill, RH15 0EA         | E: 532566<br>N: 118616 | An application by VMO2 for a 15m<br>monopole (LPA Ref.: -<br>DM/18/3924) was refused by the<br>Council and it was considered<br>unacceptable due to mast being<br>significantly taller than adjacent<br>street furniture and harmful to<br>streetscene. Considering this<br>planning history this locality was<br>avoided.                                                                                                                                                                                                   |
| D9 –<br>Streetworks | Grassed verge of<br>Marlborough Drive,<br>Burgess Hill, RH15 0EU | E: 532435<br>N: 118704 | There are houses fronting both<br>sides of this grass verge. There are<br>regular driveways and pathways<br>opposite. Given the purely<br>residential setting there are no<br>opportunities to site a streetworks<br>style proposal on Marlborough<br>Drive as on balance any scheme<br>would compromise the immediate<br>views. In comparison, the chosen<br>site benefits from being on a<br>location whereby it is away from<br>residential frontages, on a grassed<br>verge to minimise the impact on<br>highway safety. |

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|----------------------|-------------------------------------------------------------------|------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| D10 –<br>Streetworks | Grassed verge<br>Folders Lane East,<br>Lewes, RH15 OSD            | E: 533178<br>N: 118050 | Although a more favourable option this will not fulfil the coverage and capacity issues of the target area as a whole. As can be seen with the coverage plots, the area currently experiencing the coverage issues is the residential area, therefore, to provide 360 degree coverage it needs to be close to its demand. A site in this location would mean only one out of three sectors would provide coverage into the target area. This would lead to a poor user experience with dropped calls and buffering issues. This would be unacceptable to the operator and not viable. Therefore, this site has to be discounted as it does not meet operator's technical requirements and the need for another mast elsewhere to make up for the gap in coverage will still be needed leading to a proliferation of masts. |
| D11 –<br>Rooftop     | The Tower House,<br>Silverdale Road,<br>Burgess Hill, RH15<br>OEQ | E: 531786<br>N: 118761 | This location is too far removed from the search area to provide the required level of coverage and capacity in the target coverage area. Thus, an additional base station would be required which would lead to the proliferation of masts contrary to NPPF. It would cause overlapping of coverage due to the existing site located at the rooftop Heath Designs, Station Road. Therefore, this site has to be discounted as it does not meet operator's technical requirements and the need for another mast elsewhere to make up for the gap in coverage will still be needed.                                                                                                                                                                                                                                         |

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| D12 –<br>Greenfield  | Car Park for Woodlands Meed College, Birchwood Grove Road, Burgess Hill, RH15 0DP | E: 532116<br>N: 118402 | Given the site's existing use as a car park for the college, where space is limited anyways with frequent vehicle movements and access arrangements, there is no practical space available to accommodate a ground-based installation of the nature and footprint required. A compound would be required to secure the site which would take up car parking spaces used by the staff and pupils of the college with no other off-street parking in this location. Therefore, a site in this location has been discounted. |
| D13 –<br>Greenfield  | Land at Wheelwright Lane Park, Burgess Hill, RH15 0QA                             | E: 532775<br>N: 118363 | The identified site has no permanent access nor can a viable route to site be identified. Therefore, even if this site obtained planning it has to be discounted as it cannot be accessed for build, any major upgrade works and maintenance purposes. The monopole would need a cherry picker to reach the antennas. This is seen as impractical and was discounted for this reason.                                                                                                                                     |
| D14 –<br>Streetworks | Grassed verge of Wykeham Way, Burgess Hill, RH15 0HF                              | E: 532210<br>N: 118584 | There are houses fronting both sides of these roads, the pavements are narrow and there are regular driveways and pathways for some of the properties. Given the purely residential setting there are no opportunities to site a streetworks style proposal on Wykeham Way as, on balance, any scheme would compromise pedestrian movements, access arrangements to properties and impact on highway safety. In comparison, the                                                                                           |

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|-------------------|----------------------------------------------------|---------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                   |                                                    |         | chosen site benefits from being on a location whereby it is away from residential frontages, on a grassed verge to minimise the impact on highway safety.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| D15 – Streetworks | Footway of Glendale Road, Burgess Hill, RH15 0EJ   | Various | There is insufficient space available on this stretch of pavement as the siting and dimensions of a streetworks style mast and its associated equipment cabinets, would restrict pedestrian movements to unacceptable levels and may result in them stepping into the carriageway. Therefore, a site here was discounted as it would lead to highway safety concerns. This is also within the Silverdale Road and Birchwood Grove Road Conservation area in which Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 of the Act emphasises that special attention should be given to the desirability of preserving or enhancing the character and appearance of the relevant Conservation Area. It is felt that on balance the site and proposal put forward is a more appropriate option to pursue rather than one within the Conservation Area. |
| D16 – Streetworks | Footway of Silverdale Road, Burgess Hill, RH15 0ED | Various | There is insufficient space available on this stretch of pavement as the siting and dimensions of a streetworks style mast and its associated equipment cabinets, would restrict pedestrian movements to unacceptable levels and may result in them stepping into the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

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|-------------------|---------------------------------------------------|---------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                   |                                                   |         | <p>carriageway. Therefore, a site here was discounted as it would lead to highway safety concerns. This is also within the Silverdale Road and Birchwood Grove Road Conservation area in which Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 of the Act emphasises that special attention should be given to the desirability of preserving or enhancing the character and appearance of the relevant Conservation Area. It is felt that on balance the site and proposal put forward is a more appropriate option to pursue rather than one within the Conservation Area.</p>                                                                                                                                 |
| D17 - Streetworks | Footway of Sycamore Drive, Burgess Hill, RH15 0GH | Various | <p>A proposal here would be directly in front of residential frontages whereby there would be little separation distance between the monopole and the frontages. In addition, a radio base station cannot be installed within 50m of a live railway line due to installation and mast maintenance reasons as the line needs to be closed for such works to be carried out which would detrimentally affect users of the railway network. In comparison, the proposal benefits from being away from any residential frontages and a sufficient distance from the nearest property, it is also well away from any railway networks to be safely built and maintained. Therefore, a site in this location has been discounted for these reasons.</p> |

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|                      |                                                                                            |                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|----------------------|--------------------------------------------------------------------------------------------|------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| D18 -<br>Streetworks | Footway of Winkhurst Way, Burgess Hill, RH15 0RU                                           | Various                | There are houses fronting both sides of this road the pavements are narrow and there are regular driveways and pathways for some of the properties. Given the purely residential setting there are no opportunities to site a streetworks style proposal on Badgers Walk as on balance any scheme would compromise pedestrian movements, access arrangements to properties and impact on highway safety. In comparison, the chosen site benefits from being on a location whereby it is away from residential frontages, on a grassed verge to minimise the impact on highway safety. |
| D19 -<br>Streetworks | Footway of Titchfield Close, Burgess Hill, RH15 0RX                                        | Various                | There are houses fronting both sides of this road the pavements are narrow and there are regular driveways and pathways for some of the properties. Given the purely residential setting there are no opportunities to site a streetworks style proposal on Badgers Walk as on balance any scheme would compromise pedestrian movements, access arrangements to properties and impact on highway safety. In comparison, the chosen site benefits from being on a location whereby it is away from residential frontages, on a grassed verge to minimise the impact on highway safety. |
| D20 -<br>Streetworks | Grassed verge of Barnside Avenue, Burgess Hill, Mid Sussex, West Sussex, England, RH15 0JU | E: 532513<br>N: 118300 | There is a drain away ditched directly behind the grassed verge providing a soakaway from surface water leading to a sewer to the east. A site in this location would compromise both the                                                                                                                                                                                                                                                                                                                                                                                             |

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|                   |                                                                               |                        |                                                                                                                                                                                                                                                                                                                                  |
|-------------------|-------------------------------------------------------------------------------|------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                   |                                                                               |                        | soakaway and the masts structural capabilities due to the requirement for solid ground conditions to support the root foundation of the mast. In comparison, the proposed location benefits from being on flat land and suitable to host a monopole safely. Therefore, a site in this location has been discounted.              |
| D21 - Streetworks | Land at Unicorn Way, Burgess Hill, Mid Sussex, West Sussex, England, RH15 0YR | Various                | The site provider has aspirations to redevelop site for 237 residential dwellings (LPA Ref.: - DM/20/0886), therefore, this location is discounted, as it is not available. Once complete there will be houses fronting both sides of the road, with frequent driveways and access, therefore a site would not be possible here. |
| D22 – Greenfield  | Land at Willowhurst, Burgess Hill, Mid Sussex, RH15 0FX                       | E: 532330<br>N: 118007 | The site provider has aspirations to redevelop site for 237 residential dwellings (LPA Ref.: - DM/22/3049), therefore, this location is discounted, as it is not available. Once complete there will be houses fronting both sides of the road, with frequent driveways and access, therefore a site would not be possible here. |

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Map 2. of Discounted Sites

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

N/A

Land use planning designations:

Silverdale and Birchwood Grove Conservation area approx. 450m to the West.

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

### National Planning Guidance

Planning policy is provided at the national level by the National Planning Policy Framework (NPPF). It is a material consideration in planning decisions.

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It is not necessary to quote extensively from this document, but the following points are highlighted.

### **National Planning Policy Framework (December 2024)**

The Government's National Planning Policy Framework (NPPF) was published on 24 July 2018 and updates the 2012 version. In February 2019 the NPPF was revised again, with minor alterations to wording relating to housing supply and not any parts relating to telecommunications. The NPPF was updated in July 2021, in order to strengthen sections including requirements on improved design quality, a new requirement for Councils to produce local design codes or guides, an emphasis on using trees in new developments, revised policies on plan-making, removing statues and opting out of PD rights relating to residential conversions. The NPPF has been revised again in December 2023, however, it did not affect any parts relating to telecommunications.

The Government's latest thinking continues to strongly support communications infrastructure. The NPPF remains very supportive of high-quality communications. Indeed, a whole chapter is dedicated to high quality communications, emphasising the importance that the Government attaches to digital connectivity. Paragraph 118 states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. This wording echoes guidance set out in paragraph 42 of the 2012 version of NPPF. However, it also includes the importance of reliable communications infrastructure for both economic growth and social well-being.

The NPPF continues to support the expansion of electronic communications networks at paragraph 119. It notes that policies should set out how high-quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time. The economic and social benefits of providing high quality and reliable communications infrastructure are well documented and can be found later in this Supporting Information Statement.

The NPPF makes reference to 5G:

*'Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) ...'*

With the above in mind, the Government is already forward thinking the evolution of data networks and seeks planning decisions to take account of this. 5G technology provides increased speed of data and more capacity in the network, to ensure that handheld devices can continue to be used for the purposes in which they were purchased. This will bring even greater economic and social benefits to the area.

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Paragraph 120 of the NPPF retains the requirement to minimise the number of installations consistent with the efficient operation of the network but also includes being consistent with the needs of consumers and providing reasonable capacity for future expansion.

Paragraph 123 of the NPPF retains the guidance set out in paragraph 46 of the 2012 NPPF version which relates to determining applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.

At the heart of the NPPF is the retained presumption in favour of sustainable development (para 11). For decision-taking this means approving development proposals that accord with an up-to-date development plan without delay or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless the application of policies within the revised Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed or any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the revised Framework taken as a whole.

The NPPF continues to provide guidance on decision-making. At paragraph 39 it states that:

*'Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including...permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible'.*

The NPPF builds on the aspiration to build a strong, competitive economy. Chapter 6 of the NPPF relates to 'Building a Strong, Competitive Economy' and refers specifically to 'Digital Infrastructure'. Paragraph 85 states:

*'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking in to account both local business needs and wider opportunities for development. The approach taken, should allow each area to build on its strengths, counter*

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*any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation'...*

Footnote 43 of the NPPF states:

*'...The UK's Modern Industrial Strategy identifies priority sectors for growth and support as: advanced manufacturing; clean energy industries; defence industries; digital and technology businesses; financial services; life sciences; and professional and business services.'*

### **Code of Practice for Wireless Network Development in England (March 2022)**

The Code of Practice 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 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 aim of the Code of Practice is 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.

The Code of Practice covers all forms of wireless infrastructure development, including mobile masts and cabinets. It is recommended that other wireless communications operators follow the principles of this Code of Practice, where appropriate.

Unlike previous iterations this Code of Practice has been led by the Department for Digital, Culture, Media and Sport (DCMS) and developed in collaboration with representatives of the mobile network industry, other government departments and public bodies, local planning authorities, and protected landscapes. This document replaces the previous Code of Practice on Mobile Network Development, which was published in 2016 and is now published by DCMS.

The CoP sets out the legal and policy framework for the delivery of wireless infrastructure development.

Paragraph 8 of the revised Code acknowledges that connectivity is vital to enable people to stay connected and that fast, reliable digital connectivity can deliver economic, social and well-being benefits for the whole of the UK. The Code continues to acknowledge that as the demand for mobile data in the United

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Kingdom is increasing rapidly, and that it is important that everyone has access to dependable and consistent mobile coverage where they live, work and travel.

The Government recognises the role of Planning in delivering the digital infrastructure that we need, in a sustainable and well-designed way, especially as households and businesses become increasingly reliant on mobile connectivity.

Paragraph 13 of the Code continues to echo the NPPF guidance in strongly supporting high quality communications infrastructure, which is seen as essential for sustainable economic growth. More specifically that planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technologies (such as 5G) in order to support economic growth across the country.

The CoP sets out 'How wireless networks function.

*Para. 16 states "Cellular wireless networks use base stations to provide an area of radio coverage. Wireless technology uses the radio spectrum to broadcast radio waves between base stations and devices. Different radio frequencies have different characteristics which, along with the density of cell site locations, affect the extent of coverage and how much data can be carried over the network. Depending on the radio frequencies used, base stations can deliver coverage over a wide area or provide extra network capacity in areas where there is a high demand for network bandwidth".*

*Para. 17 sets out 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".*

The CoP establishes 'Principles and commitments' by which operators should develop their networks and that Local Planning Authorities should demonstrate their support by.

*Para. 18 states "Operators should develop their networks and install wireless infrastructure according to the following principles and commitments:*

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- **Site sharing and use of existing infrastructure:** make use of existing structures, sites and masts wherever possible to reduce the need for new development. The NPPF states that, when installing mobile infrastructure, the number of masts and sites should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion.
- **Consultation with local planning authorities, local communities and other stakeholders:** participate in dialogue with local planning authorities, along with other relevant stakeholders such as the highways authorities, Area of Outstanding Natural Beauty bodies, Historic England, and Natural England, including pre-application discussions, where appropriate. Maintain clear procedures, and high quality communication and consultation with local communities and other interested parties. Operators should agree community engagement with local planning authorities and share information as appropriate (see Pre-application consultation with local communities below).
- **Standardised and high-quality approach to planning applications, and the notification procedure:** provide standardised supporting documentation for planning applications (where appropriate) 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 19 states that Local Planning Authorities should demonstrate their support by:

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- **"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)".

The added emphasis on support from Local Planning Authorities in the deployment in digital infrastructure is even more evident in the revised CoP. The CoP recognises the importance of collaboration and partnership to help drive network coverage across the country. It goes on to state that *'In all instances, it is important for all parties involved in the process to take a positive approach to consultation and engagement'*.

### Siting and Design Principles

The government's objective is to deliver high quality, reliable wireless infrastructure whilst ensuring the impact of new network development is kept to a minimum. The siting and design of wireless network infrastructure is central to achieving this. The CoP acknowledges that *'good siting and design principles should apply to all wireless network development and take into account any site specific considerations and context. Both can create better places in which to live and work and help make development acceptable to communities'*.

The Code provides guidance on siting and appearance principles. It sets out several design principles in respect of telecommunications development and acknowledges that the options for design used by an operator will be affected by site conditions including requirements to link the site to the network, landscape features and coverage and capacity requirements. The guidance includes at Para. 22 *'the choice over the site selection and design of equipment is primarily dependent upon the coverage and capacity requirements and technical constraints of a specific location, although operators should make efforts to reduce visual impacts where possible'*.

Para. 23 confirms that there should be a **'presumption in favour of facilitating sustainable network development'** and, as such, operators and local planning

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authorities, as well as all other bodies involved in the deployment process, should work together to ensure connectivity needs are met and find viable solutions to deployment issues (emphasis added).

Paragraphs 24 - 27 sets out general siting and site selection principles which Operators should consider. The CoP acknowledges at Para. 24 that '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'.

Para 25 notes that '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 and structures;
- Erecting new ground based masts;
- Camouflaging or disguising equipment where appropriate;
- Using small scale equipment (although small cells themselves are generally used to address capacity issues as opposed to providing coverage); and
- Mast and/or site sharing (including redevelopment of a site to enable upgrade or sharing with another operator) '.

Para. 26 highlights that 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. 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.

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- **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.

Para 27 requires that Local Planning Authorities consider these issues and consider the need for a site within a limited search area alongside the public benefit of improved connectivity. Para. 27 further considers that 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. In respect of 'Design', the CoP at Para 28 acknowledges that the siting of wireless infrastructure will influence which design options are most appropriate for reducing the visual impact including

- **Protecting visual amenity**
- **Mitigating visual impacts**

Para. 29 acknowledges that these factors along with location and the coverage and capacity requirements can influence the type of infrastructure structure that is deployed and requires that *'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 are likely to need to be deployed more densely. In these settings you can expect to see more use of streetwork monopoles and rooftop installations, and, in future, we are likely to see a larger number of smaller units (so-called "small cells") deployed on buildings and on street furniture.*
- *In rural areas, base stations often need to cover wider geographic areas. Operators may need to use tall masts or lattice towers to provide the required coverage. The location of masts can sometimes be dictated by access to transmission links back to the operator's main network and proximity to a power supply. Coverage in some areas can be limited because of the geography, topography and terrain'.*

The CoP establishes radio equipment housing (cabinets) principles. The CoP at Para. 30 states that *"cabinets protect radio transmitters and receivers, provide the power source for mobile equipment, and are connected to antennas via cables. Equipment cabinets are likely to be needed at most sites. The cabinets must be of sufficient size to facilitate hosting various operating equipment whilst also allowing air circulation to reduce the potential for overheating"*. The CoP establishes the planning and visual considerations for siting radio housing. These include:

- **Colouring**

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- Siting on highways and footways:
- Highway safety:
- Listed buildings/ scheduled monuments and Conservation Areas:
- Access
- Trees

The CoP explains the planning and visual considerations an operator should aim towards when siting a new mast, including the information referenced above:

Paragraph 39 of the CoP refers to mast positioning:

*'All new masts should be sited, so far as is practicable, so as to minimise their impact on their setting, including the landscape and any buildings. This includes sitting next to similar structures - streetworks masts, for example, should ideally be sited in line, and in harmony, with existing vertical infrastructure, such as street lighting columns, to minimise their visual impact. Placing a mast within or adjacent to an existing group of trees, vegetation and other natural features can reduce visual impact. Care should be taken to minimise the unnecessary loss of existing trees, though antennas will need to be sufficiently elevated to clear the treeline and the trees may need to be maintained to prevent growth above a certain level'*

Paragraph 40 refers to colouring and camouflage of the mast:

*'Where appropriate, masts should be coloured to match their backdrop to minimise contrast in an urban or rural setting. Streetworks monopoles can utilise design features such as shrouding or banding to protect visual amenity, though, for some 5G infrastructure, camouflage design solutions may not be practicable. Simple designs should be encouraged - masts which have complex designs are more likely to dominate and be in discord with the landscape and have adverse visual impacts. Operators and planning authorities should work collaboratively to agree on the optimal design solution on a site-specific basis'.*

## Local Policy

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that "If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise".

## Mid Sussex District Plan 2014 – 2031 (Adopted March 2018)

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The Plan is based on the vision for the District set out in the 'Mid Sussex Sustainable Communities Strategy' (originally published in 2008 and refreshed in 2012):

*"A thriving and attractive District, a desirable place to live, work and visit. Our aim is to maintain, and where possible, improve the social, economic and environmental well-being of our District and the quality of life for all, now and in the future."*

The following strategic objectives are relevant:

6) To ensure that development is accompanied by the necessary infrastructure in the right place at the right time that supports development and sustainable communities. This includes the provision of efficient and sustainable transport networks;

7) To promote a place which is attractive to a full range of businesses, and where local enterprise thrives; and

8) To provide opportunities for people to live and work within their communities, reducing the need for commuting.

#### DP23: Communication Infrastructure

The District Plan supports improved digital connectivity, including the provision of high-speed broadband and 4G across the District, due to the benefits that it will bring to both business and residents in the District.

In accordance with the National Planning Policy Framework (paragraph 43), the District Plan supports the expansion of electronic communications networks and infrastructure, currently including high speed broadband and 4G.

The Council will encourage the incorporation of digital infrastructure including fibre to premises, in major new housing, employment and retail development.<sup>12</sup> The expansion of the electronic communication network to the towns and rural areas of the District will be supported. When considering proposals for new telecommunication equipment the following criteria will be taken into account:

- The location and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area. On buildings, apparatus and associated structures should be located and designed in order to seek to minimise impact to the external appearance of the host building;
- New telecommunication equipment should not have an unacceptable effect on sensitive areas, including areas of ecological interest, areas of landscape

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importance, Areas of Outstanding Natural Beauty, the South Downs National Park, archaeological sites, conservation areas or buildings of architectural or historic interest and should be sensitively designed and sited to avoid damage to the local landscape character;

- Preference will be for use to be made of existing sites rather than the provision of new sites.

When considering applications for telecommunications development, regard will be given to the operational requirements of telecommunications networks and the technical limitations of the technology.

#### DP26: Character and Design

All development and surrounding spaces, including alterations and extensions to existing buildings and replacement dwellings, will be well designed and reflect the distinctive character of the towns and villages while being sensitive to the countryside. All applicants will be required to demonstrate that development:

- is of high quality design and layout and includes appropriate landscaping and greenspace;
- contributes positively to, and clearly defines, public and private realms and should normally be designed with active building frontages facing streets and public open spaces to animate and provide natural surveillance;
- creates a sense of place while addressing the character and scale of the surrounding buildings and landscape;
- protects open spaces, trees and gardens that contribute to the character of the area;
- protects valued townscapes and the separate identity and character of towns and villages;
- does not cause significant harm to the amenities of existing nearby residents and future occupants of new dwellings, including taking account of the impact on privacy, outlook, daylight and sunlight, and noise, air and light pollution (see Policy DP29);
- creates a pedestrian-friendly layout that is safe, well connected, legible and accessible;
- incorporates well integrated parking that does not dominate the street environment, particularly where high density housing is proposed;
- positively addresses sustainability considerations in the layout and the building design;

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- take the opportunity to encourage community interaction by creating layouts with a strong neighbourhood focus/centre; larger (300+ unit) scheme will also normally be expected to incorporate a mixed use element;
- optimises the potential of the site to accommodate development.

### **West Sussex Digital Infrastructure Strategy**

As connectivity becomes increasingly important to us all it is vital that it is underpinned by scalable, resilient and sustainable digital infrastructure. West Sussex County Council, together with the county's District and Borough councils<sup>1</sup> recognise the importance of high quality, accessible and affordable digital infrastructure in supporting the county's resilience, enabling sustainable growth and responding to environmental challenges.

We will continue to improve connectivity in the hardest to reach areas in addition to Government's national Project Gigabit, targeted with reaching 99% of UK premises with gigabit capable connectivity by 2030

We will work more closely with private sector investors and private enterprise to accelerate the development and deployment of private networks and technologies that can make a positive impact to lives and places in West Sussex as well as our economy.

We will build a "regional" digital infrastructure approach where connectivity can leverage additional benefits for the region across county boundaries, enabling our region's infrastructure to become more than the sum of its parts.

### Technology Themes

Our digital infrastructure strategy puts fibre and mobile connectivity front and centre. Businesses require reliability, speed and resilience in order to grow and full fibre and 5G are widely heralded as the future proof technologies with the potential to develop innovative new technologies that can transform productivity, make significant advances in transport and health care, and support action on climate change.

The technology themes are:

1. Regional connectivity - e.g. spines for backhaul; open access dark fibre and duct; point to point/multipoint secure dark fibre for collaboration, innovation
2. Local connectivity (access networks<sup>6</sup>) to premises e.g. Full Fibre, Gigabit capable (1000Mbps), and Superfast Broadband >30 Mbps;

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3. Mobile connectivity – e.g. wireless technologies such as 4G; 5G small cell networks; macro sites; satellite, fixed wireless access etc
4. IoT (Internet of Things) - connectivity for sensor networks, machine to machine (M2M) communications underpinning 'Smart Places'.

SP1: Enable future-ready infrastructure that will support our diverse economy and stimulate growth and innovation

We will do this by:

Removing barriers to accelerate the provision of backhaul, fixed and wireless access networks through making available open access public sector infrastructure, shared and no dig opportunities, supporting business parks to access high quality fibre connectivity including dark fibre where appropriate, e.g. by aggregating demand, adopting a multi-connectivity “connected spaces” approach, making publicly owned assets available for telecommunications infrastructure.

SP2: Enable the creation of connected places, unlocking value for communities, businesses, public services, researchers and the environment

We will do this by:

Working with mobile network operators (MNOs) to encourage deployment of private and public mobile infrastructure to support mobile phone coverage and IOT/5G applications

SP3: Improve access to connectivity in hard-to-reach areas, reducing the digital divide and unlocking the potential of our rural economy

We will do this by:

Working with the telecoms market to accelerate commercial investment in both fixed and wireless infrastructure by making public assets available and facilitating access to private land to benefit community projects

## **Mid Sussex Economic Development Strategy 2018 - 2031**

### 5. Strategic priority: Place

Our objectives are to:

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Provide high quality digital infrastructure and mobile connectivity. In particular the extension of high-speed broadband to support the development and growth of rural businesses

### **Connected Nations 2025 Report (November 2025)**

Connected Nations is an annual report on progress in the availability of broadband and mobile services in the UK, including the roll out of mobile 5G networks. The 2025 report was published in November 2025. These reports support Ofcom's objective of making communications work for everyone, including to promote reliable, widely available, and high-quality networks. The latest report found that the availability of 5G services is continuing to grow rapidly. The level of 5G coverage provided outside of premises by at least one mobile network operator (MNO) is now between 94% and 97%. 4G coverage now reaches 96% of the UK landmass outdoors from at least one MNO.

For the first time the Connected Nations report supplied information on 5G standalone coverage (5G SA) which is now available across 83% of areas outside of premises in the UK for at least one MNO.

Two MNOs have completed their 3G switch-off and all operators have committed to retiring their 2G networks by 2033 at the latest.

Whilst 4G coverage now reaches 96% of geographic landmass, 4G is in a slow user decline. It still remains the most used mobile technology, however the report notes its down by 6 percentage points from 2024, indicating a shift towards 5G.

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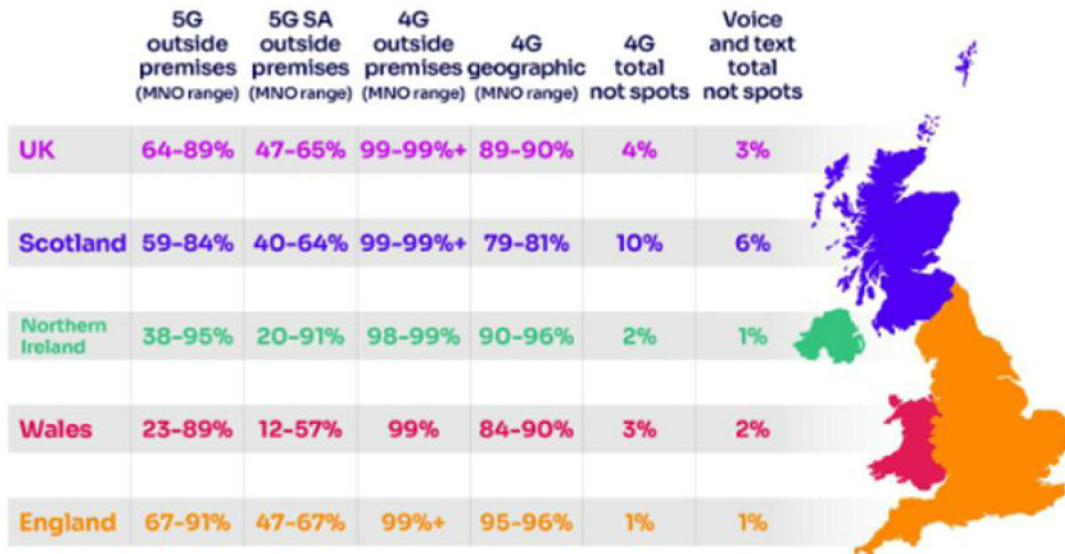
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Figure 3.1: Overview of voice and data coverage across the UK and UK nations <sup>37</sup>



Source: Ofcom analysis of MNO data (July 2025)

The footprint where all MNOs provide 5G coverage remains considerably lower. However, the Connected Nations 2025 report notes the shift towards 5G standalone, with 5G SA coverage from at least one MNO reaching 83% at the High Confidence level and 74% at the Very High Confidence level in areas outside of premises, and reported 5G SA deployments accounting for approximately 41% of all 5G sites.

The rollout of full 5G (SA) is important because it enables more advanced features (lower latency, higher capacity) beyond the “non-standalone” 5G that uses 4G core networks. The report highlights this as a key infrastructure step.

There is gradual progress in geographic 5G coverage, however the report notes this is at a moderate pace. As of 2025, overall 5G coverage across the UK geography stands at 65% at the High Confidence level and 54% at the Very High Confidence level - up from 60% and 48%, respectively, in the previous year.

Indoor coverage continues to be widely available, there are certain factors that impact the level of indoor coverage people are able to access, including: wall thickness, building materials used in construction and where in a building people are using their phone. Indoor coverage is notably lower in rural areas, compared to urban areas.

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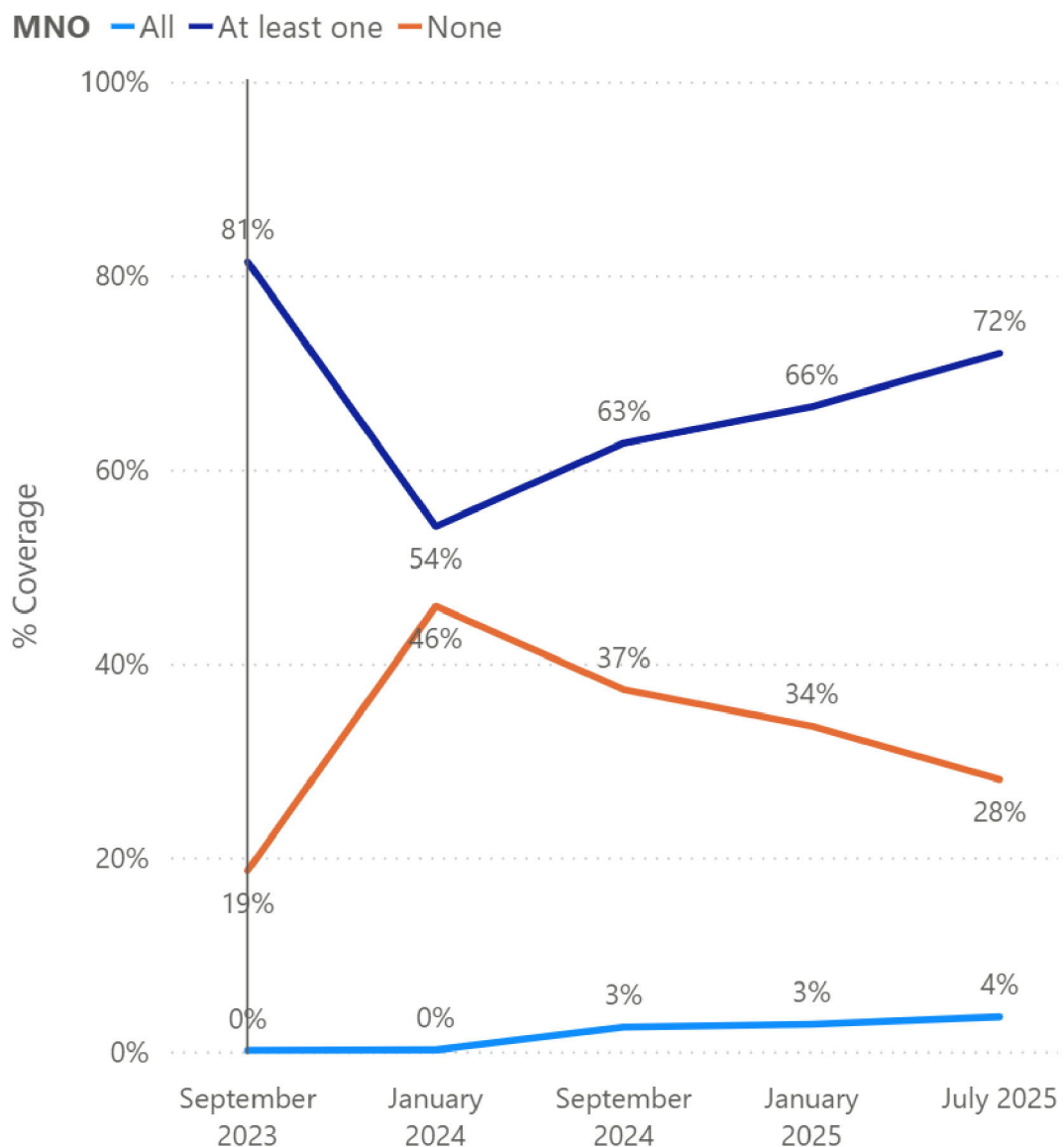
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Although coverage figures are high, coverage is only one part of service quality. The report and commentary note that the rollout of advanced 5G (SA) is still ongoing and that some areas (especially rural) still rely on older infrastructure.

The Connected Nations 2025 report also contains an updated interactive map which shows mobile coverage for the local authorities throughout the UK. The below figures show the coverage of landmass, premises and roads by mobile networks for voice, data for 5G (with a High Confidence, and Very High Confidence). The line charts below show coverage over time since May 2022 in relation to 5G coverage at both high confidence and very high confidence levels in Mid Sussex.



**Figure 4. 5G coverage at a high confidence level in Mid Sussex**

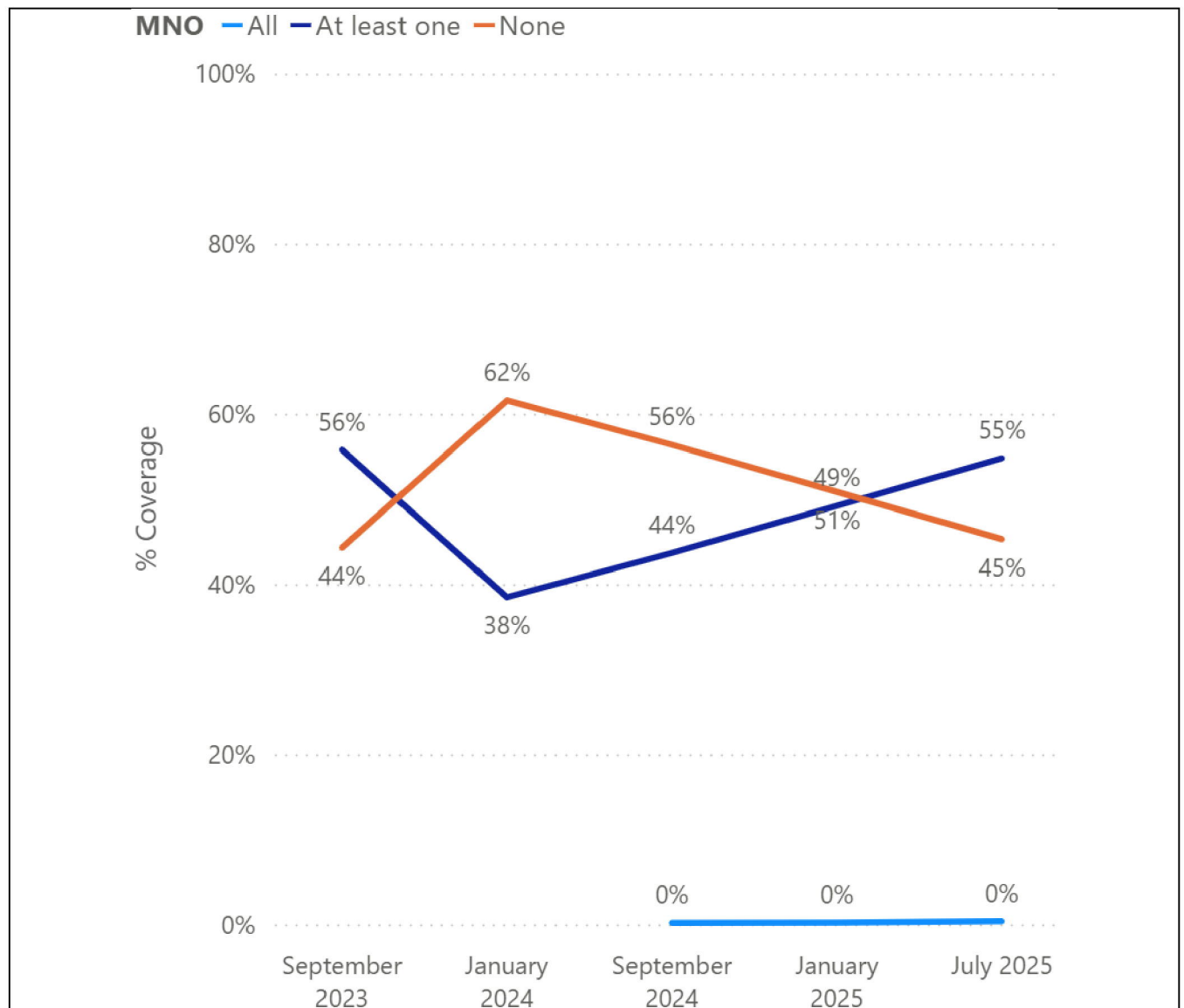
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**Figure 5. 5G coverage at a very high confidence level in Mid Sussex**

As shown in the figures above, 72% of the Mid Sussex area has access to 5G at a high confidence level from at least one operator, and 55% has access at a very high confidence level. However, these figures drop significantly to 4% and 0% respectively when considering 5G provision from all four main mobile operators. The proposed radio base station will help improve digital connectivity in the surrounding area by enhancing 2G and 4G coverage and capacity, and by providing new 5G coverage.

### UK Wireless Infrastructure Strategy (April 2023)

The UK Wireless Infrastructure Strategy, published in April 2023 aims to achieve the objectives that have been set out by the UK Government. The next decade will see

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seismic changes both in terms of what wireless connectivity can deliver and how we can use it. The economic and social benefits from these changes promise to be vast, from supercharging growth to accelerating our transition to net zero. But these benefits can only be achieved with concerted action from government, industry, and others. This strategy sets out the Government plan to do that.

In the last 5 years, UK government policies have driven impressive progress in the deployment of world class fixed and wireless networks across the whole of the UK, removing regulatory and practical barriers to deliver stronger growth, more jobs, and better public services in every corner of the country.

- through our £1 billion deal with the mobile network operators, we are supporting rural communities by ensuring that 95% of the UK landmass have 4G coverage by 2025. This currently stands at 92%
- we have made substantial progress with 5G, too. Last year, we met our ambition for the majority of the population to have access to a 5G signal by 2027 5 years early through the deployment of basic, non-standalone 5G using existing 4G networks to deliver increased network capacity.

By building world-class, secure digital infrastructure networks, the Government can meet its vision they set out in their Digital Strategy for a competitive and innovative digital economy. This will play an important role in:

- **underpinning other new technologies** - the next decade will see the development and maturation of transformative technologies from AI and self-driving vehicles to digital twins, which will drive demand for advanced wireless connectivity.
- **transforming public services** - there are also significant benefits for improving our public services, supporting smart cities which are cleaner and less congested and delivering connectivity to our schools and hospitals that will provide better, more interactive lessons and personalised healthcare.

By transforming our economy, widespread adoption of 5G can bring a cumulative productivity benefit of £159 billion by 2035, driving growth and inward investment, and improving lives for communities in every corner of the country.

However, there are challenges we need to address to ensure the UK can realise these benefits, as the economics of investing in wireless networks are changing:

- There is still need to overcome uncertain demand for 5G-enabled services and continuing practical barriers to network deployment need to be overcome.
- Many of the economic benefits we have identified require significantly higher quality connectivity than is likely to be deployed in national public networks.

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- 5G roll-out in the near term is likely to focus on urban areas, where the commercial returns are more certain.
- Research we commissioned shows significant variation in the quality of mobile coverage in different parts of the country over the next decade - economically important areas like Freeports and industrial parks could be underserved.

Market dynamics are also changing:

- **Demand is uncertain** as connectivity moves beyond smartphones to enable an array of new, innovative use cases, businesses and the public sector will need to navigate an increasingly complex ecosystem to get the connectivity they require. As many businesses and local authorities do not yet clearly understand the benefits 5G offers or how they can effectively deploy 5G-enabled services to realise these benefits, there is no clear articulation of the demand for higher quality services. In turn, this makes it more challenging for providers to make the business case for investment.

Through this strategy, the UK government set out a new policy framework with 6 key steps to do just that and ensuring that the UK maximises the potential of advanced wireless networks over the next decade, securing our international competitiveness for the future and driving economic growth across the UK.

## 1. Ensuring good connectivity for all

As networks are upgraded with 5G technologies over the next decade, 4G will continue to play an important, albeit diminishing, role in providing mobile connectivity across the UK.

Coverage reporting also needs to improve so that it more accurately reflects consumers' actual experience, equipping them with the information they need to choose the right contract. In turn, we expect this to drive further commercial investment to address previously unidentified gaps - ensuring that people and businesses get the connectivity they need, whether to start and grow a business or to have a remote healthcare appointment.

## 2. Setting a bold 2030 ambition

Given the substantial potential that 5G offers for businesses and public service delivery, we are setting out a bold vision for the next generation of our national networks to galvanise investment across our economy. We want to move beyond the basic 5G that is being deployed now over 4G networks to build higher quality, standalone 5G networks that do not rely on older infrastructure. We also want to

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extend 5G coverage well beyond cities and towns to all populated areas of the UK, including rural villages and communities.

**'We are therefore setting a new headline ambition for the UK to have nationwide coverage of standalone 5G to all populated areas by 2030.'**

### **3. Strengthening the investment climate**

While the government already has a range of policies in place to drive forward the deployment of digital infrastructure, our 2030 ambition requires significant commercial investment.

This includes:

- Continuing to remove practical barriers to the deployment of 5G infrastructure.

### **4. Realising the full benefits of 5G**

We want people, business and public services across the UK to realise the full benefits of 5G and advanced wireless connectivity. However, without concerted action, this will be slow to materialise and limited to larger businesses, in fewer sectors, and in certain geographies.

Supporting places to attract investment: we set out how we will drive greater opportunities for industry and public service providers to be empowered customers for future connectivity solutions – supporting places to attract investment and encouraging adoption of 5G services.

We will do this by:

- Driving local leadership and coordination and encouraging local authorities across the UK to employ digital champions to provide strategic leadership for local authorities' own digital infrastructure strategies.

There are 5 chapters which outline the aims and ambitions, along with the steps the government are going to take in order to achieve their set targets and provide improved 5G connectivity for all.

#### **Chapter 1 - Approach and scope**

This strategy sets out a policy framework to help deliver the government's priority of growing the economy and to ensure the UK benefits from advances in wireless connectivity for the next decade.

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## Chapter 2 – Ensuring good connectivity across rural and urban areas.

The government's priority to build a better, more secure, more prosperous future for the UK includes a clear commitment to grow the economy and create better-paid jobs and opportunity right across the country. To do this, it is vital that people who live and work in all parts of the UK, including in rural areas, have access to good quality mobile and broadband coverage.

## Chapter 3: Our 2030 ambition

World-class digital infrastructure underpins the digital economy – it was worth £143 billion in 2021, accounting for 5% of the national workforce. This infrastructure provides the backbone of the UK economy and society with ever more jobs, public services and societal interactions built upon its foundations. As growth in the digital sector is nearly six times faster than across the economy as a whole, its importance will only continue to increase as we deliver the Prime Minister's priority of growing the economy.

4G technology revolutionised the way people use their mobile phones. What today is considered normal, a decade ago was ground-breaking. We have seen the growth of streaming services, like Netflix and Spotify, and gained constant access to high quality, user-produced content for free on platforms like YouTube, transformed the way we shop online, travel around cities through access to apps like Uber and Bolt and use public services, such as booking NHS appointments through apps.

### The evolution of 5G

While 4G will continue to play an important role in providing widespread geographic connectivity to consumers through public cellular networks across the UK's landmass, 5G can offer significantly better performance and support a far greater range of use cases. 5G enables data transfer speeds of more than 10 times faster than 4G, has the potential to offer lower latency and greater reliability and the ability to connect more devices. The implications of these improvements reach far beyond the potential to develop the capabilities of smartphones, enabling an array of innovative use cases and providing for transformative economic, and social benefits that were perhaps unimaginable a decade ago.

The government's ambition for the majority of the population to have access to a 5G signal by 2027 has been met early through the deployment of basic, or non-stand alone, 5G which is built on a 4G core network. While this has helped MNOs increase the capacity of their networks in more densely populated areas, it does not reflect the full functionality 5G can deliver.

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Without clear action, the market for advanced 5G services will remain nascent as many business and public services do not yet fully understand the benefits or how to navigate the supplier ecosystem for 5G enabled digital products, applications and services.

We want high quality coverage to extend well beyond cities and larger towns to all populated areas of the UK, including villages and rural communities. **We are therefore setting a stretching new ambition of nationwide coverage of standalone 5G to all populated areas of the UK by 2030** (emphasis added).

#### Chapter 4: Strengthening the investment environment.

Our 2030 ambition requires commercial investment, and this chapter focuses on creating the environment to support it.

The deployment of standalone 5G and ultimately advanced will require operators to deploy additional infrastructure, including:

- 5G core networks in addition to the 5G equipment in the radio access network
- upgrades to the existing grid of approximately 18,000 macro cell sites per MNO
- additional cell sites to provide 'infill' to cover gaps in coverage

#### Addressing barriers to deployment

Since the publication of the Future Telecoms Infrastructure Review, the government have taken significant strides to make it quicker and easier for operators to roll out new digital infrastructure including making reforms to the planning system to support the deployment of 5G and extend mobile coverage in England.

#### Chapter 5: Realising the full benefits of 5G and advanced wireless connectivity.

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, but this will only be possible if places across the country can attract

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commercial investment in 5G and other forms of advanced wireless connectivity and for that to be adopted at scale by businesses and public services.

### Connected places

Improving digital connectivity is one of the government's Levelling Up Missions. We want places and communities across the UK to share in the benefits of good connectivity, enriching lives and driving local growth.

We want to support connected places with their digital connectivity ambitions. **We will do this by helping regions and local authorities to build the case for adopting new technology, attracting investment and removing practical barriers to the deployment of advanced wireless networks** (*emphasis added*). Local and regional authorities play a pivotal role in facilitating the rollout of wireless connectivity and their role will become more critical than ever as investment in 5G continues, due to its technological complexity and the vast number of new applications and services it can support.

### Local leadership and coordination

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.

### Chapter 6: Driving adoption in key economic sectors.

Adoption of 5G-enabled use cases in sectors such as healthcare, transport & logistics, manufacturing and agriculture will drive economic growth and productivity across the UK, delivering our priority of economic growth.

Key features of 5G for industry Dedicated 5G networks can enable:

- data analytics: Utilising operational and environmental sensor data to make real time decisions about equipment and operational performance.
- video surveillance and geolocation: Providing the location of workers and assets for security and safety purposes.

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- tracking moving assets: Working with self-driving vehicle technology and software guidance systems to provide situational awareness of mobile assets.
- automation: Enabling independently operating robots to perform operational tasks.

### Planning Assessment

The main issues arising are whether the mast and equipment cabinets, due to their scale and siting, would be a visually obtrusive feature which would be detrimental to the character and appearance of the area and whether any perceived harm would outweigh the significant social and economic benefits associated with the increased service provision attributed to the proposal and other valid material considerations as outlined in the NPPF, which fully supports the roll out of 5G and the next generation connectivity to accelerate business opportunities and growth to ensure the economy is resilient and competitive, the Code of Practice, and also the relevant objectives and policies within the Mid Sussex District Plan, West Sussex Digital Infrastructure Strategy and Mid Sussex Economic Development Strategy.

The site complies with the NPPF, West Sussex Digital Infrastructure Strategy and UK Wireless Infrastructure Strategy as it will improve capacity and provide new 5G services to this area of Burgess Hill. Access to a high quality, reliable superfast mobile network is not just 'a nice to have' but an essential part of everyday life. In the latest UK Infrastructure 10 year Strategy (June 2025), the Government identifies digital connectivity being part of the long term future of the UK. The Strategy states:

*"Digital infrastructure for growth and innovation*

*Para - 3.37 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*

*Para - 3.38 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.<sup>120</sup> 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"*

The principle of development has been established by the Government when the new permitted development rights came in to force in April 2022, which enabled sites such as this one to be built under the operators permitted development rights, with

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prior approval for siting and appearance being the only matters that the local planning authority can take in to consideration (as the width of the replacement column and headframe is more than two thirds wider than the existing).

Planning Practice Guidance explains how a prior approval application differs from a planning application at paragraph 28. It states that:

*'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 (emphasis added). Where no specific procedure is provided in the General Permitted Development Order, local planning authorities have discretion on 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' (emphasis added).*

The Planning Portal also provides Application Type Guidance. This guidance states that:

*'Certain forms of telecommunication development, for example, mobile telephone masts, are known as 'permitted development' and subject to prior approval from the local planning authority. The prior approval procedure means that the principle of development is not an issue. The LPA can only consider the siting and appearance of the proposal'.*

## Siting

The area has undergone significant development in recent years with a number of housing developments being approved and subsequently built (see LPA ref's: DM/22/3049 / DM/20/0886 / DM/19/5217), not only has this restricted the available land for the applicant to site their mast but meant the demand for coverage has increased. The proposal is seen as the only location in which the applicant can provide the required network coverage to the area without impacting on residential amenity.

The siting of the proposed radio base station has been carefully considered. It is accepted the radio base station will be located near to residential properties, however the site search area is constrained by residential properties that would face the site in either direction. Therefore it is considered a site that is located adjacent to residential properties, whereby their primary windows face away from the site. This reduces the visual impact of the site on the residential amenity, especially when compared to the previously refused sites.

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There are a number of existing vertical elements of street furniture in the immediate vicinity, including lighting columns and road signage. Consequently, the visual impact of the proposed radio base station will be minimised within the streetscene as the proposed monopole will assimilate well with the existing vertical structures already in situ in the immediate locale. This is in full accordance with the aspirations of the NPPF, Code of Practice and the design aspirations of Policies DP23 and DP26 of the Mid Sussex Local Plan.

The proposed telecommunications mast and new equipment cabinets fully complies with the objectives of the NPPF. Government guidance states that in order to limit visual intrusion the number of radio and telecommunication masts and the sites should be kept to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used unless the need of a new site has been justified.

This radio base station will fill the gap in coverage that this area of Burgess Hill is experiencing in line with the NPPF. The operators' license obligations requires them to meet customers "*reasonable demand*". Reasonable demand would be to provide indoor coverage as customers expect to be able to use their handsets indoors. The operators also have a competitive market driven "*requirement*" to provide a high-quality service. The monopole is essentially required to enhance the existing 4G coverage and capacity but will also provide new 5G services to the area. The new site will reduce the overall number of radio base stations required which is fully in line with national guidance and The Code of Practice.

Technical requirements have dictated the siting of the proposed equipment. The operator has spent a considerable amount of time identifying a potential site and the proposed location is considered to present the best balance between operational/technical requirements and environmental impact.

VMO2 have previously tried to find a site for a base station in this area. Previously the installation of a 15m Elara pole was refused on Land at the Junction Of Folders Lane And Kings Way in 2016 due to the siting and appearance of the development (Ref: DM/16/1533).

This was also the case in 2017 as the request to install a 15m monopole on a grass verge on Folders Lane, opposite Thornhurst (Ref: DM/17/1309) was refused as the structure would be significantly taller than the adjacent street furniture and would be prominent, obtrusive and visually harmful to the street scene.

Another site in 2018 was also refused for a 15m site on adopted highways pavement at bridge approach, Kings Way (Ref: DM/18/3924). This is north of the current site and

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was refused due to being taller than the adjacent street infrastructure and would be obtrusive and visually harmful to the street scene.

There was another notable refusal in 2001 for a 12.5m monopole (01/01569/TEL42) from One 2 One Communications who are no longer operating (became T-Mobile, merged with Orange and now EE).

The need for a base station in this area has not changed within the past 25 years, if anything, due to the modern demands and increased usage of the network, the need is even greater. The background of this area in terms of siting the base station shows that the area, although sensitive, has potential for base station. The applicant is very limited in its siting options in this area due to the purely residential nature of the area and the uptake of land being compromised to accommodate new residential developments. The proposed site location is seen as the least harmful in terms of siting.

Submitted with this proposal are a number of recent appeal decisions and accompanying plans whereby sites have been located in similar residential settings or directly in front of residential frontages, evidencing the fact inspectors consider monopole's in residential settings to be acceptable. They are becoming common elements of street furniture. In August 2022, a similar designed monopole and at the taller height of 20m was approved at appeal in South Staffordshire, at the grass verge of Warstones Road / Stourbridge Road Junction. The inspector states at paragraph 6 :

*'Due to its position and height, the proposed mast would be visible in views when travelling along Stourbridge Road and Warstones Road and the upper part of it would protrude above trees and streetlighting. Whilst the proposal would result in visual change, it would be viewed in the context of a busy thoroughfare in a suburban area and other street furniture. Telecommunication installations, such as the one proposed, are common features in such environments given the requirement for high quality communications and that advanced, high quality, reliable communication infrastructure is considered essential for economic growth and social well-being. In the context of the surrounding area, I find that the proposed development would integrate into the area and would be compatible with its surroundings'.*

As the inspector notes, telecommunications installations are becoming more common in busy suburban areas, such as the appeal site location as high quality, reliable communication infrastructure is considered essential.

Due to the high frequency 4G and 5G signals do not carry far, therefore masts need to be in close proximity to the demand. The search area is as such to infill this demand and meet the coverage and capacity requirements for this operator, on behalf of the applicant. Anything outside of the search area, simply would not work. It would

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leave a hole in coverage and the capacity of the surrounding sites would continue to struggle.

See PINS decision Hollin Lane which was approved in March 2025, an appeal was allowed in a similarly densely developed residential area in Rochdale, Hollin Lane for the installation of a 20m monopole supporting 6 no. antennas (appeal ref: APP/P4225/W/24/3353275). The site was located at a similar distance to residential properties compared to this site. There are numerous comparable points in the location and findings from the inspectors decision. However, the inspector found the monopole would be taller than the surrounding street furniture and dwellings, paragraph 9 states:

*'...Whether or not such installations are designed to be installed and are common in urban areas, the proposed 20m high mast would be significantly taller than the adjacent dwellings and lighting columns that exist to 7.5m and 12m respectively'*

Whilst the inspector noted there would be moderate harm that would arise from the proposal, they weighed this up against the alternatives in the site selection process. This balancing exercise also referenced that alternatives outside of the search area, would not achieve the required coverage or capacity, see paragraph 16:

*'It is clear from the evidence presented that the number of sites considered within the constrained search area is extensive. I am satisfied that an installation located outside of the search area would not allow the operator to provide their desired level of coverage or capacity. Other appeals within the search area and vicinity of the appeal site have previously failed, including one for which I was also the Inspector. This helps to demonstrate the extent to which other sites have been considered and pursued in the search area. With no evidence to indicate otherwise, the appellant's site selection process appears to be robust. Drawing the above points together, I am satisfied that there are no more suitable available sites within the search area'.*

In contrast, this location is located at a similar distance to the residential properties. The residential dwelling will have views at an acute angle, compared to the site referenced above where views from the residential flats were face on from their frontages. Similarly to the appeal decision, there are other vertical elements of street furniture in the area which will help the mast blend in with its surrounds.

In an appeal on Woodcock Hill in Harrow for a 20m monopole column in relation to the operator needing to find a replacement site in order to replicate and improve existing coverage following the loss of an existing site nearby for redevelopment reasons, the inspector allowed the appeal even though they found the monopole

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would be visually prominent, there were no alternative options that could provide the required coverage and capacity (PINs reference: APP/J4423/W/20/3252355). They also considered alternative options within the search area would have a greater harm on visual amenity, a similar scenario to this application, therefore it was deemed acceptable:

*Para 14 "Therefore, I am satisfied that there are no other mast sharing opportunities, suitable buildings or other structures within the required search area that would be capable of accommodating the proposed installation. Although the proposal would be visibly prominent, there would be some limited mitigation offered by having the lower parts of the mast set against a backdrop of trees and it would be located a sufficient distance from nearby dwellings, which is not the case for all alternative locations. Third parties have not put forward any further alternative sites which have not been considered by the appellant"*

*Para 15. "I conclude that the siting and appearance of the proposed installation would cause harm to the character and appearance of the surrounding area. Whilst alternative sites may exist, the appeal proposal is preferable for the reasons outlined above. Therefore, any identified harm is outweighed by the need for the installation to be sited as proposed, taking into account the suitable alternatives"*

Whilst the operator is not looking to replace existing coverage in this instance, instead they are trying to enhance and provide new 4G and 5G coverage in order to fill a gap, there are still some key points raised by the inspector. The appeal site was situated in a similarly dense residential area, whereby the monopole would be situated outside residential frontages, unlike this proposal. The inspector found whilst there would be harm to character and appearance of the area, there were no other suitable alternatives that would provide the required coverage and capacity to the area. The search area was constrained with underground services, narrow footways, unsuitable rooftops and lack of space anywhere elsewhere else within the search area. A similar case here, there is nowhere else for the operator to locate their mast, hence the reason they have reduced the height of the monopole to minimise its visual appearance.

Finally, see attached an appeal decision from August 2025 for the installation of a 20m monopole in Croydon. The proposal was in a similar setting as to this current proposal and the main issues were regarding, the character and appearance of the area and if the living conditions of existing occupiers having particular regard to outlook. The inspector again, found the monopole would be taller than the surrounding buildings, trees and street furniture, with trees that would screen the monopole along a busy road but there would be short to medium range views for

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users of the main road, a similar situation here. However, in this instance, the inspector found there would be no harm to the setting of the area:

Para 10 "Whilst the monopole would be taller and wider than these lighting columns, it would be finished in a similar colour, the antennas atop would have a relatively slimline design and overall, **it would not appear alien or unexpected, even when the siting of the development on an open grass verge is taken into consideration.** The verge area would continue to provide visual relief to its built-up surroundings, notwithstanding the introduction of the proposed development, and would remain a largely open feature that positively contributes to the street scene. Moreover, **even though the monopole would be large scale, given the scale of the surrounding highway infrastructure it would not be disproportionate to the context of the surrounding area and would be perceived as part of the existing ensemble of urban infrastructure in the vicinity**".

The inspector considered the living conditions would not be affected due to the relatively slim line appearance of the monopole:

Para 14 "...The monopole would be separated from this property by the pavement and wide highway verge within which it would be located. Whilst the monopole would be a tall structure in relatively close proximity to this dwelling and the antennas atop would add some bulk, it would appear as a relatively slimline feature overall. The monopole would nevertheless be visible from this property; however, it would be offset from the property's windows and the most sensitive part of its garden (which is likely to be the area adjacent to the rear elevation), which would limit the prominence of the installation in views from that dwelling and its garden..."

This application is at a similar distance as the residential properties, with a separation provided by a footpath and grassed verge. The design of the monopole is exactly the same as the appeal decision, in a similar residential setting, located on a main, busy road and the siting of it being offset on the grassed verge to be away from the windows. The proposal, albeit will be visible in this residential area needs to be weighed against the alternative options (see section 5 above and map 2). A site needs to be within the search area, otherwise it will not work, it is considered there would be harm to the residential area but when weighing the harm against the alternative options, it is considered the need and lack of alternative locations in this area.

The site is situated on Kings Way, away from the direct line of sight of any frontages of residential properties. There will be some views for the rears of 1 and 3 Burdocks Drive, 3 – 11 Cold Waltham Lane, along with 1 The Holt. However, referenced above,

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inspectors at appeal accept this harm. There is a clear separation distance from all of these properties with the footpath and their gardens. The windows are slightly offset from the majority of views due to the angle in which they'd view the site. Their current outlook when viewing from their windows is a main road with other vertical elements of street furniture. In this respect given the separation distance, the busy street scene and the relatively slim and simple design of the installation, then it is considered that the presence of the proposed streetworks style mast on this wide grassed verge will not undermine the residential amenity of those living in these properties.

Such is the need for coverage and capacity, it should be appreciated that being close to some residential accommodation cannot be avoided in which as stated in NPPF paragraph 121, LPAs should not impose a ban on new telecoms site nor insist on minimum distances to certain development, like housing. Therefore, taking into account the setting of more sensitive locations, it is considered that the proposal has been sited so far as practicable to help minimise its impact when taking into account the proximity to and visibility of the installation from nearby habitable room windows and will not undermine their residential amenity that they currently enjoy. In this respect, it is considered that the proposal is set far enough removed from residential properties so that the scheme will not impact significantly upon their residential amenity whilst still being close enough so as to provide the necessary coverage and capacity.

In line with the requirements of NPPF there are no nearby existing telecommunications installations that the operators are able to share. Similarly, there are no buildings which are suitable and available that the operator could utilise to operate their equipment. Therefore, a new ground based installation is required. The discounted options are set out above and their reasons for being discounted are fully explained with a search area map to show the limited area the operator is working within to fill this hole in coverage and provide 5G coverage to the Burgess Hill Area.

To justify the progressed location, material weight should be given to the constraints of the defined search area and the discounted options listed and in accordance with NPPF and sequential approach to site selection. Firstly, when taking into account the existing sites in the wider VMO2 network, it was found that there were no existing installations that could be upgraded to meet the coverage requirements in this particular area. Similarly, it should be noted that surrounding sites in the network have been optimised to their full potential, hence the gap in coverage and capacity and the coverage plots submitted. The next appropriate step as part of sequential approach to site selection was to utilise any existing base stations belonging to another operator, however, there is no existing telecommunications provision in the target area that is suitable in addressing the coverage needs of VMO2. Leading on there are no suitable tall buildings in the target area that were able to be progressed. Therefore, when taking into account the whereabouts of target audience, the

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geographical extent of the search area in terms of its dense built features contained therein, then it has been these factors that have led to the application site being advanced. In this regard, it is evident that the applicant has exhausted a number of alternative sites before progressing the chosen sites and specific proposal, in which it is considered that on balance there is no other realistic opportunity elsewhere that would be less detrimental than that of the site advanced.

4G signals by their very nature (as they carry high data rates) do not penetrate over long distances, (5G even less so), just a few hundred metres, depending on the topography of the land, building clutter and vegetation including trees in the area which can reduce their effectiveness. Therefore, 4G and 5G radio base stations need to be close to their customer demand which is normally in residential areas. However, in this instance, the target coverage area is Burgess Hill. As this site needs to fill a gap in the operator's network, whose network configuration is well established in the area, the operator's search area is naturally smaller, than would otherwise be the case if the operator wasn't already providing service provision from this location. This severely limits the options for siting a new installation in the area.

The discount map embedded in this statement shows the sites that were investigated for their potential to accommodate a telecommunications base station installation, however, for the reasons detailed in the table above the locations that have been identified were subsequently discounted in favour of the proposed site. With regards the matter of alternative sites, the attached High Court judgement and quotes below from the Justice Lang case in Birmingham has relevance when reviewing possible options and the reason given for discounting them. "41. *There is no general principle of law that the existence of alternative schemes is inevitably a mandatory material consideration in any case, even where the proposed development would cause adverse effects, but these are held to be outweighed by its beneficial effects: see R(CPRE) v Secretary of State for Transport [2023] EWHC 2917 (Admin) at [65].* 42. *Even where alternatives might be relevant, "vague or inchoate schemes, or which have no real possibility of coming about, are either irrelevant or, where relevant should be given little or no weight": see R (Save Stonehenge) v Secretary of State for Transport [2022] PGSR 74, at [270]."*

It is recognised that the origin of the chosen site subject to a Prior Approval application derives from the applicant's site search investigations within the defined search area, however, it should be at the forefront of the LPA's mind when making an assessment that the scheme is permitted development, hence the main focus should be on the proposal's siting and appearance itself (see planning portal guidance referenced above). As a result, the Justice Lang caselaw is a material consideration in the assessment of alternative sites, these caselaw findings should be taken on board when assessing whether an option is truly realistic to be brought forward. Therefore, when taking into account the technical constraints that implicate

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on a proposal's siting, height and design, together with the need to locate a new base station within the defined search area, should the LPA believe there to be a different location that has its planning merits and is a superior option to the proposal advanced, they should discuss the site-specifics with the agent during the life of this application.

In line with NPPF, the proposed installation is an item of essential infrastructure and therefore will not cause any loss of privacy. The column and antennas do not emit any noise, odour, vibration, artificial light or disturbance from air. The only noise emitted is from a cooling fan within the equipment cabinets, which only operate during hot weather conditions. However, within a few metres the noise is inaudible, particularly when taking into account the ambient noise levels of the area which include passing traffic. The proposed installation will not cause any traffic generation as it is not a visitor destination. Maintenance of the equipment cabinets is usually once a year, where the engineer can walk to site with handheld tools.

### **Appearance**

The design of the monopole has been carefully considered. To this end, it is a simple, functional Orion street pole. The column width is essential in order to safely support the antennas at the top of the column. The column is proposed to be grey to match the street furniture. However, the street pole can be painted any colour should the Local Planning Authority consider that an alternative colour would be more appropriate.

The height of the monopole is proposed to be 17.5m above ground level. The site was originally proposed to be 20m tall, but it is acknowledged that the nature of the location needed that this would cause some harm and ultimately the decision was made to install a smaller monopole here. A height lower than 17.5m would mean that the antennas would not be able to clear the surrounding urban clutter as such would not be able to operate effectively. It would lead to a poor user experience for a large part of the target coverage area. As such, this would fail the operators design brief and an additional installation would have to be found leading to the proliferation of masts contrary to national planning guidance contained in the NPPF. This would have a greater impact on the wider surrounding area, as there would be multiple masts required in order to reach the target coverage area of Burgess Hill. The proposed monopole benefits from being in line with other vertical elements of street furniture so the pole is seen as another vertical piece of street furniture.

It is essential that the 5G antennas are unshrouded. As the radio frequencies get higher, required for data carrying, the antennas are less able to propagate through immediate blockages including Glass Reinforced Plastic, which is what the shroud is made from. This affects the 5G antennas more so than any other technology. The

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result being they cannot operate effectively close to Glass Reinforced Plastic or any other blocking material. Therefore, there is a technical reason why the 5G antennas need to be unshrouded. The latest 4G technology are also affected more so than older technologies by propagation and are therefore less efficient if they are shrouded. As such, the other antennas also need to be unshrouded to ensure that the latest technologies are provided to the surrounding area maximising their propagation.

The installation of this 17.5 metre high column designed to be as similar as possible to the other linear structures found in the immediate area will be no more at odds with the street scene and character of the area than the other vertical structures within the immediate vicinity.

It is accepted that the height of the proposed installation is taller than other pieces of surrounding linear items of street furniture. This in itself is not a valid reason to conclude that it is not appropriate at a specific location. This was the main reason for refusal in the previous applications for a structure in this area.

Telecommunications apparatus by their very nature must be taller than surrounding built and natural form to ensure its efficient operation. The Code of Practice explains this requirement fully in paragraph 39, *'Placing a mast within or adjacent to an existing group of trees, vegetation and other natural features can reduce visual impact... antennas will need to be sufficiently elevated to clear the tree-line...'* It is an essential piece of infrastructure, like pylons and telegraph poles. The proposal should not be considered negatively due to it being taller per se than the surrounding street furniture. To suggest that it is inappropriate development because it is taller than adjacent lighting columns or road signage is no more relevant than suggesting that street lighting columns are inappropriate because they are taller than road signage or traffic lights. They are all essential pieces of infrastructure within a street scene that carry out differing functions and therefore cannot be considered on the same merits. Should a street lighting column be capable of the provision of high quality 2G/4G and 5G telecommunication services for operator then this would be a reasonable consideration, but this is clearly not the case. As such, the proposal should not be considered negatively due to it being taller per se than other vertical structures. Reasonable consideration of the proposal in the context of nearby trees and street furniture can only conclude that the presence of other vertical structures in the immediate area only seeks to provide a setting wherein a base station may appear more congruous from which to provide an important service to a wider area.

NPPF states at paragraph 119 the number of radio and electronic communications masts, and the sites for such installations, 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. In order to provide the latest 4G

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technology and 5G service in this locality, and to ensure that the coverage in the area is reliable and does not buffer or drop out, a new site is required. The operator has already explained above, it is unable to shroud the antennas, but the design is as slim as possible and will represent a simple, functional, vertical structure in the street scene similar to the existing lighting columns on the street.

If the column and shroud were to be any slimmer, then the multi technologies would not be able to fit in the same installation and an additional radio base station would be required which would be contrary to national planning guidance. It would also not be structurally capable of supporting all the technologies including the latest 4G coverage as well as 5G service provision. If the column were to be the same width throughout, then it would have to be as wide as the antennas at the top of the column. This would appear more visually prominent in the street scene than the current proposals.

This is the slimmest design approved for use by the operator, which will enable all technologies to be supported from this site. The antennas have been designed to be as tightly packed together as possible to minimise their visual appearance. If the column and antenna width were to be any slimmer, the technology would not fit in the one column and another radio base station would be required, which would lead to the proliferation of masts contrary to national guidance contained in NPPF and the Code of Practice. Similarly, if the column were to be a uniform width throughout then the width of the supporting column would have to increase which would appear more visually prominent in the street scene, than the proposed design.

The proposed streetworks design is more visually sensitive and much easier to assimilate into a street scene than lattice towers with bulky headframes. These traditional greenfield site designs are preferred by operators as they are structurally capable of hosting more equipment and give greater scope for antenna orientation and are thus more efficient structures. However, such designs would appear alien in this public footway location. Therefore, the operator has compromised on obtaining maximum coverage in order to better assimilate into the street scene.

The proposals fully accord with the Code of Practice. The design of the column is a simple, functional, vertical structure which will not appear incongruous within the street scene.

The only element of the proposal which requires prior approval is the street pole. The cabinets are designed to appear like other statutory undertakers equipment cabinets, including in the immediate street scene. The equipment cabinets measure below 2.5m<sup>2</sup> so can be installed under the operators permitted development rights. However, they have been included on the plans and in the description in order to

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remain fully transparent. Their colour is proposed to be green to match other statutory operators' equipment cabinets commonly found in urban areas.

The design of the radio base station is one of the most sensitive designs available to the operators, designed to resemble typical existing urban linear street furniture. This is in line with the requirements of NPPF which supports equipment which is sympathetically designed and camouflaged where appropriate [paragraph 119], The Code of Practice as well as Policy DP23 in the Mid Sussex District Plan.

The proposed new site accords with NPPF because the equipment will resemble other linear structures within the area and will expand the network, ensure high quality communications infrastructure is maintained whilst minimising the number of radio base stations in the area. Placing masts near similar structures such as lighting columns, utilising simple and unfussy designs is acknowledged in the Code of Practice on Mobile Network Development in England to be less likely to dominate and be in discord with the street scene and as a result less likely to have a detrimental impact on the visual amenity of the surrounding area.

It has been demonstrated there are no reasonable alternatives that exist in less sensitive location, taking into account the purely residential nature of the search area and alternative that would be directly in front of primary windows. There will be some views of the site from short range views, however the slimline design of the monopole and overall bulk at the top of the monopole being out of the natural eye-line results in the siting and appearance being the least harmful location when considering the alternative sites.

### **Lack of Coverage – Material Consideration**

Attached as part of this application is a letter dated 29 November 2024. The letter is from Sir Chris Bryant MP to Council Leaders and Council Chief Executives across the UK in support of digital infrastructure deployment.

The letter confirms the importance of fast and reliable connectivity and the Government's commitment to supporting the delivery of next-generation connectivity across the UK by driving towards nationwide 5G coverage by 2030. The letter requests help from Councils across the UK to achieve these goals by prioritising digital infrastructure and focussing on a number of areas that remain a challenge to telecoms investment.

There is a specific ask in the MP's letter that Councils **'support the deployment of communications infrastructure wherever possible'** (emphasis added).

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The Government published the UK Government Resilience Action Plan in July 2025. At paragraph 57 - Improving the resilience of Critical National Infrastructure, it states:

*"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" (emphasis added)*

And para 109d –

*"further invest in resilient telecommunications capabilities for crisis management response. The UK government has undertaken a strategic overhaul of its approach to resilient telecommunications, which are paramount to respond to a National Power Outage and other national security risks. This has included a recent investment in ensuring our resilient voice capability, situated across the UK to enable a means of information flow across the local and national level, is fit for purpose and is now exploring opportunities to augment our capabilities with the addition of resilient data provision".*

These Government publications weigh heavily in favour of the application in regard to the social and economic benefits of telecommunications installations, more specifically 5G can bring.

In accordance with the NPPF, the proposed installation is significant to enable continuous coverage of the telecommunication network, ensuring that this area of Burgess Hill continues to get the mobile coverage it needs for VMO2 customers as well as new 5G coverage. It will also maintain and improve coverage for the Mobile Virtual Network Operator's (MVNOs) which use the VMO2 network which includes Giff Gaff, Tesco Mobile, Sky Mobile on the VMO2 network. So the proposal will not only provide a service for two operators but those who buy network space off them, which is at least 3 with VMO2. This will provide a choice for those customers who consider the level of coverage in their area when selecting which operator they agree future contracts with.

The current proposals will facilitate the development of an advanced broadband telecommunications infrastructure in line with National Government guidance contained within the NPPF which supports infrastructure especially where growth takes place. By providing the latest 4G technology and new 5G service provision the proposals will support the aspirations of Central Government for everyone to have

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access to the superfast highway network wherever they are and that all populated areas are connected to the 5G network by 2030.

The proposals will ensure that any customer in this cell area will be able to access resilient, seamless connectivity at a speed they need anywhere at any time. Without the more basic technology solutions such as 5G, the Wireless Infrastructure Strategy Framework acknowledges that smart-region solutions and value-added outcomes will struggle to be brought to fruition.

Mobiles can only work with a network of base stations in place where people want to use their mobile phones or other wireless devices. Without base stations, the mobile phones and other devices we rely on simply won't work.

Without this proposed installation the operator's customers would experience increasing numbers of dropped calls and buffering unable to access the internet on their handheld devices. They would also not be able to access the 5G network, a demand which is increasing rapidly as customers update their handheld devices to ones that are 5G compatible. If the 5G network is not available, then the customers would not be able to utilise these handheld devices for the purposes in which they were purchased. This would be contrary to the aspirations of Central Government which aspires to everyone having access to the superfast highway network wherever they are and being a world leader in 5G.

The Government fully supports high quality communications infrastructure, even more so with the advent of 5G. The NPPF continues to strongly support telecommunications connectivity and states at paragraph 119 that local planning authorities should support the expansion of electronic communications networks. It acknowledges that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being.

The demand for mobile data in the UK is increasing rapidly, and as households and businesses become increasingly reliant on mobile connectivity, the infrastructure must be in place to ensure supply does not become a constraint on future demand. This is echoed by policy DP23 of the Mid Sussex District Plan and the West Sussex Digital Infrastructure Strategy.

The Code of Practice emphasises the need for Local Planning Authorities to take account of these constraints, on network deployment and siting and design, when considering proposals. In relation to the introduction of 5G network deployment the Code acknowledges the requirement of additional equipment to provide necessary coverage and capacity. With the increasing consumer demand and the Government's ambitious aspirations it is becoming more important to improve connectivity and capacity. This is due to the ever increasing demand for data hungry

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applications to be available to a range of connected devices, such as smartphones and tablet computers. However, the Code notes that upgrading and improving mobile networks will not be possible without the necessary infrastructure on which they rely. Therefore, there is a significant need to locate the equipment in this area.

The operators not only have a license requirement to provide a certain level of 2G/4G coverage to the population, but they are also obliged to meet the growing consumer demand for 5G coverage, especially as more people are purchasing 5G enabled devices, in line with their license obligations and the operators competitive market driven "requirement" to provide a high quality service. Customers expect to be able to access their portable handheld devices wherever they are, whether that be indoors or outside.

It is therefore imperative that the operator continues to invest in ensuring that the latest technologies are available on its network, so that customers are able to continue to use their handheld devices wherever they are, for whatever reason, for the purposes in which they were purchased.

### **Economic and Social Benefits**

The NPPF strongly supports sustainable development, as does the Harrogate District Local Plan. Mobile communication plays a significant role in sustainable development, being able to access the internet via a mobile device allows people to access a wide range of central and local government services buy groceries, manage finances, apply for jobs/university, and carry out school projects, send emails, download applications, send and receive instant messages, participate in social media, streaming and downloading data to name just a few of the benefits of being able to use an internet enabled handheld device. It also allows people to work from home or on the move without needing to return to the office. Residents and businesses will enjoy better accessibility, assisting home-base working by improving the electronic means of communication and the roll-out of high-speed broadband helping to promote live-work development. This reduces travel time, carbon emissions and increases the speed in which information is processed/shared. The proposals therefore fully comply with NPPF to minimise the effects of climate change reducing the need to travel and therefore the carbon footprint. It will support a carbon-neutral Burgess Hill and be economically, environmentally and socially sustainable in line with the Mid Sussex District Plan.

In such instances, as described above, the NPPF supports development that improves the economic, social and environmental conditions in the area. Enhancing the 2G, and 4G coverage and capacity in this area and providing new 5G services will fully meet this national policy objective. Continuing to transform the digital connectivity

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of the city-region to drive economic growth and innovation, working to meet national targets of full roll-out of 5G technology for all populated areas by 2030.

Providing the latest digital infrastructure to enable improvements in digital technology empowers and enables residents to have the highest quality of life, supports the creation of high quality jobs and achieves the maximum productivity levels. It also helps the economy to be resilient and competitive. This is in accordance with West Sussex Digital Infrastructure Strategy and UK Wireless Infrastructure Strategy. It will help Burgess Hill become an area where its businesses, public service providers and citizens are using digital technology by default and to the fullest to grow their businesses and improve productivity to access skills, training and employment opportunities to address global challenges that have a local impact such as ill health, social isolation, and pollution; to improve living standards and well-being, helping people to lead prosperous and rewarding lives; and to improve the quality and value for money of public services.

A recent report by MobileUK looks into the challenges faced by the industry in bringing about a step change in the sector's capacity for raising capital for significant infrastructure upgrades. The report found, for every pound invested by the operator it returns £5 GDP to the local economy (Mobile UK study). i.e. returning 5 x the value to the local area. The multiplier effect. The proposal should be well balanced between the visual harm compared to the significant social and economic benefits mobile connectivity brings. The operator has a massive infrastructure investment to your area, which should not be understated in its impact on the local economy, Cornerstone is a key enabler to the local economy.

For every £1 invested in digitally upskilling someone equates to £10 back to the local economy. But if they then cannot access the latest technology, it could well push them to leave the area taking their new found skills with them. Without this installation, those living and working in the area will not reap the benefits of 5G.

Every time a planning officer refuses an application for telecoms it means the application cannot invest their money in their infrastructure to deliver better connectivity to your businesses and the multiplier effects are simply not received. i.e. no knock on benefits<sup>2</sup>.

### **Practical Applications of 5G Connectivity as Example of Material Socio-Economic Benefit: -**

#### Education:

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<sup>2</sup> <https://www.mobileuk.org/rebalancing-act>

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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.

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 allow learning on the job, thanks to technologies such as Augmented Reality (AR) goggles, which can give engineers real-time instructions on how to fix a machine on a production line, for example.

#### Health:

Patients across the country are now becoming accustomed to relying on remote healthcare services such as NHS 111, virtual GP appointments, and ordering online deliveries of essential medical supplies.

5G will prove critical in providing the infrastructure required to deliver remote health services over the next decade. By design, 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.

Paragraph 39 of the NPPF states that:

*'Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including...permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible'.*

Providing improved 4G coverage and capacity and new 5G service provision in this area will fully meet paragraph 39 of the NPPF, West Sussex Digital Infrastructure Strategy and Mid Sussex Economic Development Strategy. These strategies and the Wireless Infrastructure Strategy Framework also support strengthening digital and data infrastructure (including 5G) and using data to help address challenges.

The Government is determined to ensure the UK receives the coverage and connectivity it needs. To this end, the Government wants to be a world leader in 5G,

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the next generation of wireless connectivity, and for communities to benefit from the investments in the new technology. The proposed installation will fully support these national and regional aspirations.

This will allow everyone in the country to benefit from the economic advantages of widespread mobile coverage. As well as improved mobile signal, 5G networks are also crucial to drive productivity and growth across the sectors that local areas are focusing on through their emerging Local Industrial Strategies. Enabling and planning for 5G implementation is central to achieving the Government's objective to deliver property at the local level and enable all places to share in the proceeds of growth.

The case for 5G is compelling as it will bring faster, more responsive and reliable connections than ever before. More than any previous generation of mobile networks, 5G has the potential to improve the way people live, work and travel, and to deliver significant benefits to the economy and industry through the ability to connect more devices to the Internet at the same time, creating the so-called "Internet of Things". This will enable communities to manage traffic flow and control energy usage, monitor patient health remotely, and increase productivity for business and farmers, all through the real-time management of data.

## Summary

The proposed radio base station is proposed to be located on a grass verge on the West side of Kings Way, just north of the junction with Burdocks Drive. The area is predominantly residential with the site being situated away from the frontages of the surrounding houses.

As part of VMO2's continued network improvement program, there is a specific requirement for a new installation at this location to provide improved 4G coverage and capacity, and new 5G coverage, ensuring that this area of Burgess Hill has access to the latest technologies. The site is seen as the best option considering the planning history of this area regarding telecoms masts. Burgess Hill has been an area of interest in terms of siting a mast, but these applications have all been refused due to the monopole being obtrusive and rising above the rest of the street furniture. The new radio base station is proposed to be coloured grey which will allow it to blend in with the typically grey sky, further minimising visual impact on the surrounding area. It is also sited adjacent to semi mature trees in order to further mask the base station.

As this is a prior approval application, the Government confirms that this is permitted development, akin to outline planning permission, with just the finer details of siting and appearance to be considered by the local planning authority. The vertical structures help the proposed installation assimilate with the street scene and not appear alien in the immediate area.

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The proposed height at 17.5m is essential in order for the antennas to clear the surrounding urban clutter, trees and ensure the antennas are able to reach the target coverage area, to provide new high quality 4G coverage and capacity and new 5G service provision to Burgess Hill. This will fully meet the national Governments aim of 'ensuring that everyone is connected to the information superhighway' and the national policies set out in the NPPF. If the height of the column were to be reduced then the antennas would not be able to operate effectively, leading to a degraded service for the operator's customers especially for the higher frequency technologies including the latest 4G technology and new 5G service provision.

The social and economic benefits of providing reliable and high quality mobile broadband connections including 5G support growth in productivity, efficiency and labour force participation across the whole economy. This is fully supported by the NPPF. These benefits are strong material considerations which outweigh any perceived loss of visual amenity to the surrounding area.

### Confirmation that submitted drawings have been checked for accuracy

|               |                                                                                            |            |                             |
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| Signed:       | <u></u> | Date:      | <u>30/01/2026</u>           |
| Position:     | <u>Graduate Town Planner</u>                                                               |            |                             |

(on behalf of Cornerstone)

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