

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	LITTLE WALSTEAD FARM	Site Address:	LITTLE WALSTEAD FARM, 6 NOAHS ARK LANE, LINDFIELD, WALTSEAD, MID SUSSEX, WEST SUSSEX, RH16 2LT
National Grid Reference:	535316, 124965		
Site Ref Number:	11739204	Site Type: ¹	Macro

Site Background information:

As part of VMO2's continued network improvement program, there is a specific requirement for a radio base station upgrade at the above location to provide enhanced connectivity to the area. An existing telecommunications site has been identified; however, the current equipment cannot accommodate the operator's latest requirements. As such, replacement equipment is needed in order to implement this upgrade to VMO2's service.

This application therefore seeks consent for the siting and appearance of:

The removal of the existing headframe, 2no. antennas, ancillary equipment and 3no. cabinets; the installation of a new headframe supporting 6no. antennas, ancillary equipment and 2no. 0.3m dishes, the installation of 2no. cabinets and development works thereto.

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?	Yes	No
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¹ Macro or Micro

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Registered Address:

Cornerstone Telecommunications, Infrastructure Limited,
Hive 2, 1530 Arlington Business Park, Theale, Berkshire, RG7 4SA.

Registered in England & Wales No. 08087551.

VAT No. GB142 8555 06

Sinclair Dalby Limited, 11 Windell Street, Bath, Somerset, BA2 5BG

Registered Office, Sinclair Dalby Limited, 11 Windell Street, Bath, Somerset, BA2 5BG. Registered in England 7610197.



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If no explain why:		
N/A – upgrade of existing site		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why:		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	No
Date of pre-application contact:	N/A
Name of contact:	N/A
Summary of outcome/Main issues raised:	
A pre-application submission pack containing a description of the proposal, drawings and a consultation plan was sent to the Local Planning Authority for comment on 29 th January 2026.	
No response has been received to date.	

Annual area wide information to planning authority

Has annual area wide information been provided?	No
If no explain why:	Please see commentary below

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Summary issues raised:

Cornerstone's commercial relationship with VMO2 has changed, effectively increasing their independence to work with other companies in the deployment of mobile infrastructure. It means Cornerstone no longer has visibility of VMO2's full update plan. However, Cornerstone is fully committed to working closely with Local Planning Authorities and following best practice guidance.

Cornerstone aims to engage and work with the planning department at the earliest opportunity from when it is instructed to deliver new infrastructure within your Local Authority area and often conduct strategic pre-rollout engagement meetings to discuss their wider rollout. If your Local Authority would like a meeting to discuss wider Cornerstone rollout plans, then please advise. We recognise the importance of developing long term partnerships and will always work with you to deliver improved mobile connectivity.

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline of consultation carried out:			
A description of the proposal and drawings was sent to the following for comments by email on 29th January 2026:			
- Lindfield Rural & High Weald Ward Councillors: Paul Brown and Lorraine Carvalho - Lindfield & High Weald Councillor Garry Wall - Lindfield Rural Parish Council - Alison Bennett MP			
Summary of outcome/main issues raised (include copies of relevant correspondence):			
No responses have been received to date.			

School/College

Location of site in relation to school/college (include name of school/college):
None in proximity.

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

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	27 th January & 4 th & 13 th February 2026	

3. Proposed Development

The proposed site:
This existing site requires an upgrade to accommodate increased network demands, provide modern equipment and allow for continued consistent coverage to be provided to this area by VMO2. This proposal forms part of an ongoing network improvement programme aimed at future-proofing the network and enhancing capacity in the area. A sequential approach has been taken to ensure that existing masts and equipment are used where possible. Following technical assessment however, the existing installation cannot accommodate the operators' latest technical requirements. As such new equipment is required for this upgrade at this location.

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The site upgrade is needed to provide enhanced coverage and capacity as well as new 5G service provision to ensure that customers experience access to the latest technologies currently available. The installation will also meet the extra demands on the network in this area as new technologies improve increasing the demand for 4G and 5G technologies.

The existing site is located within the grounds of Little Walstead Farm, positioned in a rural setting to the east of Lindfield. It sits within an area of open farmland and woodland, accessed via a network of private tracks branching from local lanes. The site is surrounded by fields and mature trees, with scattered farm buildings nearby, and is well separated from the main residential areas to the west, which are concentrated around Lindfield village. Given its rural location and set away from the main residential clusters, the site remains a suitable and low-impact location for telecommunications infrastructure and the upgraded equipment is not expected to give rise to any adverse impact on the surrounding amenity.

This application seeks permission for:

The removal of the existing headframe, 2no. antennas, ancillary equipment and 3no. cabinets; the installation of a new headframe supporting 6no. antennas, ancillary equipment and 2no. 0.3m dishes, the installation of 2no. cabinets and development works thereto.

The site is shown below:



Please see section below for the proposed dimensions, materials and colours.

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Enclose map showing the cell centre and adjoining cells if appropriate:
Please see enclosed coverage plots which accompany this application. These demonstrate a significant effort to improve upon the existing coverage pattern.

Type of Structure (e.g. tower, mast, etc): Mast	
Description:	
The removal of the existing headframe, 2no. antennas, ancillary equipment and 3no. cabinets; the installation of a new headframe supporting 6no. antennas, ancillary equipment and 2no. 0.3m dishes, the installation of 2no. cabinets and development works thereto.	
Overall Height:	23 Metres (to top of antennas)
Height of existing building (where applicable):	N/A Metres
Equipment Housing: EFF1 cabinet	
Length:	0.831 Metres
Width:	0.705 Metres
Height:	2.068 Metres
Equipment Housing: EFF2 cabinet	
Length:	0.600 Metres
Width:	0.750 Metres
Height:	1.800 Metres
Materials (as applicable):	
Tower/mast etc – type of material and external colour:	Headframe - Galvanised metal
Equipment housing – type of material and external colour:	Cabinets – metal - Green

Reasons for choice of design, making reference to pre-application responses:
A replacement antenna head frame is required in this location to provide upgraded coverage and capacity to the locality.
The proposed upgrade to an existing installation is in accordance with the sequential approach to site selection criteria set out within the Code of Practice for Wireless Network Development in England (2022) and is encouraged within the National Planning Policy Framework (2024) over the development of a, separate, new telecommunications site.

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The site is needed to provide enhanced coverage and capacity service to ensure that customers experience access to the latest technologies currently available. The installation will also meet the extra demands on the network in this area as new technologies improve increasing the demand.

The proposed development has two main elements, the monopole which supports the antennas and the microwave dishes, and the ancillary equipment (including equipment cabinets). All are required to successfully deliver mobile phone signal to a locality.

The design and type of equipment to be deployed in this case has been chosen to balance the technical requirements of the operator whilst seeking to minimise, so far as technically practicable, the impact of this proposed installation upgrade upon the area.

The proposed upgrade design seeks to replicate the existing configuration – a new headframe supporting 6no. new antennas, 2no. dishes and ancillary equipment to be mounted on the existing monopole sited in the same compound. This application does not seek to move the location of the installation. The proposed headframe has been selected-as it can be installed on the mast that is already in place – an open headframe supporting an increased number of antennas. The additional dishes will be mounted below the antennas and are needed to create a network. This design continues to be the most appropriate for this location as it is capable of supporting the amount of equipment required.

Under this proposal, the existing 2 antennas and associated equipment will be replaced with 6 antennas and ancillary equipment, all mounted on the new headframe. The larger headframe is necessary to support the weight and size of the upgraded antennas. The ancillary equipment will be mounted behind the antennas on the headframe to optimise their performance and improve operational efficiency.

At the ground level, 3 cabinets will be removed, and 2 new cabinets will be mounted within the existing fenced compound.

A slight increase in height of approximately 0.6m (to top of the antennas) is proposed within this application to ensure that signal is able to over-sail surrounding vegetation and any built form, providing improved coverage and connectivity to the area and enabling the required coverage to reach the target coverage area. The top of the installation will be slightly bulkier due to the differences between the existing antennas and modern antennas which require a new wider headframe. The new equipment will also improve coverage in the area for the existing 3G and 4G technologies.

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Given that the height of the mast is broadly the same as the existing, the top of the mast will be slightly more visible than it currently is, albeit the views from the adjacent road are obstructed by the vegetation along the road. Views from the wider area are screened by, and filtered through, the mature trees bordering the green field and also by the buildings in the form of houses and agricultural outbuildings.

The upgraded installation requires a larger headframe than the existing. This is required to account for the weight of the additional equipment. Modern antennas are larger and much heavier than previous antennas. They therefore require a more robust headframe to accommodate their size and weight. The existing headframe cannot be reused for these reasons and must be replaced with a new one to take account of these technical and operation requirements and every effort has been made to replicate the scale of the existing scheme as much as possible.

The finish of the mast is proposed to be galvanised as is the existing. The applicant would however be open to amending the proposed colour if considered necessary or appropriate by the Council.

In all aspects of the design the smallest practical components have been utilised to ensure that the visual impact of the development is kept to a minimum and to streamline the design as much as possible. It should be noted that telecommunications development is subject to a number of technical constraints and that the selected design has been chosen to balance both the technical requirements of the operator and technical performance, with the planning considerations and impact on visual amenity.

Health and Safety - including ICNIRP compliance

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, VMO2 Limited 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 VMO2's network, the radio base station that is the subject of this application will be configured to operate in this way.

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

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

4. Technical Justification

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

As part of VMO2's continued network improvement program, there is a specific requirement to upgrade the existing radio base station at this location to maintain/enhance the coverage in the area. An existing telecommunications site has been identified; however, the current equipment cannot accommodate the latest requirements. As such, the equipment needs to be replaced in order to implement this upgrade to VMO2' services.

The site upgrade is needed to provide enhanced coverage and capacity as well as new 5G service provision to ensure that customers experience access to the latest technologies currently available. The installation will also meet the extra demands on the network in this area as new technologies improve increasing the demand for 4G and 5G technologies.

Mobile connectivity and service is required where customers live, work and play.

The increasingly high level of mobile phone use and ownership within the UK population is a very clear indication of the public's overwhelming acceptance of the benefits of mobile communications, which requires the installation and maintenance of base stations to provide the necessary connection between the mobile phones and the UK telecommunications network.

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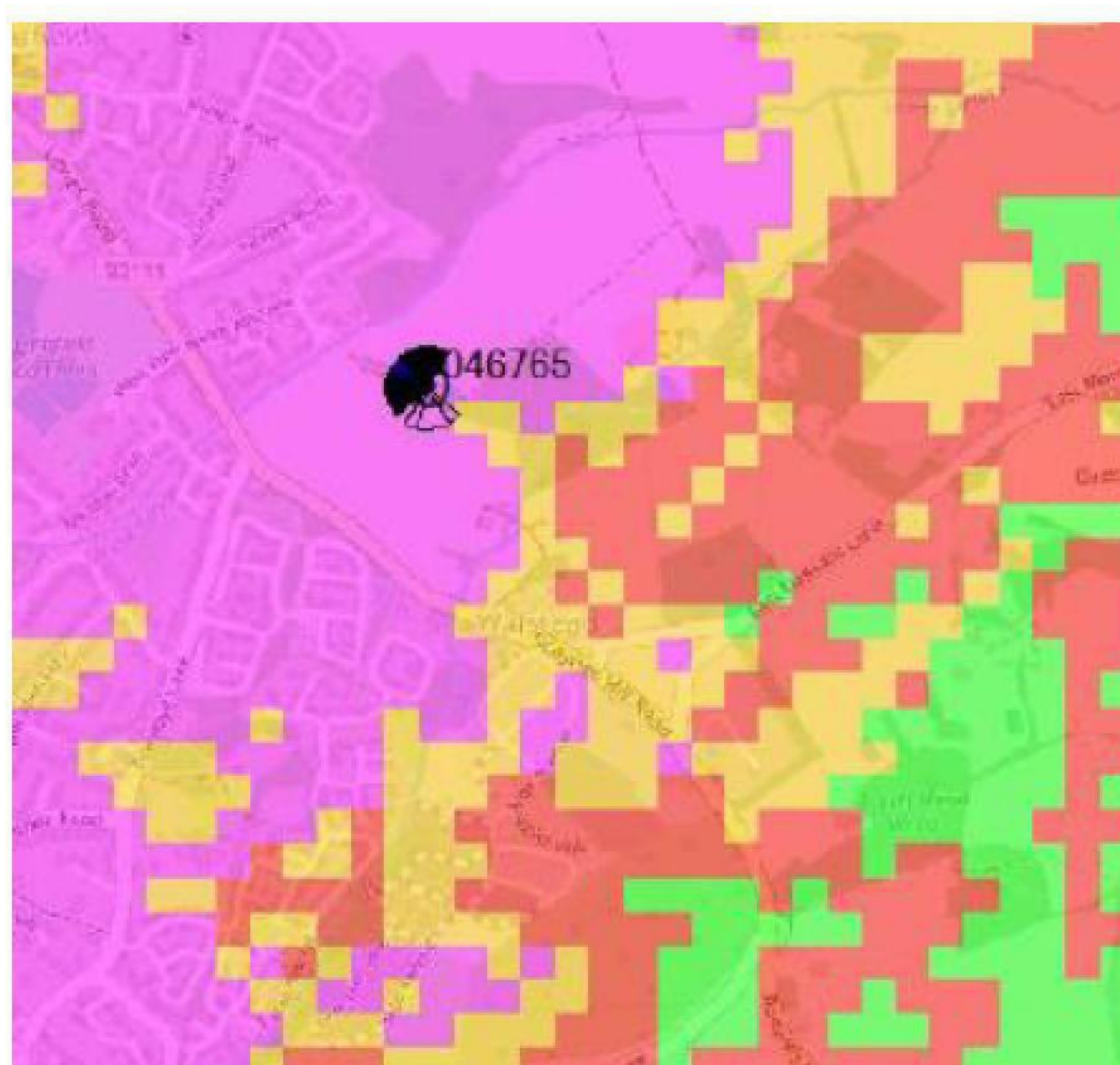
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Base stations use radio signals to connect mobile devices and phones to the network, enabling people to send and receive calls, texts, emails, pictures, web, TV and downloads. Without base stations, mobiles will not work. They are made up of three main elements. The cabinets which contain the equipment used to generate the radio signal. The supporting structure such as a mast, which holds the antennas in the air and the antennas themselves. Only the antennas emit radio signals.

Many other everyday items also use radio signals to send and receive information, such as television and radio broadcasting equipment and two-way radio communications. Base stations are connected to each other and telephone exchanges by cables or wireless technology such as microwave dishes, to create a network. The area each base station covers is called a cell. Each cell overlaps with its neighbouring cells to create a continuous network. The size and shape of each cell is determined by the features of the surrounding area, such as buildings, trees and hills, which can block signals. When people travel between cells, the signal is transferred between base stations without a break in service. Each base station covers a certain area only and can only handle a limited number of calls at once. As mobile phones and devices become more popular more base stations are needed to ensure continuous coverage.

This application is supported by existing and proposed coverage plots. These demonstrate significant improvement in coverage from the existing installation in this location with large areas of the proposed coverage plots turning pink demonstrating the provision of a high-quality signal strength comparable to that of dense urban coverage. A copy of these is shown below for ease however the original document enclosed with this application should be referred to.

Existing coverage plots:



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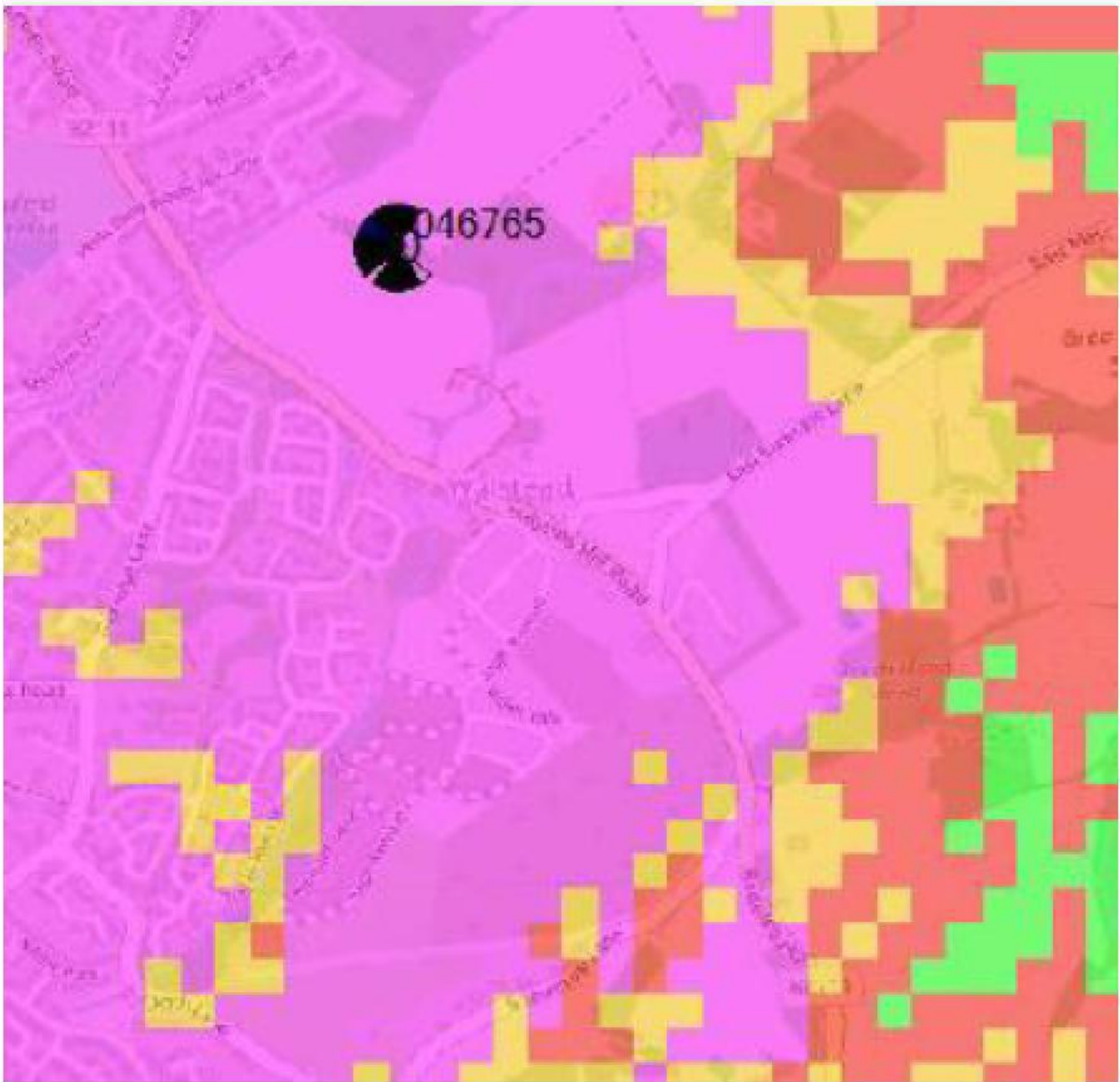
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Proposed coverage plots:



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)

Site Type	Site name and address	National Grid Reference	Reason for not choosing site
D1 Existing site	Existing site at Little Walstead Farm, Walstead Grange, Lindfield Rural, Mid Sussex, RH16 2QQ	535345, 124962	This existing mast is owned by a different operator. A share on this tower would require an increase in height in excess of the height of the existing O2 mast. As such a share on this tower has been discounted in favour of revising the head frame on the existing O2 tower.
D2 Greenfield	GF at East Mascalls Lane, Walstead Grange, Lindfield Rural Mid Sussex, RH16 2QS	535560, 124557	The proposed location would adversely affect visibility for vehicles exiting onto Scaynes Hill Road, resulting in highway safety concerns. This option has therefore been discounted.

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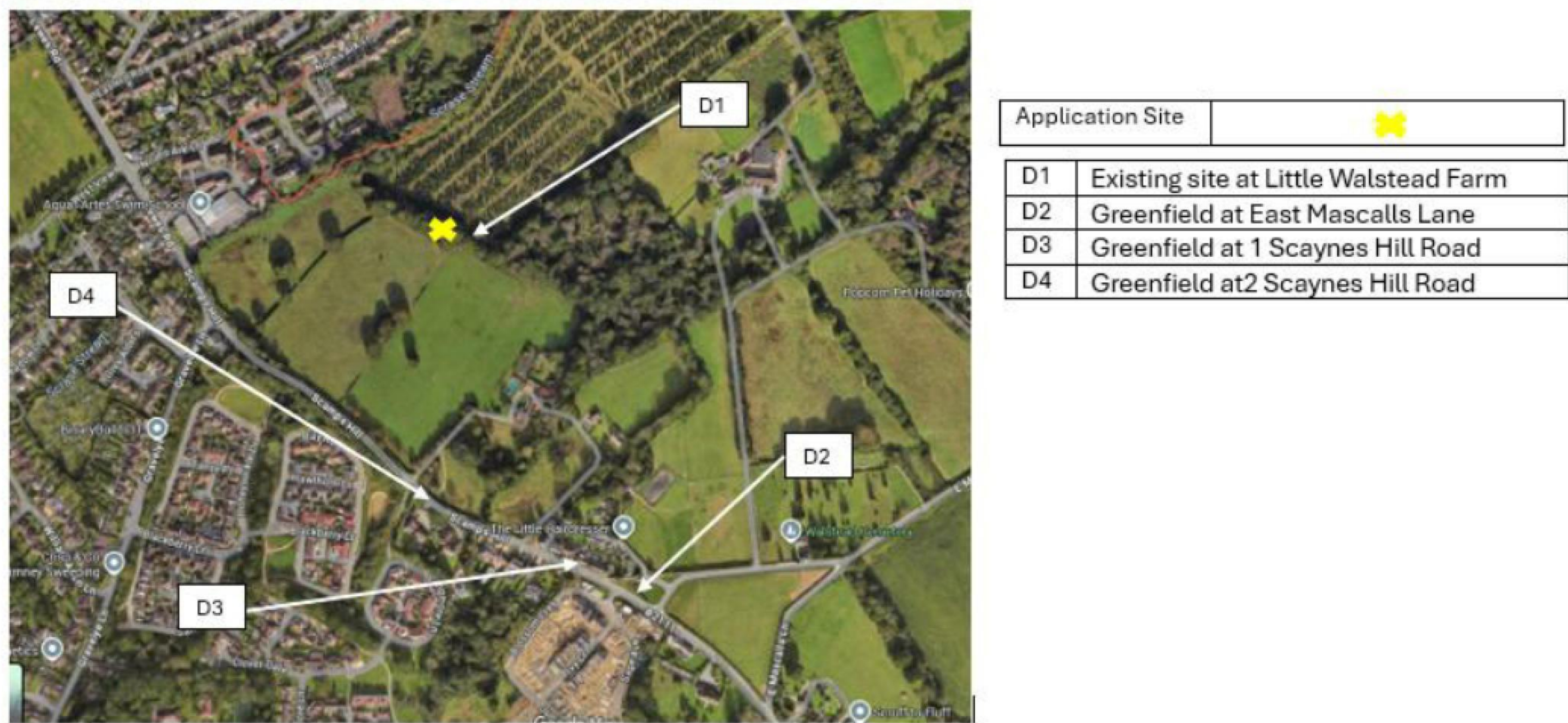
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D3 Greenfield	GF at 1 Scaynes Hill Road, Walstead Grange, Lindfield Rural, Mid Sussex, RH16 2QQ	535463, 124603	A proposed site in this location has been discounted due to insufficient space the house the operator's apparatus.
D4 Greenfield	GF at 2 Scaynes Hill Road, Walstead Grange, Lindfield Rural, Mid Sussex, RH16 2QQ	535301, 124672	A proposed site in this location has been discounted due to insufficient space the house the operator's apparatus.

Fig 1 – Map of discounts



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

N/A – Alternatives and discounted options set out above.

This application seeks to upgrade an existing site which has been positioned to ensure the most effective delivery of mobile phone signal to the locality. The proposed scheme, whilst wider than the existing installation is still considered to be acceptable given the existing land use and is therefore considered suitable in siting and appearance terms, given the context of the surrounding area.

Land use planning designations:

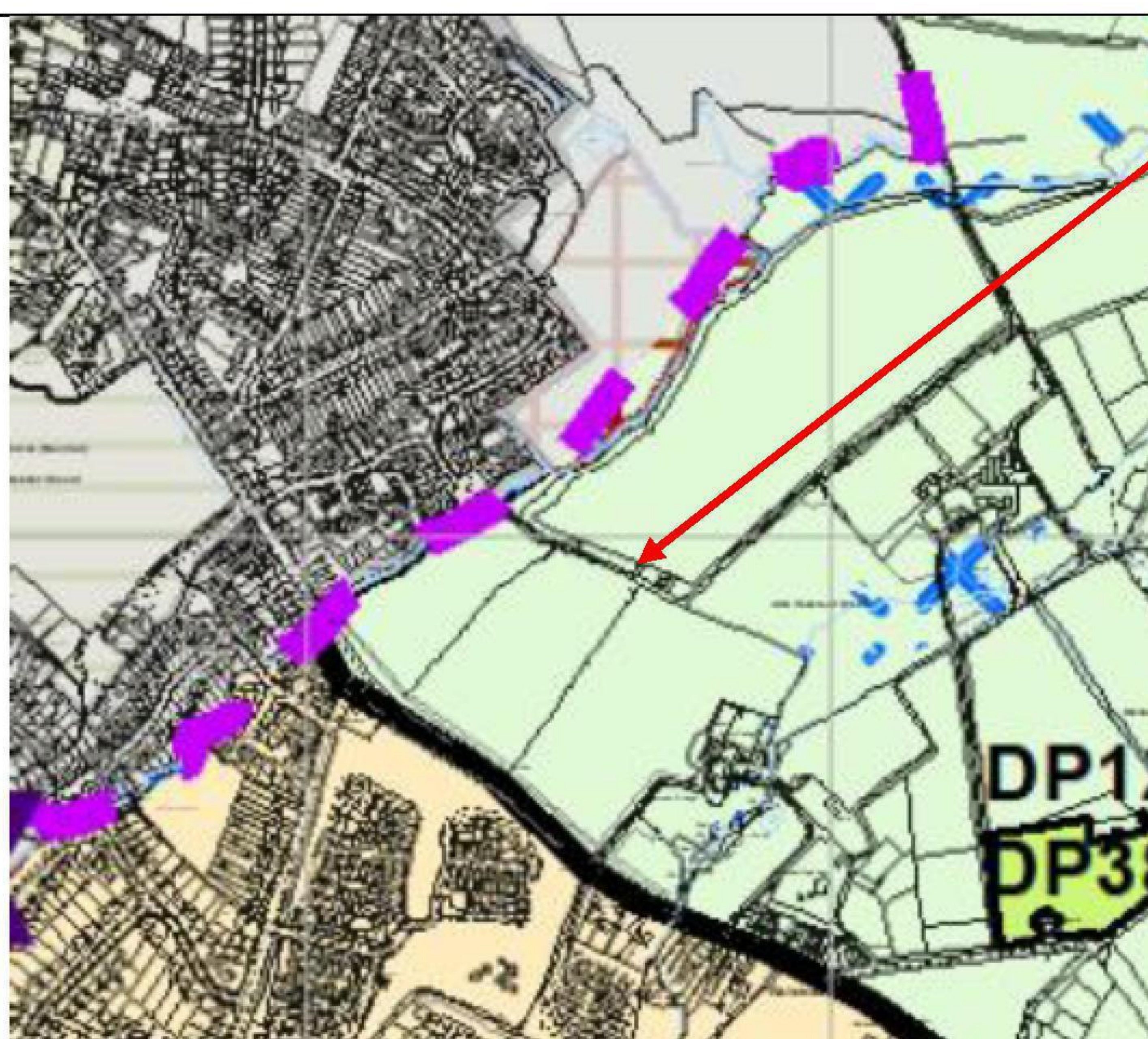
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Site location

The site is located within Protection and Enhancement of Countryside area.

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

Planning Policy Review Relevant Planning Policy

The following documents are considered relevant to the assessment of this application:

- The Town and Country Planning (General Permitted Development) (England) (As Amended) - Schedule 2, Part 16
- National Planning Policy Framework (2025) – Chapter 10
- National Planning Policy Guidance
- Mid Sussex District Plan 2014-2031 – Policy DP23: Communication Infrastructure

Other relevant documents:

- The Code of Practice for Wireless Network Development in England (2022) – Published by DCMS – this document sets out the legal and policy framework for the delivery of wireless infrastructure development. It also provides design guidance and advice for local planning authorities when determining applications.

Schedule 2, Part 16 of the GPDO

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Schedule 2, Part 16 of the GPDO relates to the Prior Approval process for telecommunications development. This legislation has established the principle of telecommunications development. Prior Approval is therefore only assessed on the basis of siting and appearance. The development plan and NPPF (2024) is therefore only considered relevant in as far as it relates to the matters of siting and appearance.

Adopted Mid Sussex District Plan 2014-2031

Policy DP23: Communication Infrastructure

“Strategic Objectives: 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.

Evidence Base: Coast to Capital Strategic Economic Plan, Greater Brighton City Deal, Gatwick Diamond Strategy; Mid Sussex Economic Development Strategy, A Strategy for the West Sussex Landscape.

The Council will encourage the incorporation of digital infrastructure including fibre to premises, in major new housing, employment and retail development.¹²

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 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;

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- 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."

National Planning Policy Framework (2024)

The Government's National Planning Policy Framework came into force in 2012. The guidance has most recently been revised in February 2025. The NPPF sets out the Government's planning policies for England and how these should be applied.

The Government's latest thinking continues to strongly support communications infrastructure. The NPPF remains very supportive of high-quality communications. Indeed, a whole chapter (Chapter 10) is dedicated to high quality communications, emphasising the importance that the Government attaches to digital connectivity.

Paragraph 119 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 supports the expansion of telecommunications 'Planning policies and decisions should support the expansion of electronic communications networks'... (para 119).

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

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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. 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 into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential'

Public benefits are defined within Planning Practice Guidance (para 020 Reference ID: 18a-020-20190723) as anything that delivers economic, social or environmental objectives as described in the NPF under paragraph 8 (2024). The PPG states that public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.

The proposed development accords with all these aspects of the NPPF in that it will provide improved network provision within this area, bringing a range of associated economic and technical benefits.

In order for the UK to benefit from the huge potential of a reliable mobile network, Local Planning Authorities will have to weigh the Public Benefits of such connectivity

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with the requirements to instruct and manage the built environment. Central Government understands that this may present concerns with the various design solutions proposed but it is important that all Local Planning Authorities understand the technical needs of the network and better understands the wider advantages of such new technology.

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

The Code of Practice provides guidance to Code Operators 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. 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.

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

Paragraphs 8 -11 of the Code of Practice set out the importance of connectivity:

'Digital connectivity is vital to enable people to stay connected and businesses to grow. Fast, reliable digital connectivity can deliver economic, social and well-being benefits for the whole of the UK.

As the demand for mobile data in the United Kingdom is increasing rapidly, it is important that everyone has access to dependable and consistent mobile coverage where they live, work and travel.

The Future Telecoms Infrastructure Review (FTIR) and the National Infrastructure Strategy set out the government's long-term strategy for meeting its digital connectivity targets and delivering high quality, reliable digital infrastructure that works across the UK2.

The government has committed to extending mobile coverage across the UK. The government's Levelling Up White Paper has set a mission that the UK will have nationwide 4G coverage, with 5G coverage for the majority of the population by 2030. In support of this, the government and the UK's mobile network operators agreed a £1 billion Shared Rural Network deal to extend 4G mobile geographical coverage to 95% of the UK by the end of the programme.

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Paragraph 13 of the Code of Practice acknowledges the role of the planning system in the delivery of digital infrastructure:

'The planning system plays a key role 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 18 of the Code of Practice sets out the principles and commitments that operators should follow when developing their networks inter alia:

- Site sharing and use of existing structures: make use of existing structures, sites and masts wherever possible to reduce the need for new development.
- Consultation with local planning authorities, local communities and other stakeholders 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.
- Compliance with guidance laid out in the International Commission on Non-Ionizing Radiation (ICNIRP) public exposure levels guidance.

The Code of Practice also sets out the requirements of the LPA in relation to the deployment of digital infrastructure:

- 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.

Paragraph 22 of the Code of Practice acknowledge the limitations to siting and design:

'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'.

Paragraph 23 goes on to advise that telecommunications development is sustainable development and should be supported:

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'There should be a presumption in favour of facilitating sustainable network development and, as such, operators and local planning 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'³.

The Code of Practice explains the operators site selection and that they use a range of sophisticated, computer-based planning tools to predict levels of signal strength and coverage from sites for 2G, 3G, 4G and 5G. For a site to be suitable it needs to have 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. It acknowledges that operators typically look to upgrade existing infrastructure prior to considering a new deployment.

The Code of Practice sets out general siting and site selection principles including (para 25):

'where possible operators should look to use existing buildings/structures for hosting wireless infrastructure, to reduce the environmental impact of installation. Where the erection of a new ground-based mast is required, operators should seek measures to reduce the impact of the development, where possible. For example, measures such as siting near similar structures, screening, and using simple designs and appropriate colouring can help reduce the impact of the new infrastructure in certain locations'.

A balanced approach is sought between the technical needs and constraints of the proposed site and the potential impact of the development (para 26 of the Code of Practice). There are three technical and operational considerations for the installation of sites:

- **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 demand for network capacity in a particular area, additional sites may be required within that coverage area to meet the demand.

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.

The Code of Practice states that planning authorities should consider these issues and consider the need for a site within a limited search area alongside the public benefit

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of improved connectivity. In general, it should not, therefore, be appropriate for planning authorities to seek wider evidence of alternative sites (beyond that required by the NPPF), unless they consider the proposed development is unacceptable having regard to the relevant material planning considerations.

The Code of Practice notes there are factors which affect the type of infrastructure that will be deployed including location and the coverage and capacity requirements. Planning authorities should be aware of these constraints when considering proposals.

Planning Assessment

Principle of Development

This is a prior approval application. As such, the only issues that can be considered when assessing this application are the siting and appearance of the proposed telecommunications monopole and cabinets. The principle of development is therefore not an issue of consideration for this prior approval application.

Notwithstanding this, it is useful to highlight the following paragraphs of the National Planning Policy Framework:

The NPPF directly addresses the need for enhanced wireless communication services, at paragraph 20, which states that an LPA's strategic policies must make sufficient provision for:

b) infrastructure for transport, telecommunications (our emphasis), security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)"

Chapter 10 [Para's 119-123] (Supporting High Quality Communications) is most relevant to this application.

Paragraph 119 states that "Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections".

Paragraph 120 states that "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. Use of existing masts, buildings and other

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structures for new electronic communications capability (including wireless) should be encouraged".

It should be noted that **paragraph 123** states that "Local planning authorities must determine 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".

This proposal seeks to upgrade the electronic communications network to provide advance, high quality and reliable communications infrastructure in accordance with para 119 of the NPPF. This development is proposed following an identified need for improved coverage to meet customer demand, to ensure the efficient operation of the network and provide reasonable capacity for future expansion. The operator has taken a sequential approach to development and has explored the use of existing masts, sites and buildings. In this instance it has been possible to locate and upgrade an existing installation to meet with requirement in accordance with para 120 of the NPPF.

The proposed upgrade of the existing telecommunications mast is fully in accordance with both national and local planning policy objectives, which seek to promote high-quality digital infrastructure as an essential component of sustainable communities. The development accords with Policy PSP36 of the South Gloucestershire Policies, Sites and Places Plan, which supports the enhancement of electronic communications networks where opportunities for mast-sharing and existing site use are maximised. The proposal also aligns with the strategic aims of the South Gloucestershire Core Strategy (Policies CS1 and CS6), which encourage the delivery of modern infrastructure to support economic growth and community well-being. By upgrading an established installation rather than introducing a new site, the scheme minimises visual and environmental impacts while providing significant improvements to network coverage and capacity in Yate and the surrounding area. The proposal therefore represents sustainable development consistent with the aims and objectives of the Local Planning Authority.

Design and Appearance

As set out above, this is an established site which is already providing coverage for this area for VMO2. The proposed development seeks to provide improved coverage and capacity to the locality for the operator including the provision of new 5G coverage.

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The upgrading of an existing site is in accordance with the sequential approach to development set out within the NPPF (2024). Para 120 states *"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. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged"*. This is also in accordance with the aims of Policy DP23 which states: *"Preference will be for use to be made of existing sites rather than the provision of new sites."*

The upgraded site is proposed in the same location as the existing where the principle, siting and appearance of telecommunications development has been established. The proposed development, which has been designed to meet both technical/operational requirements and planning considerations, has been reviewed in the context of the existing site and surrounding area, and is still considered to be appropriate in character and amenity terms for this location.

The proposed upgrade is essential to support the provision of high-quality digital infrastructure, enhancing 4G across the area. This aligns with Policy DP23 of the Mid Sussex District Plan, which encourage the delivery of modern digital infrastructure that supports sustainable growth and community connectivity.

With regard to appearance, the proposed design has been selected following an onsite design visit and seeks to replicate, so far as practicable, the existing design whilst taking into account modern requirements. The installation remains of a slimline monopole design with an open headframe and accompanying cabinets. The new dishes will be mounted below of the antennas on the new headframe and the new cabinets will be mounted close to the existing within the compound. These are required for technical performance but are proportionate in size to the wider scheme and will be read in the context of the upgraded monopole and equipment.

A replacement headframe of increased width is required at this location to deliver enhanced coverage and capacity to the locality, in accordance with Local Plan objectives for the provision of modern telecommunications infrastructure. The upgraded equipment is heavier than the existing installation and requires a more robust supporting structure to meet current technical and operational requirements. As a result, the top of the mast will appear marginally bulkier due to the size and specification of modern antennas. The existing headframe cannot be reused, as it is not capable of supporting the weight or configuration of the proposed equipment, and a narrower headframe would be insufficient for this purpose. 2 additional dishes are to be mounted below of the antennas and 2 replacement cabinets installed within the compound.

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The upgraded installation would also be wholly contained within the existing site compound.

The height of the mast has been slightly increased by 0.6m because of the differences between the old and modern antennas. The height has been increased from 22.4m to 23m, to be able to achieve the required levels of coverage to the wider area and to address technical constraints.

This is the lowest possible height which can still deliver the required levels of mobile phone coverage and connectivity to the locality due to technical constraints and seeks to protect the character of the area through the selection of the least detrimental design in accordance with Policy DP23.

A more robust headframe is therefore required to allow effective coverage to be provided by the upgraded installation. New equipment is being proposed across the country to accommodate the delivery of improved coverage and take account of this technical constraint to development.

The existing site benefits from being located within Little Walstead Farm, a secure and established agricultural setting that provides an appropriate context for telecommunications infrastructure. The mast is positioned within the farm complex and is set well back from the public highway, with access gained via private farm tracks. The surrounding farmland, woodland belts, and mature vegetation provide effective screening, helping to limit wider visibility from public viewpoints. The presence of adjacent farm buildings and existing rural infrastructure also provides a contextual backdrop, reducing the perceived prominence of the mast within the landscape. While the replacement structure will be marginally taller than the existing installation, it will remain sufficiently separated from nearby residential properties to safeguard local amenity. The upgraded mast will therefore be read as part of the established farm complex and associated infrastructure, ensuring it integrates appropriately within its rural surroundings.

It is considered that the proposed development would not result in harm above and beyond that which has already been accepted and would bring significant public benefit with regard to improved connectivity to the area.

While the proposed upgrade will introduce a marginal increase in height, it is not considered to unacceptably harm the character or appearance of the area. The development provides essential public benefits through the delivery of enhanced 4G and 5G coverage, supporting the Government's and the Council's objectives for improved digital connectivity.

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Balancing siting and appearance of mobile phone masts against operational efficiency can be challenging, and every effort has been made in this case to ensure that the mast is proposed in the best possible location and is of the best possible appearance given the technical and planning constraints which exist. It should be acknowledged by the LPA that operators are limited on the options for where equipment can be located and how it appears.

It is considered that the proposal utilises the most suitable design available to meet coverage demands and to provide suitable coverage. It is important to keep the impact of telecommunications development in the area to a minimum and it is considered this proposal achieves this. The benefits of the proposal also have to be considered. The provision of enhanced coverage, capacity and connectivity would be provided for VMO2 users. It is considered the significant public benefits of the proposal outweigh the minimal impact on the surrounding area.

Having regard to the assessment above, the proposed development has been sited and designed in accordance with national guidance, including the telecommunications industry's Code of Best Practice for Wireless Network Development in England (2022), and is consistent with the criteria set out in Policy DP23 of the Mid Sussex District Local Plan. The proposal supports the Local Plan's objectives to facilitate the delivery of high-quality communications infrastructure in a manner that safeguards visual amenity, respects the character of the rural and built environment, and contributes to sustainable economic growth and community connectivity across the district.

The Importance of improved mobile connectivity and public benefits

Mobile telecoms networks are now ubiquitous throughout the UK. Individuals and businesses expect to be able to connect and use their mobile device whenever and wherever they so require. Access to quality mobile communication services is an essential utility for the residents, businesses and for commuters that travel through an area daily.

High quality communications infrastructure is essential for sustainable economic growth. Mobile connectivity allows business to be carried out on the move, enables access to information and services anywhere, and opens new opportunities and markets. Telecommunications networks also play a vital role in enhancing the provision of local community facilities and services.

The critical nature of these services was made ever more apparent during the Coronavirus pandemic. The June 2022 'Online Nation Report' (OFCOM) highlights this, finding that *"The global pandemic since March 2020 has resulted in significant changes in online behaviour; in particular, our online shopping habits that developed*

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during lockdown periods appear to be here to stay. Overall, online companies grew in 2021. The largest online platforms' revenues and profits increased significantly during the lockdown periods and this growth continued in 2021. The growth is being driven by UK consumers' increasing spend on e-commerce and entertainment subscription services, while advertising revenues are also increasing with the continuing brand migration to online".

The Online Nation Report (Ofcom, November 2024) shows a continuing and increasing reliance on telecommunications and the services it provides for as part of everyday life.

The report found that the average UK adult spends 4 hours and 20 minutes a day online across smart phones, tablets and computers. Three quarters of the time spent online per day in May 2024 by UK adults was on smart phones. Two-thirds (67%) of online adults agree that for them the benefits of being online outweigh the risks. Ofcom's research showed how being online can provide adults with opportunities for connection, education, entertainment and creativity. Seven in ten adults (72%) agreed that being online had helped them to learn a new skill, and 77% agreed that being online had helped them broaden their understanding or view of the world. Over half of UK online adults visited NHS online in May 2024. On an average day 35% of UK online adults visited Amazon, the UK's leading online retailer with 88% (41.5million of UK online adults visiting in the month of May 2024.

Ofcom's 2024 communications market report (interactive data published in July 2024) also reaffirms the importance of mobile technology in the UK. The average monthly data volumes per mobile data user increased by 1.7 GB (21%) to 9.9GB per month in 2023. Across all mobile users, average monthly data consumption was 8.8GB, also a 21% increase year on year. The total number of mobile subscriptions also increased by 4% to 116.1 million in 2023. The largest year on year increase was 2.6 million for mobile phone subscriptions.

It is clear therefore from a factual and research backed perspective that there is a continuing need for the provision of mobile services and data-based technologies, such as 4G (provided by this proposed development) and that these are increasingly important to our everyday lives year on year.

The latest Ofcom Connected Nations 2025 report – the UK's authoritative annual assessment of broadband and mobile network coverage – shows that mobile connectivity across the UK continues to expand, with 4G coverage from at least one mobile network operator now reaching approximately 96 % of the UK landmass, and good outdoor 4G coverage available across the vast majority of areas at varying confidence levels, reflecting widespread geographic availability of 4G services essential for reliable mobile voice and data connectivity. Indoor and rural premises

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coverage remains lower than urban areas, illustrating persistent connectivity gaps in more remote locations. The report also highlights the role of collaborative programmes such as the Shared Rural Network, which have driven significant improvements in 4G coverage particularly in rural areas, while further deployment and network investment are ongoing to reduce remaining not-spot areas. These findings demonstrate clear national and local policy imperatives to support infrastructure that delivers consistent 4G coverage and underpin the need for replacement mast development to enhance continuous mobile service provision.

In 2021, Matt Warman MP, the previous minister for Digital Infrastructure, wrote to English Local Authority Chief Executives. The letter dated 24 May 2021 accompanied the 'Consultation on Changes to Permitted Development Rights for Electronic Communications Infrastructure' within which he states:

"Digital connectivity is – now, more than ever – vital to enable people to stay connected and businesses to grow. The demand for mobile data is increasing rapidly, and the COVID-19 pandemic has highlighted how important it is that we all have access to reliable, high quality mobile connectivity...The planning system plays a key role in delivering the infrastructure that we need as households and businesses become increasingly reliant on mobile connectivity."

This has since been supported by the more recently written letter to Council Leaders and Executives in November 2024 from Chris Bryant, Minister of State (Department for Science, Innovation and Technology) in which it is acknowledges as follows:

"Fast and reliable digital connectivity is increasingly important to our way of life. As people increasingly rely on their devices to work, learn and stay connected with each other, demand for greater speeds and more reliable connectivity is growing. Better digital connectivity is also key to delivering faster economic growth and increasing social inclusion."

The Government is committed to supporting the delivery of next-generation connectivity to communities across the UK by driving towards nationwide gigabit broadband and 5G coverage by 2030.

We need your help to achieve these goals. Broadband and mobile rollout rely heavily on local authorities prioritising digital infrastructure and placing it at the heart of their wider Place strategy".

Upgrading digital telecommunications is evidently a key Government priority and one that is also set out in detail in the NPPF (2024) and summarised within the DDCMS Connected Growth Manual (2019). Providing improved coverage in this location will bring substantial public benefits which have been set out in brief above.

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Some of the ways in which improved connectivity and coverage can provide public benefit are set out below:

Greater consumer choice – allows access to a greater range of goods and services through access to online shopping and the ability to search for the best deals on products and services

Access to online services – as business and services move more online a reliable connection is hugely important. The increased levels of connectivity allow for access to services such as online banking, public services and smart metering for utility services.

Social connectivity – Improved coverage and connectivity allows people to stay connected with family and friends even from afar.

Remote working and studying – particularly in areas where reliable superfast broadband connections are not yet established, improved mobile connectivity can give access to opportunities for remote working and studying which would otherwise not be available.

Entertainment – Improved connectivity allows for better access to news, TV, music and social media.

Supporting businesses – allowing for access to services such as cloud storage / computing, card machine services and general day to day business services.

Health and wellbeing - Through improved mobile connectivity, patients can see healthcare professionals quicker and more efficiently via online appointments and prescription services. The ability to access these services from any location will result in cost and resource savings; less time will need to be taken off work to attend appointments and there will be reductions in the amount of time travelling to and from appointments. Mobile connectivity will allow patients to access information on symptoms and medical conditions, as well as access to support groups and those with similar conditions. Family members and caregivers can benefit from mobile connectivity by providing access to information and support, helping them and those they care for, live more independently and hopefully result in less time spent in medical facilities. Mobile connectivity can offer access to a range of health apps which can be accessed on the go. These can include functions such as reminders for patients to take their medication, book a recurring appointment with a specialist, or renew prescriptions; and many are a source of information on diet, exercise and ways to live a healthier lifestyle. Healthcare professionals will have better access to the tools and services they need to treat patients in remote areas away from surgeries,

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hospitals and care centres. Improved network coverage can provide mobile connectivity, which could enable them to access patient data on the go, accelerating response time and treatment decisions. They could instantly access patients' prescriptions and other vital information, allowing them to collaborate with other medical staff and delegate care more effectively. There are also many safety benefits of having a reliable 4G connection which contribute to a better sense of wellbeing. Knowing there is a connection and the ability to communicate with others in times of need provides reassurance.

Reduce environmental impact - there are long term sustainability benefits of being better connected. Improved mobile connectivity will assist in the development of smart technologies. Smart transportation, smart buildings, smart manufacturing and smart agriculture can all help facilitate emission reductions, whilst improving quality of life and supporting economic growth.

Supporting tourism - Improved connectivity has the ability to positively influence visitor experiences through the use of mobile apps. This could be a virtual tour guide, or an app that shows local events, it could be the ability to scan QR codes, or even offer immersive content through augmented reality. Mobile connectivity is needed to make these digital offerings work and improved connectivity will make sure these options are available.

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.

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

Cornerstone Industry Site Specific Supplementary Information (England) V.9 – 22.03.2024

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Cornerstone Telecommunications, Infrastructure Limited,
Hive 2, 1530 Arlington Business Park, Theale, Berkshire, RG7 4SA.

Registered in England & Wales No. 08087551.

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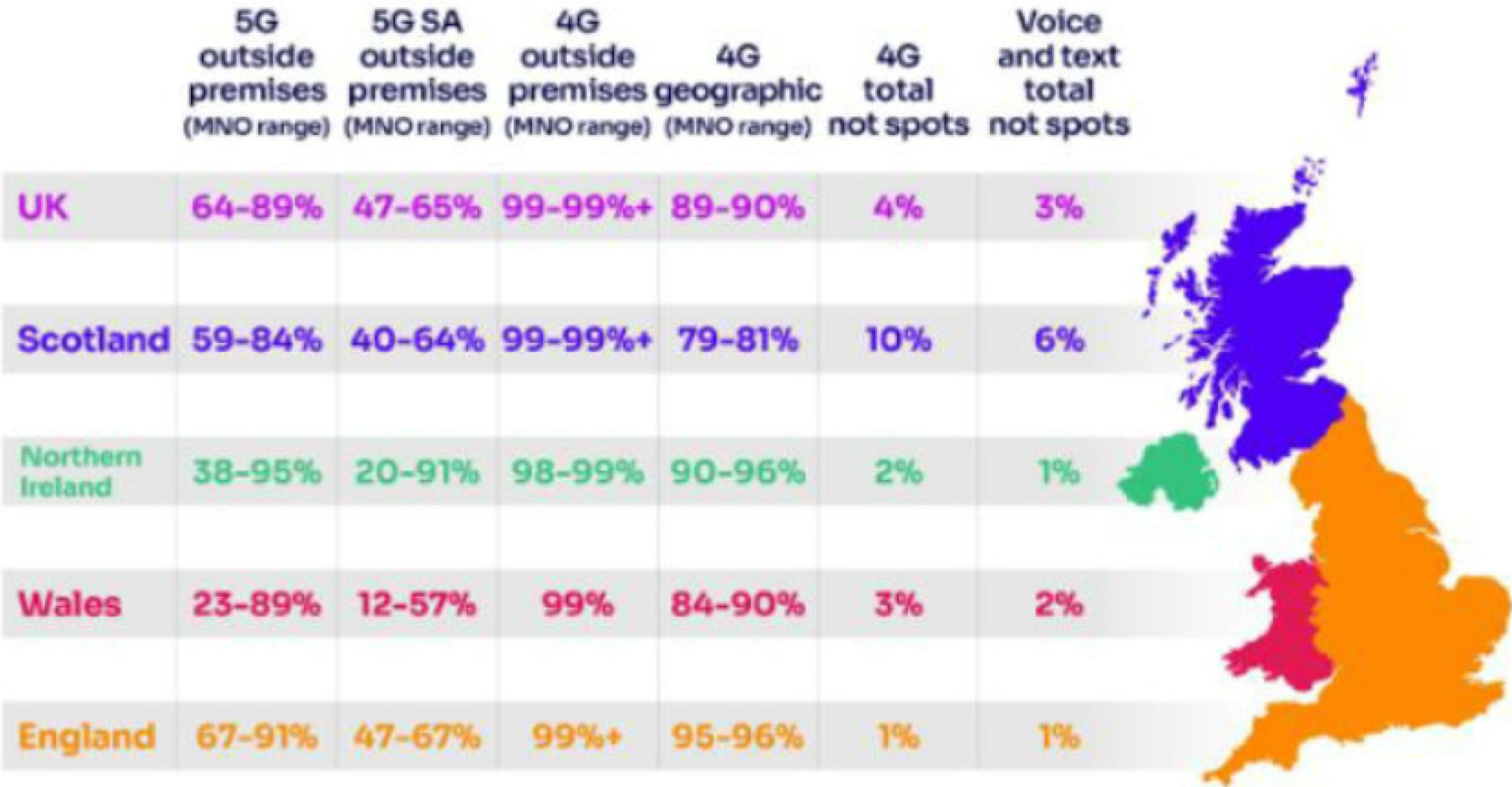
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Figure 3.1: Overview of voice and data coverage across the UK and UK nations ³⁷



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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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 England.

<https://www.ofcom.org.uk/phones-and-broadband/coverage-and-speeds/connected-nations-interactive-report-2025>

As shown in the figures above, 67% of the England area has access to 5G at a high confidence level from at least one operator, and 77% has access at a very high confidence level. However, these figures drop significantly to 14% and 2% 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

Summary

National planning policy is to facilitate the growth of new and existing telecommunications systems, and operators have obligations to meet customer demands for improved quality of service. This development proposes improved connectivity and capacity now and for the future by way of a replacement/upgraded telecommunications mast and equipment.

This development proposes improved coverage to the surrounding area including the introduction of new 5G coverage for VMO2, to meet an identified need.

There is a clear and demonstrable requirement for improved electronic communications services. Due consideration has been given to all practicable solutions for providing the required telecommunications service and this proposal has been designed in such a way as to minimise its overall visual impact upon the local area by ensuring the services can be provided from a single site, with any minor negative impact outweighed by the benefits of providing a high quality electronic communications services which caters for coverage and capacity and allows for reasonable future expansion as acknowledged as acceptable within the NPPF.

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The proposal represents an appropriate siting and design solution for this area, balancing environmental and planning considerations. A simple design solution is proposed to mitigate visual impact and prevent significant harm to the local environment. The minimal impact of replacing and upgrading the existing development would be outweighed by the significant public benefits of providing improved coverage to the area.

The proposed development is compliant with the relevant policies from the NPPF, Code of Practice for Wireless Network Development in England (2022) and the Adopted Mid Sussex District Plan 2014-2031. The proposal is fully compliant with ICNIRP guidelines and declaration of compliance has been provided.

As such, we respectfully ask that this Application is approved.

Confirmation that submitted drawings have been checked for accuracy

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Signed:		Date:	16 th February 2026
Position:	Surveyor	(on behalf of Cornerstone)	

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