

SUPPLEMENTARY INFORMATION

There is a telecommunications site located at Wealden House, Lewes Road, which hosts a number of mobile network operators. A Notice to Quit (NTQ) was served on the operators so that the equipment could be removed to allow for redevelopment of Wealden House and its surrounds to take place (LPA reference DM/22/2832). Vodafone removed their equipment some time ago and are now in urgent need of a replacement site, to replace the coverage that was lost.

The Code of Practice acknowledges the requirement to install replacement sites where NTQs are being proposed:

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

The applicant has spent a considerable amount of time searching in this area for a location for a replacement site that works from a technical perspective, whilst also minimising the visual impact of the proposal for surrounding businesses and residents. This has been particularly important in this case given the whole of the search area for the replacement site is located within the High Weald Area of Outstanding Natural Beauty.

A location at the application site has now been identified. It is considered that this location presents the best option from both a technical and visual impact perspective.

1. Site Details

Site Name:	Beeches Farm	Site Address:	Land at Beeches Farm, Beeches Lane, Ashurst Wood, East Grinstead, Sussex, RH19 3RN
National Grid Reference:	E: 541987 N: 137191		
Site Ref Number:	CS_306650_00	Site Type: ¹	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)

¹ Macro or Micro

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

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

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Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	
If no explain why: N/A		
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:	Yes
Date of pre-application contact:	03/07/2024
Name of contact:	N/A
Summary of outcome/Main issues raised: On the 3 rd July 2024, a pre-application consultation letter and drawings of the proposal were sent to The Chief Planning Officer at Mid Sussex Council for comment. 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:	
Summary issues raised: Cornerstone's commercial relationship with Vodafone has changed, effectively increasing their independence to work with other companies in the deployment of mobile infrastructure. It means Cornerstone no longer have visibility of Vodafone's full update plan. However, Cornerstone is fully committed to working closely with Local Planning Authorities and following best practice guidance. Cornerstone aim to engage and work with the planning department at the earliest opportunity from when they are 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. Cornerstone recognise the importance of developing long term partnerships and will always work with you to deliver improved mobile connectivity.	

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Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline of consultation carried out: Pre-application consultation was carried out with the local ward councillor for the Ashurst Wood & East Grinstead Ward (Councillor John Belsey), Ashurst Wood Village Council, and High Weald AONB (National Landscape) Unit. Pre-application consultation letters and drawings of the proposals were sent to these parties on 3rd July 2024.			
Summary of outcome/main issues raised (include copies of relevant correspondence): The Village Council responded on 16th July 2024 to request an escorted site visit. Contact details for the landowner's land agent were provided in order for the Village Council to arrange this, and we invited any queries or questions raised following the visit to be sent to us. No queries or questions were received.			

School/College

Location of site in relation to school/college (include name of school/college): None nearby in line with Code of Practice.
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/Aerodrome Operator consultation (only required for an application for prior approval)

Will the proposed development be on a civil safeguarding area or a defence safeguarding area?	Yes	
Has the Civil Aviation Authority/Secretary of State for Defence/operator of the civil safeguarding area or defence safeguarding area been notified?	Yes	

Details of response:

An aerodrome notice was emailed to London Gatwick Airport on 28th October 2024. A copy of the notice and proof of delivery is enclosed. No response has been received at the time of submitting the application. If any responses are received these will be forwarded to the Local Planning Authority.

Developer’s Notice

Copy of Developer's Notice enclosed?	Yes
Date served:	17/12/2024
A developer's notice and copy of the proposal drawings were posted by Special Delivery to the landowner on 17/12/2024. Copy of developer's notice and proof of delivery enclosed.	

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3. Proposed Development

The proposed site:

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 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

Background

As part of Vodafone's continued network improvement program, there is an urgent requirement for a radio base station installation at this location to replace coverage that was lost following the removal of the operator's equipment on the mast at Wealden House.

Cornerstone is limited in siting options as there is a requirement to provide equivalent replacement coverage and capacity for this area of Ashurst Wood. The replacement of an existing site means that the operator has to be located as close as possible to the existing installation in order to fit in with the surrounding network and to maintain the provision of equivalent coverage and capacity to the surrounding local area.

In addition to replacing the coverage which has been lost, the operator is also taking the opportunity to install a site which is capable of hosting the latest 5G services, ensuring that residents and businesses within the area have access to the most up to date, high quality and reliable technology.

The Site

The application site is located on private agricultural land at Beeches Farm, within a copse of trees measuring 20 metres in height. The surrounding area is predominantly agricultural and there are a number of belts of mature trees on the surrounding land which will provide screening of the proposed equipment. Beyond the fields to the east, south and south west of the application site is the village of Ashurst Wood, which is predominantly residential in nature.

The site is located within the High Weald Area of Outstanding Natural Beauty. The nearest listed building is Homestall Manor which is located approx. 330 metres to the north east of the application site.

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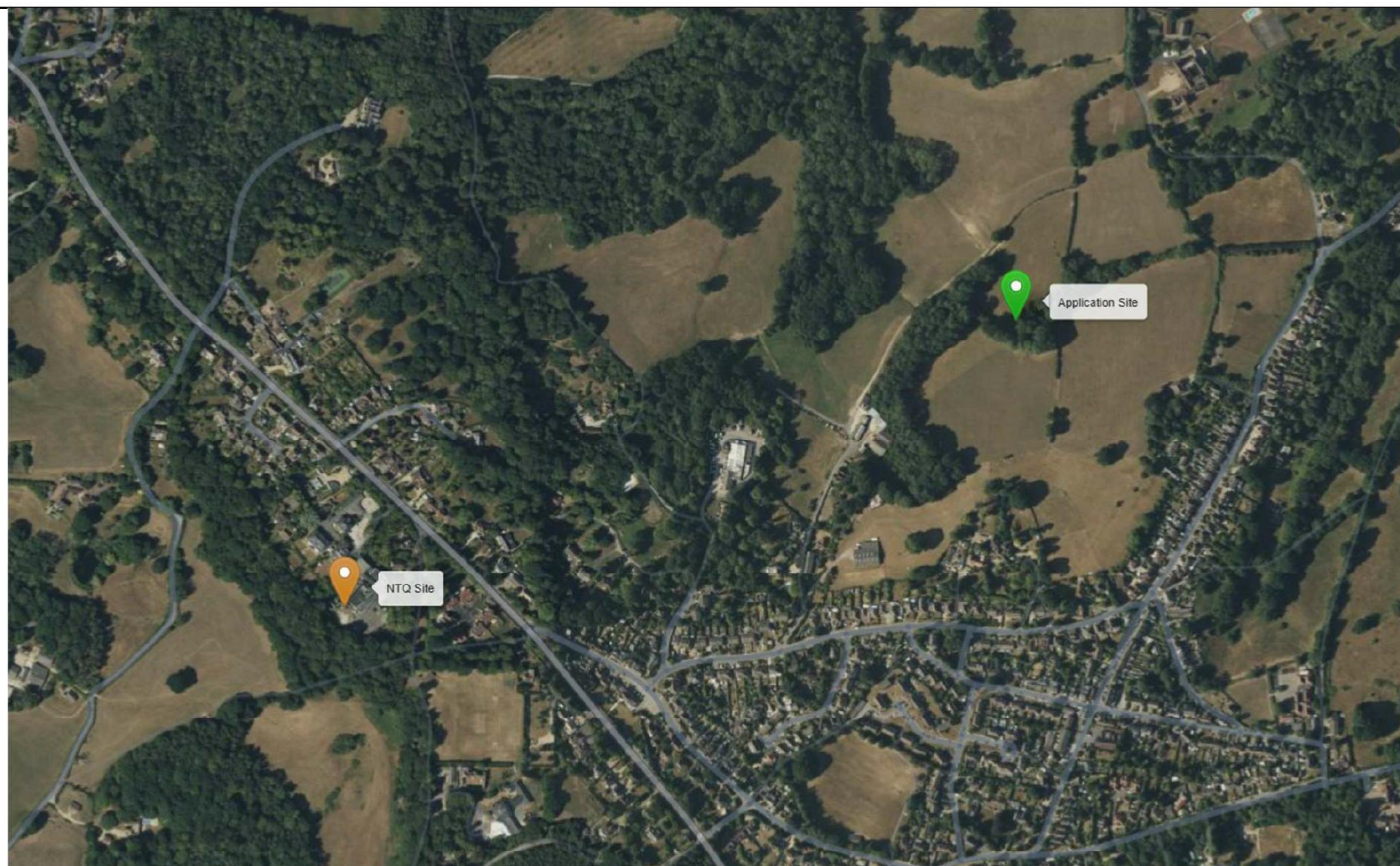


Image 1a: Aerial view of the proposed application site and the NTQ site (Source: Grid Reference Finder)



Image 1b: The application site

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

The operator is seeking to provide replacement 2G/4G services as well as new 5G coverage and capacity to the surrounding area for Vodafone, to ensure high quality customer experience is obtained as demands on the network increase and technologies change.

The 4G provision allows internet access, video calling, data downstreaming, accessing social media networks and emailing to name just a few of the benefits. Therefore, to maintain high quality indoor 4G services into this area would promote activity in line with the general population demand as the ownership of smart devices increases. New 5G service provision will bring faster, more responsive and reliable connections than ever before.

Type of Structure (e.g. tower, mast, etc): Swann CS1S Lattice Tower

Description:

The installation of a 25 metre high slimline lattice tower with 6 no. antennas and 2 no. transmission dishes, 3 no. equipment cabinets, 1 no. electric meter cabinet, and ancillary development thereto including compound fencing.

Overall Height: 25.0m Metres

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

Equipment Housing: 1 x PSC Cabinet

Length: 0.66 Metres

Width: 0.80 Metres

Height: 1.77 Metres

Equipment Housing: 2 x Hybrid Racks

Length: 0.62 Metres

Width: 0.60 Metres

Height: 1.77 Metres

Equipment Housing: 1 x GFMC1403P Electric Meter Cabinet

Length: 0.47 Metres

Width: 1.010 Metres

Height: 0.997 Metres

Materials (as applicable):

Tower/mast etc – type of material and external colour: Steel – Galvanised (Grey)

Equipment housing – type of material and external colour: Steel - Grey

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

In keeping with the National Planning Policy Framework (NPPF) guidelines of using “high quality communications infrastructure”, the proposed design has been selected to minimise visual impact upon the surrounding environment.

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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.

In terms of setting, a location has been found that is set back well away from the surrounding public highways, on private land, within a copse of mature trees measuring 20 metres in height. The Code of Practice provides guidance in relation to the siting of telecommunications equipment and states:

"39. 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... 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 tree-line and the trees may need to be maintained to prevent growth above a certain level."

This is the case in this instance, whereby the proposed mast needs to be at a height of 25 metres in order for the proposed antennas and transmission dishes to achieve a clear line of sight over the nearby trees to provide the required levels of coverage to the surrounding area, and to prevent any excessive tree lopping being required. An Arboricultural Impact Assessment and Tree Plan will be submitted to the Local Planning Authority in due course.

Due to the proposed height of 25 metres and the open surrounding landscape, it was considered that a slimline lattice tower would be the most suitable structure. The lightweight thin struts of the lattice tower allow light to pass through them, as opposed to an oblique structure such as a monopole. The proposed antennas and dishes are fitted tight to the tower which was considered to be a preferable design choice over a wider, more bulky headframe which would have been required should a monopole structure have been proposed.

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Image 2: Example of monopole with headframe (Source: FLI)

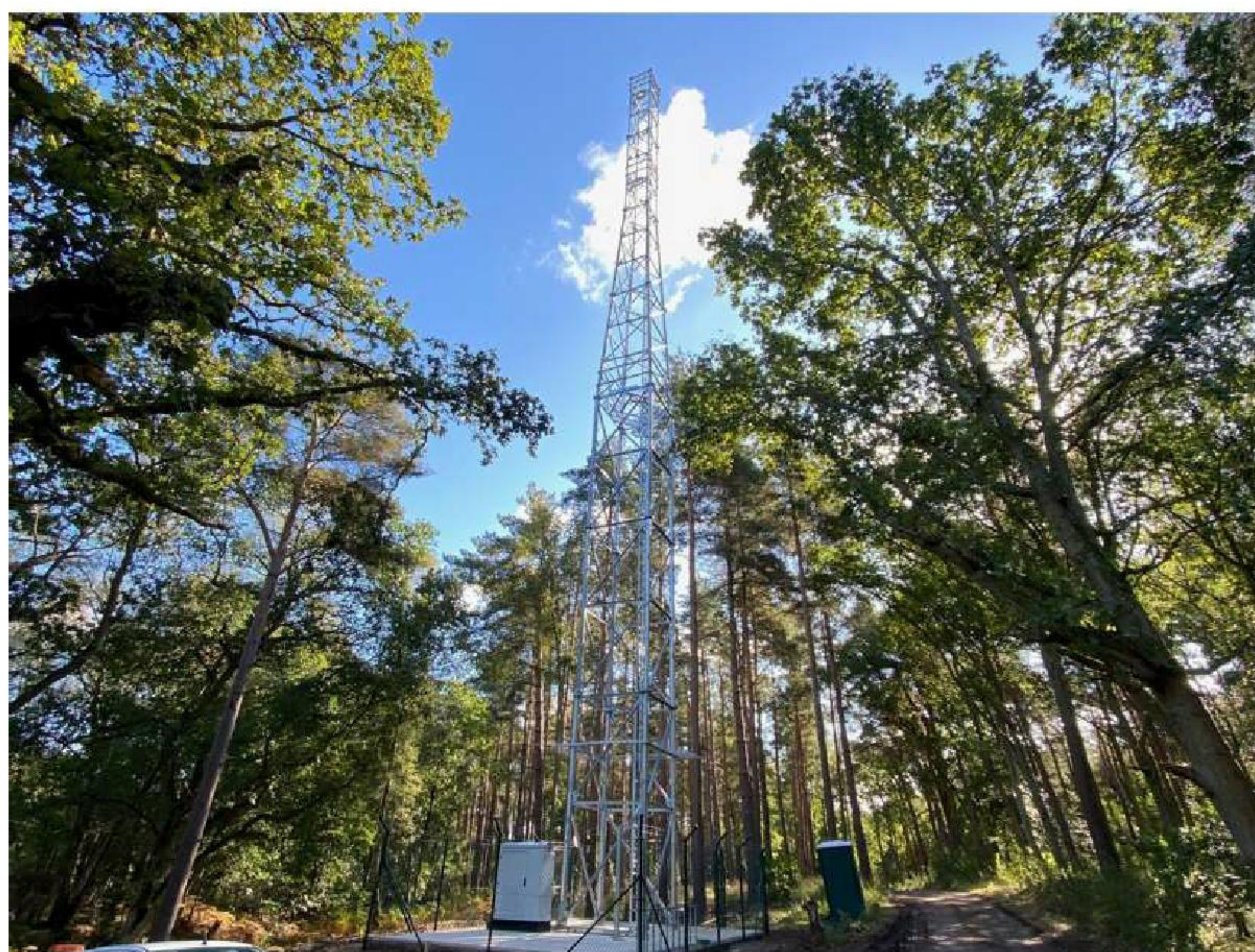


Figure 3: Example of a slimline lattice tower structure in build (the antennas and associated equipment on the tower have yet to be installed)

The proposed transmission dishes will be located at a height of 21 metres AGL on the proposed tower. They require a clear line of sight with other dishes in the operators' network in order to transmit effectively. This also guided the overall height of the tower.

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The proposed tower and equipment cabinets will be located within a fenced compound. The palisade fencing will provide screening for the ground based equipment cabinets and the lower part of the tower. The existing foliage and trees will also provide screening to aid in preventing the compound and equipment cabinets from being visible from public vantage points in the wider surrounds.

The operator has therefore carefully considered the design of the proposed column. The operator is proposing the most sensitive design currently available to them which will provide the necessary replacement coverage and capacity to the surrounding area, as well as the new 5G services.

The mast will be coloured light grey to blend in with often grey skies, minimising the impact upon the landscape. The cabinetry will be coloured grey. However, both the mast and cabinetry can be coloured any other colour the Local Planning Authority consider appropriate if necessary.

The proposed installation will ensure replacement and new mobile telecommunications service within this locale, meeting the expectation of residents, businesses and visitors to use their handheld devices seamlessly wherever they are, whilst also minimising the visual impact of the infrastructure on the surrounding environment and meeting all ICNIRP certification requirements.

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Technical Information

Health and Safety - including ICNIRP compliance
An ICNIRP certificate is provided as part of this application.

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, Vodafone 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 Vodafone'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 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	Yes	
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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

A mobile phone transmitter is designed to cover a specific area and links its coverage to the next site in the network, creating a patchwork of overlapping coverage 'cells' across the country. So, if a person is on the move, the network will transfer their calls from one site to the next. 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. There is a specific requirement for a replacement radio base station at this location to allow Vodafone to provide replacement 2G/4G services in and around this area of Ashurst Wood whilst also providing the latest new 5G service provision to the local area. This ensures high quality indoor service provision is maintained. As explained earlier, this requirement stems from the removal of the operator's equipment from the existing mast at Wealden House, which was required to allow for the redevelopment of Wealden House and its surroundings to take place. Mobile connectivity and service is required where customers live, work and play. 5G coverage and superfast mobile broadband data capacity demand will continue to increase exponentially with the introduction of IoT (Internet of Things), machine to machine connectivity, automated transport/industry and other 'smart' applications. To this end, the existing shared infrastructure within the built environment has had to be reviewed and adapted as appropriate. Coverage plots are provided as part of the application's supporting documentation and snips can also be found below. The following image shows the existing 4G coverage situation for Vodafone in the area. As can be seen, following the removal of the equipment at

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Wealden House, there is now a coverage 'not-spot' – ie. a hole in the coverage provided – in this area of Ashurst Wood (the area with no colour overlaid). Coverage in the surrounding area is also poor – yellow represents outdoor coverage only, and green is in car/rural coverage. There is currently no indoor coverage available in a wide section of this area (purple – indoor dense urban, orange – indoor urban and red – indoor suburban). As a result, Vodafone customers in the area with no colour overlay will not be able to access any mobile internet at all. Those in the yellow area will only be able to achieve coverage outdoors, and those in the green area will get in-car coverage but mobile internet speeds will be slow.

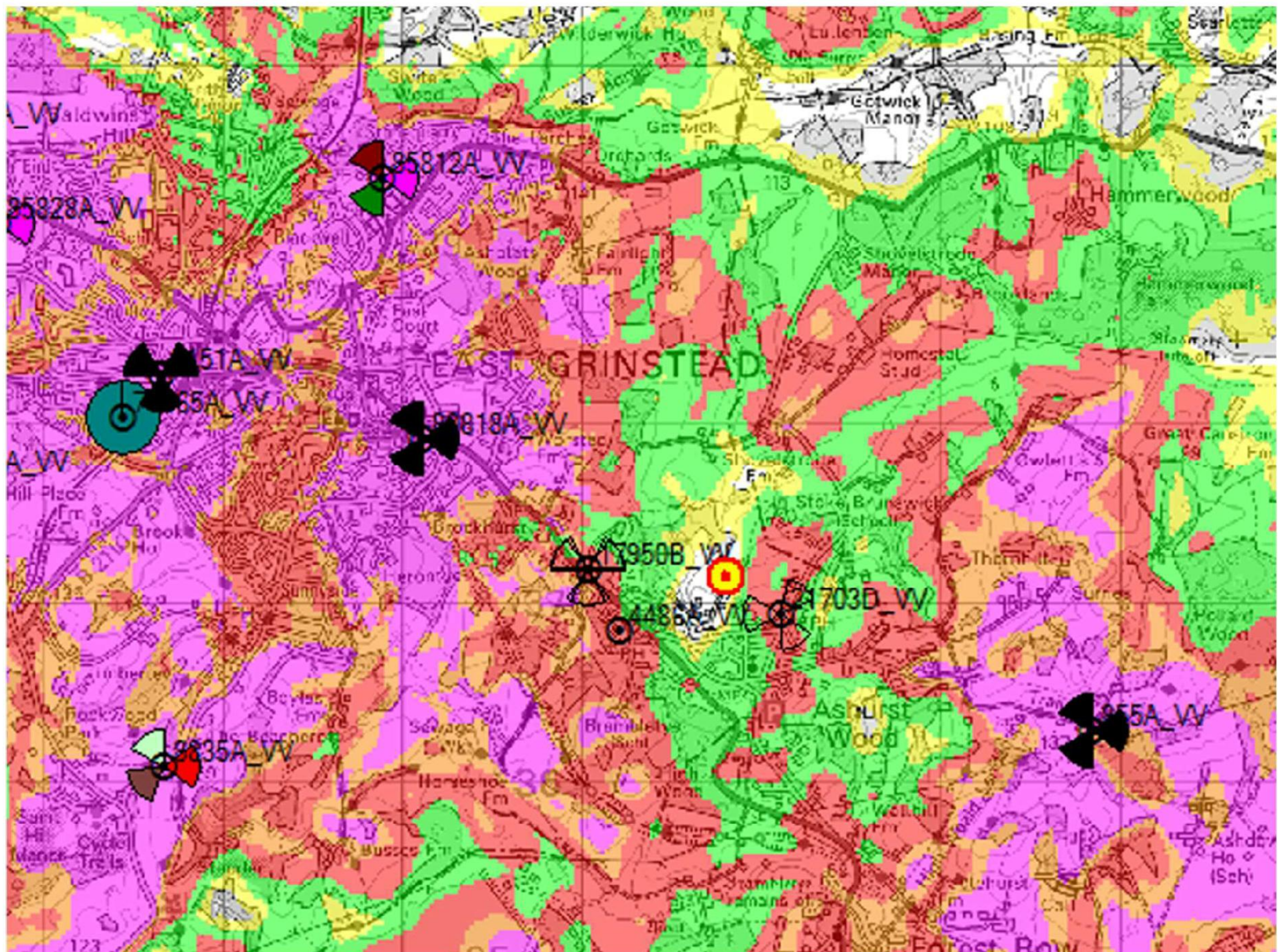


Image 4a: Existing Coverage Plots

The image below demonstrates the proposed coverage once the application site is installed. As can be seen, the not-spot area is no longer present. The quality of coverage is drastically improved, with the majority of the target coverage area covered by purple – indoor dense urban, orange – indoor urban and red – indoor suburban coverage. There is also an increase in surrounding areas, particularly to the north east.

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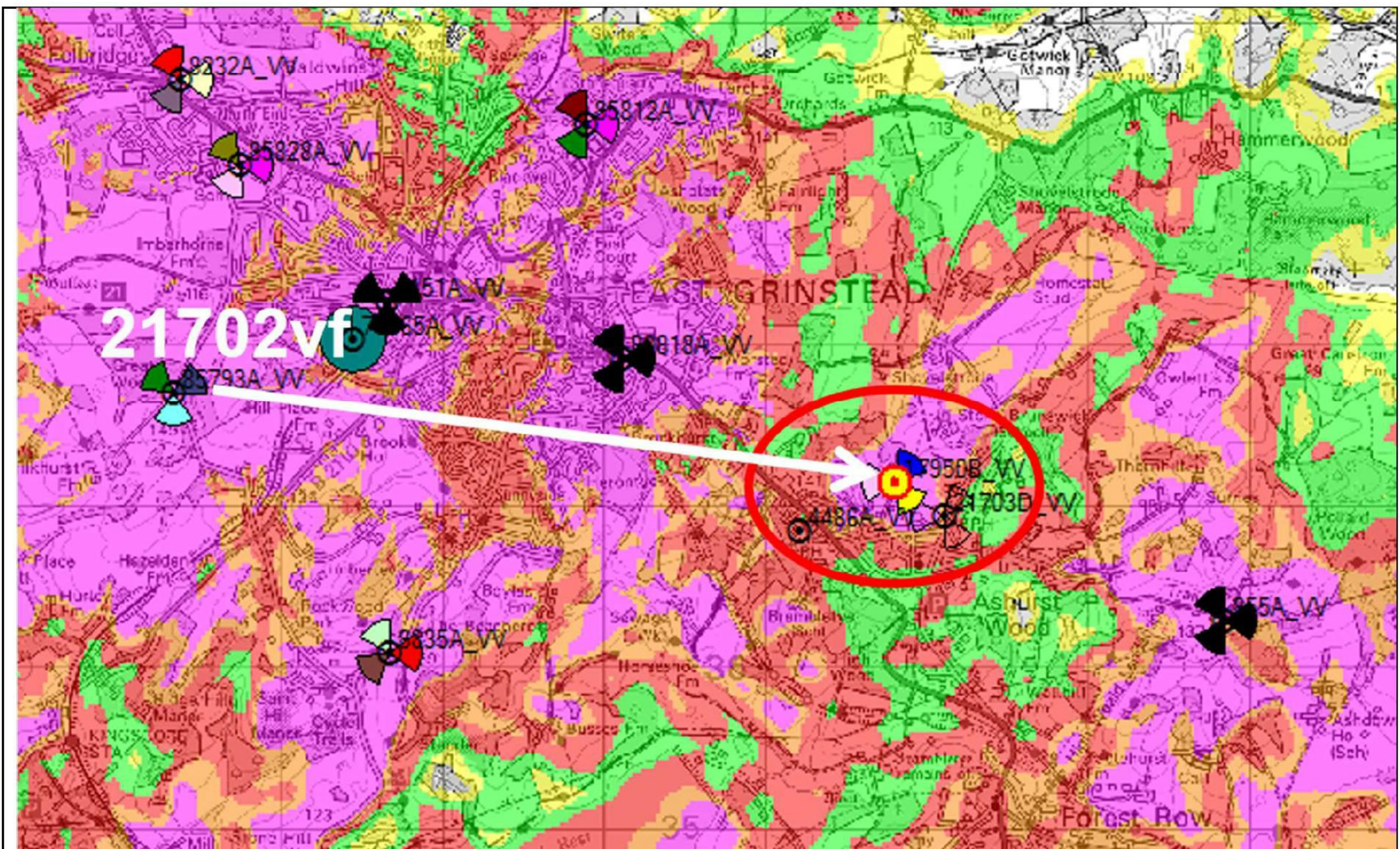


Image 4b: Proposed Coverage Plots

It is critical to understand that the UK's four Mobile Network Operators (MNOs), including Vodafone, all utilise different technology spectrums to provide their mobile service. The spectrums the Operators utilise are allocated by Ofcom, as industry regulators on behalf of UK Government, through licence agreements with each of the individual MNOs. As such, each MNO must utilise the spectrum licenced to them. Each part of the RF spectrum has variations in terms of RF propagation. Therefore, the four individual MNO networks, and their sharing arrangements, cannot be compared directly and there will be variations in how all four networks are deployed and developed. For this reason, all MNOs, including Vodafone, who continue to be competitors but share base stations where possible, have a completely different network configuration they need to fit within and build 5G service around. Therefore, the network has to be built differently, with different antennas and equipment, to take account of those spectrum and licence variations and this will lead to necessary infrastructure variations cell to cell, depending on site specific demand, local constraints and requirement. As such, the various networks will have variations in how their infrastructure is deployed and developed.

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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 for Wireless Network Development in England' the applicant's network rollout team 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;
- 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 replacement radio base station in this location to provide replacement 4G coverage/capacity and new 5G service provision.

As demonstrated in Image 5, the search area for the site is wholly located within the High Weald Area of Outstanding Natural Beauty, and therefore it was not possible to locate the proposed site outside of the AONB as this would not meet the operator's technical requirements for replacing the coverage that has been lost.

Care has been taken to identify a proposed location as far away from residential properties as possible in order to minimise any potential visual impact on local residents.

The vast majority of buildings within the search area are traditional 2-storey residential properties which are not tall enough to host the proposed telecommunications equipment, nor are they of a suitable construction due to their pitched roofs.

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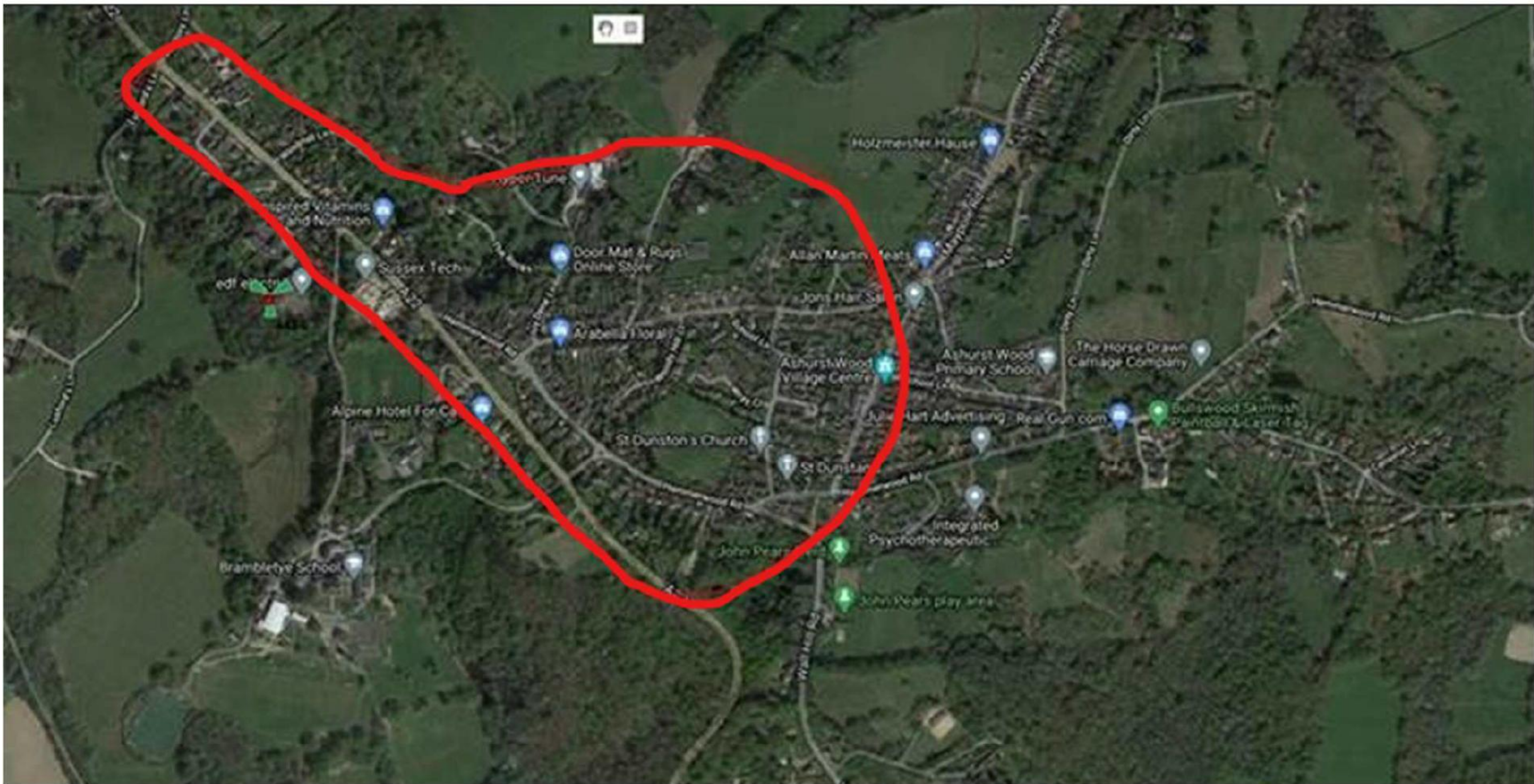


Image 5: Search area for replacement site outlined in red

Site Type	Site Address	National Grid Reference	Reason for not choosing site
Existing Telecoms Site – NTQ (D1)	4486, Wealden House, Lewes Road, Ashurst Wood, West Sussex, RH19 3TT	E: 541220 N: 136850	This is the NTQ site where the operator previously hosted their equipment from. However, they removed their equipment following an NTQ being served on them to allow for the redevelopment of Wealden House and its surrounds (LPA reference DM/22/2832). As such, the mast at Wealden House is no longer available and a replacement site is required.
Existing Telecoms Site – (D2)	MBNL MSX121, Grass Verge on Lewes Road, close to junction of Hammerwood Road, Ashurst Wood, RH19 3TJ	E: 541465 N: 136794	This existing site is operated by MBNL for and on behalf of H3G/EE. It is a slimline replica telegraph pole structure with shrouded antennas. In order for the structure to be capable of hosting Vodafone in addition to the existing operators, it would need to be upgraded to a taller, more substantial structure in order to carry the weight and size of the additional antennas and transmission dishes. It was not considered that a lattice style structure or monopole with an open headframe (such as that demonstrated in Image 2) would be

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			suitable in this location, on a grass verge adjacent to the public highway and close to residential properties. The headframe would need to be open in order for the proposed 5G antennas to transmit effectively, as they are not able to transmit through Glass Reinforced Plastic (GRP) which is what the shroud at the top of the existing site is made of. There is also not enough space on the grass verge for an installation of this nature, which would require a concrete base and compound fencing. As such, this option was discounted in favour of the application site, which is located as far away as possible from the public highway and nearby residential properties.
Rooftop (D3)	St Dunstan's Church, 2 Chapel Lane, Ashurst Wood, RH19 3QT	E: 541952 N: 136587	The church roof is of a steep pitched construction and there is no design available to support the operators' equipment on this type of roof. The louvres within the tower are too low to allow antennas located behind them to provide the required levels of coverage to the target coverage area. As such, this option was discounted.
Rooftop (D4)	Ashurst Wood Village Centre & Council Offices, 20-22 Maypole Road, Ashurst Wood, RH19 3QN	E: 542100 N: 136760	The Village Centre roof is of a pitched construction and there is no design available to support the operators' equipment on this type of roof. In addition, the rooftop is too low to host an installation capable of providing the required level of coverage to the target coverage area. As such, this option was discounted.
Rooftop (D5)	Small Shopping Parade, 28-30 Maypole Road, Ashurst Wood, RH19 3QY	E: 542105 N: 136760	The buildings are in mixed use with retail on the ground floor and residential on the upper floors. The roofs are of a pitched construction and there is no design available to support the operators' equipment on this type of roof. In addition, the rooftops are too low to host an installation capable of providing the required level of coverage to the target coverage area. As such, this option was discounted.
Rooftop (D6)	Rooftop at The Three Crowns	E: 541546 N: 136744	The public house roof is of a pitched construction and there is no design available to

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	PH, 10 Hammerwood Road, Ashurst Wood, RH19 3TJ		support the operators' equipment on this type of roof. In addition, the rooftop is too low to host an installation capable of providing the required level of coverage to the target coverage area. As such, this option was discounted.
Rooftop (D7)	Rooftop at Ashurst Wood MOT Centre, 2 Ivy Dene Lane, Ashurst Wood, RH19 3TN	E: 541664 N: 137007	The MOT centre roof is of a lightweight construction which is not structurally capable of hosting the weight of the telecommunications equipment. In addition, the rooftop is too low to host an installation capable of providing the required level of coverage to the target coverage area. As such, this option was discounted.
Greenfield (D8)	Luxfords Farm, Luxfords Lane, Ashurst Wood, RH19 3PA	E: 541135 N: 136783	This option is located outside of the search area. An installation in this location would be on low ground and would not deliver the required level of coverage to the target coverage area. As such, this option was discounted.
Greenfield (D9)	Ashurst Wood Recreation Ground, Wray Close, Ashurst Wood, RH19 3QX	E: 541812 N: 136668	This option is at a recreation ground. The development of an installation in this area would be restricted due to physical access constraints as there is no established vehicular access point that would be wide enough for the HGVs and cranes that would be required for the build of the site. In addition, this option is directly overlooked from several directions by residential properties. It was not considered that this option would be the least harmful to the AONB/residential amenity. As such, it was discounted.
Greenfield (D10)	Land off Park Lane, Lewes Road, Ashurst Wood, RH19 3TF	E: 541644 N: 136565	A mast at this location would not provide the required level of coverage to the target area due to the substantial tree cover that would inhibit the signal. This option has therefore been discounted.
Greenfield (D11)	Land at St Dunstan's Church, 2 Chapel Lane,	E: 541974 N: 136579	This land is used for car parking for the church, and is often at capacity. In addition, it is directly overlooked by residential properties with no screening. As such, this option was discounted as it could impact on the operational use of the

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	Ashurst Wood, RH19 3QT		church by reducing parking facilities, as well as because it was not considered to be the least harmful option when taking into account the visual amenity of nearby residents.
Greenfield (D12)	Land at Industrial Area, Ivy Dene Lane, Ashurst Wood, RH19 3RN	E: 541641 N: 136966	This option was discounted as there would be physical access issues for the HGVs/crane required for building the site. The overhanging trees on Ivy Dene Lane would cause an issue for tall vehicles and would present a risk of tree strikes which would likely damage the trees and could also damage the proposed equipment.
Greenfield (D13)	Land at The Three Crowns PH, Hammerwood Road, Ashurst Wood, RH19 3TH	E: 541562 N: 136734	This land is open with no screening, directly adjacent to the public highway and overlooked by residential properties. It was not considered that an installation here would be the least harmful option to the AONB and to the outlook of residential occupiers, and as such it was discounted in favour of the application site.
Greenfield (D14)	Land at Beeches Farm, Beeches Lane, Ashurst Wood, RH19 3RN	E: 541811 N: 137136	This option was a feasible option for the proposed equipment and a scheme was drawn up here. However, the equipment was subsequently relocated to the application site as the landowner requested that the equipment was located further from the farmhouse in order to minimise the visual impact.
Greenfield (D15)	Land at Oaklands Place, Beeches Lane, Ashurst Wood, RH19 3RN	E: 541767 N: 137043	This option is overlooked by residential properties and has little screening. As such, it was not considered that an installation here would be the least harmful option to the AONB and to the outlook of nearby residential occupiers, and it was discounted in favour of the application site as such.
Greenfield (D16)	Farmland at Woods Hill Lane, Ashurst Wood, RH19 3RQ	E: 541866 N: 136968	This option is overlooked by residential properties and has little screening. As such, it was not considered that an installation here would be the least harmful option to the AONB and to the outlook of nearby residential occupiers, and it was discounted in favour of

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			the application site as such.
Greenfield (D17)	Land at Russetts, Woods Hill Lane, Ashurst Wood, RH19 3RF	E: 542034 N: 136925	This option is overlooked by residential properties and has little screening. As such, it was not considered that an installation here would be the least harmful option to the AONB and to the outlook of nearby residential occupiers, and it was discounted in favour of the application site as such.
Greenfield (D18)	Ashurst Wood Village Centre Car Park, 20-22 Maypole Road, Ashurst Wood, RH19 3QN	E: 542094 N: 136723	This land is used for car parking for the Village Centre/Council Offices, and space is restricted. In addition, it is directly overlooked by residential properties with no screening. As such, this option was discounted as it could impact on the operational use of the Village Centre/Council Offices by reducing parking facilities, as well as because it was not considered to be the least harmful option when taking into account the visual amenity of residents.
Greenfield (D19)	Land at Brambletye School, Brambletye Gate, Lewes Road, Ashurst Wood, RH19 3TA	E: 541323 N: 136902	An installation in this location would require the removal of trees in order to gain access to build the site and to maintain it in the future. It would also require tree lopping in order for the antennas to see over the tall mature trees. This option is much closer to residential properties who directly overlook the location. As such, it was not considered to be the least harmful option and was discounted as such.
Streetworks (D20)	Grass Verge off A22, Lewes Road, Ashurst Wood, RH19 3SS	E: 541032 N: 137176	Installations in this location have previously failed to obtain planning permission (LPA references DM/21/1006 and DM/22/2144). As the siting of equipment in this location has previously been found to be unacceptable by the LPA, this option was discounted.
Streetworks	Footpaths throughout the search area, Ashurst Wood	Various	Streetworks installations were discounted following the identification of a Greenfield site that was considered to be acceptable. An installation on the footways throughout the area would likely be directly overlooked by residential properties due to the dense residential nature of the search area.

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Image 6: Map of discounted sites (red pins) and application site (green pin) (Source: Grid Reference Finder)

[https://gridreferencefinder.com?gr=TQ4198737191|Application s Site|2,TQ4122036850|Existing s NTQ s Site s \(D1\)|1,TQ4146536794|D2|1,TQ4195236587|D3|1,TQ4210036710|D4|1,TQ4210536760|D5|1,TQ4113536783|D8|1,TQ4181236668|D9|1,TQ4164436565|D10|1,TQ4154636744|D6|1,TQ4166437007|D7|1,TQ4197436579|D11|1,TQ4164136966|D12|1,TQ4156236734|D13|1,TQ4181137136|D14|1,TQ4176737043|D15|1,TQ4186636968|D16|1,TQ4203436925|D17|1,TQ4209436723|D18|1,TQ4132336902|D19|1,TQ4103237176|D20|1&v=r&labels=1](https://gridreferencefinder.com?gr=TQ4198737191|Application%20s%20Site|2,TQ4122036850|Existing%20s%20NTQ%20s%20Site%20s%20(D1)|1,TQ4146536794|D2|1,TQ4195236587|D3|1,TQ4210036710|D4|1,TQ4210536760|D5|1,TQ4113536783|D8|1,TQ4181236668|D9|1,TQ4164436565|D10|1,TQ4154636744|D6|1,TQ4166437007|D7|1,TQ4197436579|D11|1,TQ4164136966|D12|1,TQ4156236734|D13|1,TQ4181137136|D14|1,TQ4176737043|D15|1,TQ4186636968|D16|1,TQ4203436925|D17|1,TQ4209436723|D18|1,TQ4132336902|D19|1,TQ4103237176|D20|1&v=r&labels=1)

If no alternative site options have been investigated, please explain why:
N/A
Land use planning designations:
The site is located within the High Weald Area of Outstanding Natural Beauty.

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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.

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. It was most recently updated again in December 2023, in relation to a number of themes including; flexibility for planning authorities in local housing need, clarification of Green Belt boundary alterations and acceptable brownfield development within the Green Belt. It strengthens the importance of building 'beautifully' and respecting the character of an area. It removes the need for annual five-year land supply updates, and protects neighbourhood plans from speculative development for five years. Also, the update encourages community-led and self-build developments and further protects agricultural land in its availability for food production. In December 2024, a further update took place, reversing a number of the previous revisions from December 2023. The update does not change any parts relating specifically to telecommunications development, other than the paragraph numbers.

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 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 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.

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The NPPF supports the expansion of telecommunications:

"Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G)..." (para. 119).

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

Paragraph 123 of the NPPF retains guidance from a previous NPPF version which relates to local planning authorities 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" (emphasis added).*

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

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Section 15 relates to conserving and enhancing the natural environment. Para 189 seeks to protect National Landscapes and states that:

"Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes... The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas."

Code of Practice for Wireless Network Development in England

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 Best 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 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.

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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:

- **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

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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:

- **"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)".

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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 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;*

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- *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.
- **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*

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

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".

The statutory development plan as defined by the Planning and Compulsory Purchase Act 2004 comprises:

- Mid Sussex District Plan 2014 – 2031
- Ashurst Wood Neighbourhood Plan 2016
- The High Weald AONB Management Plan 2024 – 2029

Mid Sussex District Plan 2014 – 2031

The Mid Sussex District Plan was adopted in March 2018. It sets out a vision and a delivery strategy for the area for the period 2014 – 2031.

The vision for Mid Sussex is:

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"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 vision is underpinned by four priority themes that promote the development of sustainable communities:

*"- Protecting and enhancing the environment
- Promoting economic viability
- Ensuring cohesive and safe communities; and
- Supporting healthy lifestyles."*

The plan then sets out strategic objectives for the Plan which will help to address the priority themes. Those relevant to the proposal include:

*"3. To protect valued landscapes for their visual, historical and biodiversity qualities.
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.
7. To promote a place which is attractive to a full range of businesses, and where local enterprise thrives
8. To provide opportunities for people to live and work within their communities, reducing the need for commuting
10. To support a strong and diverse rural economy in the villages and the countryside
12. To support sustainable communities which are safe, healthy and inclusive."*

The provision of the latest high quality technologies in the area will help to achieve these objectives. For this to happen, the replacement infrastructure needs to be in place.

Policy DP16 relates to High Weald Area of Outstanding Natural Beauty and states:

"Development within the High Weald Area of Outstanding Natural Beauty (AONB), as shown on the Policies Maps, will only be permitted where it conserves or enhances natural beauty and has regard to the High Weald AONB Management Plan, in particular;

- the identified landscape features or components of natural beauty and to their setting;*
- the traditional interaction of people with nature, and appropriate land management;*
- character and local distinctiveness, settlement pattern, sense of place and setting of the AONB; and*
- the conservation of wildlife and cultural heritage.*

Small scale proposals which support the economy and social well-being of the AONB that are compatible with the conservation and enhancement of natural beauty will be supported."

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Policy DP23 relates to Communication Infrastructure. It states:

"... 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...*
- 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;*
- 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."

Ashurst Wood Neighbourhood Plan 2016

The Ashurst Wood Neighbourhood Plan was 'made' by Mid Sussex District Council on 30 June 2016. It sets out local planning policies for the development of the village and its community for the period 2015 – 2031.

Section 5.5 refers to Highways, Transport and Communication. In relation to Broadband it states:

"Broadband internet connections are slow in the parish. This affects the ability of residents to access information and the performance of businesses that rely on broadband as a key means of communication in a rural area. High-speed broadband will help to address these issues and brings with it a range of new opportunities, such as better remote and home working. The provision of fast broadband is a key asset to attract new businesses into the Parish and improve the wellbeing of its residents. The NPPF, paragraph 42 states that advanced high quality communications infrastructure is essential for sustainable economic growth and plays a vital role in enhancing the provision of local community facilities and services."

Policy ASW 22 in relation to High Speed Broadband states:

"(a) Proposals which seek to provide access to a super-fast broadband network to serve the village will be supported provided that the applicant has fully explored opportunities to erect

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apparatus on existing buildings, masts or other structures and the location and design of any installations will reflect the character of the area and respect the purpose of the AONB.

(b) All new development must be designed to enable connection to high quality communications infrastructure including super-fast broadband."

Policy ASW 1 – refers to Protection of the Countryside, and states that outside of the built up area, priority will be given to protecting and enhancing the countryside from inappropriate development and proposal for development will only be permitted in exceptional circumstances for essential utility infrastructure where no other feasible alternative site is available.

The plan also sets out policies that support sustainable development which includes appropriate and accessible infrastructure and facilities. It also includes policies which support the local economy, creation of jobs in order to reduce travel to other areas and encourage new business and employment opportunities to the area.

The High Weald AONB Management Plan 2024-2029

The High Weald AONB Management Plan sets out a 20 year strategy for the High Weald National Landscape, supported by a five-year implementation strategy from 2024-2029 with recommended actions to guide the activities of the partnership, partners, stakeholders and communities.

In the Ambitions for 2029 section, the Plan lists the following public body actions which are relevant to the proposal:

"Seek to retain and support rural services and amenities including bus services, village shops, pubs and Post Offices, and support investment in rural services such as improved rural broadband and digital connectivity cross rural areas and community transport initiatives."

"Ensure that installations of infrastructure and equipment for telecoms and utilities services are located and designed so as to avoid introducing urbanising features (such as security fencing, lighting etc.) into the rural landscape."

Gatwick 360° The Coast to Capital Strategic Economic Plan

The Gatwick 360° Coast to Capital Strategic Economic Plan (SEP) sets out the ambitions and actions for economic growth opportunities in East Surrey, Croydon, Mid Sussex, West Sussex and Greater Brighton. It identifies eight 'economic priorities' which will aid in promoting and improving economic growth.

Priority 7 is *"Improve digital network capability"*. This priority states that the ambitions and goals of the SEP are to *"deliver the kind of world-class digital network capability that can help deliver high productivity gains across all sectors of our economy"*. It goes on to state *"the widespread adoption of... connectivity across Brighton and then out to other key locations..."*

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will support innovation and business growth. Connectivity on this scale has the potential to change the way that businesses operate in our area...", and that the Coast to Capital will lead work to "work with mobile providers to ensure they identify 'not-spots' and to prioritise full coverage."

Relevant Government Reports relating to Telecommunications Development

Levelling Up the United Kingdom White Paper 2022

The Department for Levelling Up, Housing and Communities (DLUHC) published the 'Levelling Up the United Kingdom White Paper' on 02 February 2022. Levelling up is a moral, social and economic programme for the whole of government. The Levelling Up White Paper sets out how the Government spread opportunity more equally across the UK.

The 'Levelling Up the United Kingdom White Paper' champions that

'the United Kingdom is an unparalleled success story – a multi-cultural, multi-national, multi-ethnic state with the world's best broadcaster; a vibrantly creative arts sector; a National Health Service which guarantees care for every citizen; charities and voluntary groups which perform a million acts of kindness daily; globally renowned scientists extending the boundaries of knowledge every year; entrepreneurs developing the products and services which bring joy and jobs to so many; and millions of citizens whose kindness and compassion has been so powerfully displayed during the COVID-19 pandemic.

But not everyone shares equally in the UK's success. While talent is spread equally across our country, opportunity is not. Levelling up is a mission to challenge, and change, that unfairness. Levelling up means giving everyone the opportunity to flourish. It means people everywhere living longer and more fulfilling lives, and benefitting from sustained rises in living standards and well-being.

This requires us to end the geographical inequality which is such a striking feature of the UK. It needs to begin by improving economic dynamism and innovation to drive growth across the whole country, unleashing the power of the private sector to unlock jobs and opportunity for all. While there are world-leading and enterprising businesses and innovators right across the UK, economic growth and the higher productivity which drives it has been over-concentrated in specific areas, particularly the South East of England. A long tail of low-productivity businesses and places explain why UK productivity growth is too low compared to competitors. It is vital that we preserve and enhance the economic, academic and cultural success stories of the UK's most productive counties, towns and cities. But it is equally critical that we improve productivity, boost economic growth, encourage innovation, create good jobs, enhance educational attainment and renovate the social and cultural

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fabric of those parts of the UK that have stalled and not – so far – shared equally in our nation's success'.

The 'Levelling Up the United Kingdom White Paper' states that:

'The UK Government has made progress towards spreading opportunity around the country since 2019, alongside mitigating the worst effects of the pandemic, with: • £5bn for Project Gigabit to bring gigabit-capable broadband to 85% of the UK by 2025, and the £1bn Shared Rural Network deal with mobile operators delivering 4G coverage to 95% of the UK by the end of 2025; • five-year consolidated transport settlements amounting to £5.7bn in eight city regions outside London, £5bn of funding for buses and active travel over this Parliament; and £96bn for the Integrated Rail Plan delivering faster, more frequent and more reliable journeys across the North of England and the Midlands;

Levelling up is not about making every part of the UK the same or pitting one part of the country against another. Nor does it mean dampening down the success of more prosperous areas. Indeed, by extending opportunity across the UK we can relieve pressures on public services, housing and green fields in the South East. And levelling up can improve well-being in the South East by improving productivity in the North and Midlands. So, it is about the success of the whole country: realising the potential of every place and every person across the UK, building on their unique strengths, spreading opportunities for individuals and businesses, and celebrating every single city, town and village's culture. This will make the economy stronger, more equal and more resilient, and lengthen and improve people's lives. The economic prize from levelling up is potentially enormous. If underperforming places were levelled up towards the UK average, unlocking their potential, this could boost aggregate UK GDP by tens of billions of pounds each year. Levelling up skills, health, education and wellbeing would deliver similarly-sized benefits. Accumulated over time, those gains could easily surpass annual UK GDP. Success in levelling up is about growing the economic pie, everywhere and for everyone, not re-slicing it.

The United Kingdom's Geographical Disparities: Drivers and Potential Policy Approaches What does the economic and social geography of the United Kingdom look like? The UK has larger geographical differences than many other developed countries on multiple measures, including productivity, pay, educational attainment and health. Urban areas and coastal towns suffer disproportionately from crime, while places with particularly high levels of deprivation, such as former mining communities, outlying urban estates and seaside towns have the highest levels of community need and poor opportunities for the people who grow up there. These disparities are often larger within towns, counties or regions than between them. They are hyper-local and pockets of affluence and deprivation may exist in the same district. Indeed, many of the worst areas of deprivation are found in the UK's most successful cities. While change is possible, in some cases, these differences

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have persisted for much of the last century. And some of the UK's most successful cities – such as Birmingham, Manchester, Leeds, Glasgow and Cardiff – lag behind their international comparators when it comes to productivity and incomes. What are the current and future drivers of geographical disparities? Over the past century, many trends have combined to create the spatial patterns seen across the UK today. Globalisation, technological progress, advances in transport, logistics and power, and the shift from heavy industry to knowledge-intensive sectors, as well as the rise of foreign holidays and shift from technical training to university education, have had a large and lasting impact on the economic geography of the UK. These dynamics of the global economy have benefited the UK overall, improving productivity, increasing wealth and driving up living standards through more innovation and competition. These dynamics, however, have not had the same positive economic and social impacts across the UK. While London and much of the South East have benefited economically, former industrial centres and many coastal communities have suffered. This has left deep and lasting scars in many of these places, damaging skills, jobs, innovation, pride in place, health and wellbeing. What are the factors that will help drive levelling up? Levelling up requires a focused, long-term plan of action and a clear framework to identify and act upon the drivers of spatial disparity. Evidence from a range of disciplines tells us these drivers can be encapsulated in six “capitals”.

- Physical capital – infrastructure, machines and housing.
- Human capital – the skills, health and experience of the workforce.
- Intangible capital – innovation, ideas and patents.
- Financial capital – resources supporting the financing of companies.
- Social capital – the strength of communities, relationships and trust.
- Institutional capital – local leadership, capacity and capability

This White Paper sets out that the new policy regime is based on five mutually reinforcing pillars. Firstly, the UK Government is setting clear and ambitious medium-term missions to provide consistency and clarity over levelling up policy objectives. These missions will serve as an anchor for policy across government, as well as catalysing innovation and action by the private and civil society sectors. These missions are ambitions that the UK Government has for all parts of the UK. Delivering on them, while being fully respectful of the devolution settlements, will require close and collaborative work with the devolved administrations. The missions are rolling decade-long endeavours and will be reviewed periodically by the UK Government. One mission relates to:

“Digital Connectivity
Mission: By 2030, the UK will have nationwide gigabit-capable broadband and 4G coverage, with 5G coverage for the majority of the population” (my emphasis.

The White Paper notes the pivotal role that 'Digital Connectivity' has in boosting productivity, pay, jobs, and living standards by 'Growing the Private Sector'.

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To help drive these improvements, the UK Government is setting four core missions, spanning living standards; research and development (R&D); transport infrastructure; and digital connectivity.

Para. 3.2.4 of the White Paper states 'By 2030, the UK will have nationwide gigabit-capable broadband and 4G coverage, with 5G coverage for the majority of the population. This mission is focused on improving digital connectivity'.

The case for 'Digital Connectivity' action states:

'The COVID-19 pandemic demonstrated the importance of digital infrastructure right across society, from ensuring business continuity to reducing isolation. Improved digital connectivity has the potential to drive growth and productivity across the UK and widen job opportunities through remote working. However, there are significant spatial disparities in the quality of broadband and mobile networks, with rural areas likely to experience worse digital connectivity than urban areas. Infrastructure is only part of the picture: economic benefits will only materialise if businesses and workers have the skills to take advantage of improved infrastructure.'

More broadly, high quality digital infrastructure can deepen local labour markets through remote working, making it more attractive for both workers and companies to locate regionally. It also allows for the development of high-value sectoral clusters, which can drive growth and jobs in new areas. Existing specialisms in the UK regions have the potential to generate strong tech clusters, such as fintech in Scotland and Wales, e-Commerce in the North West and Northern Ireland, and Agri-Tech in Yorkshire and the Humber. The sector also provides opportunities for raising living standards – median earnings for the sector are 50% higher than the UK average.'

The policy programme for 'Digital Connectivity' states:

'In 2020, the UK Government published the National Infrastructure Strategy, committing to providing £5bn in public funding to roll out gigabit broadband to at least 85% of the country by 2025, and subsequently to as close to 100% as possible, working with the private sector. Public investment will target premises that are hardest to reach and which would otherwise not be provided for by the private sector, ensuring no areas are left behind. Gigabit coverage has increased from 10% to over 60% in less than two years. Since 2019, coverage has improved across the UK, and the UK Government anticipates the following additional improvements to be delivered as a minimum by 2025.'

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The UK Government has also agreed a £1bn deal with mobile operators to deliver the Shared Rural Network programme. This will see operators collectively increase 4G coverage to 95% by 2025. As a result of this collaboration, the vast majority of the UK will soon benefit from improvements to digital connectivity.

5G has the potential to radically change the way people live and make businesses more productive and competitive. The UK Government's ambition is for the majority of the population to have access to a 5G signal by 2027. Since 2017, the UK Government has provided £200m in funding for 5G Testbeds and Trials, supporting over 200 startups and SMEs across a range of sectors – including healthcare, manufacturing, Agri-Tech and creative industries – to better understand how to use the technology to develop new solutions and services (emphasis added).

In 2022, the UK Government will publish the Wireless Infrastructure Strategy. This will review how far the private sector will go to deliver wireless infrastructure – including 5G – across the country, and determine whether there are any market failures in places that need to be addressed, and how the UK Government could tackle these.

The West Midlands 5G (WM5G) Testbed started in 2018 with the mission of testing and proving the benefits of 5G to public and private sector productivity, creating jobs and boosting growth. The UK Government has invested £21m over three years, alongside investment from local government and the private sector. By working with local authorities and Mobile Network Operators (MNOs), WM5G has accelerated 5G deployment by over six months, resulting in the West Midlands being amongst the best connected places for 5G in the UK. In addition, WM5G has delivered a number of UK firsts, including a 5G road sensor network, 5G connected ambulance and capsule endoscopy trials, and a 5G application accelerator programme called 5prinG, which has already upskilled over 400 organisations on the benefits of 5G and allowed over 60 startups to develop new 5G products and services. We must ensure that people have sufficient digital skills to reap the benefits and prosperity arising from the digital economy. In 2020, the UK Government introduced a new digital skills entitlement, giving adults with low or no digital skills in England free access to new digital skills qualifications based on employer-supported national standards. The UK Government continues to work with local leaders to develop Local Digital Skills Partnerships. These collaborative partnerships are now operating in seven regions across England, with an eighth formally launching in Hull and East Yorkshire in early March. The UK Government will work with devolved administrations to consider how best to share the insights and

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evaluation of the programme to help build digital skills capability across the UK'.

UK Wireless Infrastructure Strategy, April 2023

In April 2023, the UK Government published the 'UK Wireless Infrastructure Strategy'¹, a plan for delivering world-class digital infrastructure which the government identifies as an essential enabler for its 5 priorities of building a better, more secure, more prosperous future for the UK, including growing the economy, and creating better-paid jobs and opportunity right across the country. In her foreword, the Rt Hon Michelle Donelan MP, Secretary of State for Department for Science, Innovation and Technology, provides context for the strategy:

"5G will be the cornerstone of our digital economy. With higher capacity and lower latency, standalone 5G will drive growth in the industries of today and tomorrow, including in emerging sectors like artificial intelligence where Britain leads the world. Just take smart ports, where 5G-enabled remote operation can help us to move containers more quickly, efficiently, and safely, boosting our international competitiveness. 5G can improve our public services, too, in everything from education to social care. In transport, for example, we can use 5G to power forward progress in everything from real time travel information to augmented reality navigation and self-driving buses and taxis.... This is an incredible opportunity; widespread adoption of 5G could see £159 billion in productivity benefits by 2035".

The Future Telecoms Infrastructure Review, 2018 sets out the ambition of the Government for the UK to become a world leader in 5G technology and ensuring world class connectivity for all. This ambition was reaffirmed in the 'UK Wireless Infrastructure Strategy', published in April 2023 which states in the Executive Summary:

"The next decade will see 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".

The Foreword of the 'UK Wireless Infrastructure Strategy' by Julia Lopez MP 'Minister of State for Department for Science, Innovation and Technology' states inter-alia:

"The more our lives are conducted online, the more access to the internet becomes critical for social and economic opportunity.

This is why delivering world-class digital infrastructure to all Britons is a fundamental mission of this government - and our efforts to build it the modern equivalent in scale and ambition to the Victorians' construction of the railways. Our plan is for every corner of our country to get lightning fast connectivity, not only to give people real choices about where to live and work today but so they will not be left out of future technological revolutions because of poor infrastructure.

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It is this sense of purpose that underpins Project Gigabit, our flagship £5 billion programme to reach hard-to-reach communities across the UK with gigabit-capable broadband. It is complemented by a staggering competition now underway between commercial suppliers to supply Britons with great connectivity.

Extraordinary progress is being made on coverage. When I began my role in September 2021, gigabit coverage was just over 50%. Now, it stands at almost 75%. With £1bn of Project Gigabit's funding now available to suppliers, our contracts are not just delivering better internet but skilled jobs everywhere from Blandford to Berwick. By the end of next year, we hope to have every part of our country under contract.

Which is why the time is right to turn our sights to mobile connectivity, where the same sense of mission is needed to deliver the kind of wireless infrastructure that will transform how we live our lives and run our economy. This is not simply a matter of improving download speeds as people browse the internet on their phones or dial into work calls. It is far more transformative than that'.

The UK Wireless Strategy states that '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 UK Government in the UK Wireless Infrastructure Strategy' recognises that 'growth in the digital sector is nearly 6 times faster than across the economy as a whole.

Connected Nations UK Report 2024

The Connected Nations UK Report 2024 was published on 5th December 2024. It provides updated data on the coverage and usage of fixed broadband and mobile networks within the UK, reporting on the further development of 4G networks and progress on the rollout of 5G networks.

The report states that "the availability of mobile 5G continues to expand, with mobile network operators (MNOs) coverage ranging between 61% to 79% outside premises. However, 5G coverage where all MNOs are present outside premises remains low, at 38% for our High Confidence level. We continue to see significant differences across the UK, with 5G deployed in 42% of sites in urban areas, compared with 16% of sites in rural areas."

In relation to 4G technology, the report states:

"4G remains the primary technology for mobile users, reaching outside more than 99% of UK premises and carries 78% of total mobile traffic data. 4G coverage where it is available from at least one MNO has now reached 95% of the UK landmass (delivering early on one of the key targets for the Shared Rural Network programme), with 4G geographic coverage across

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individual MNOs in the UK rising from a range of 80-87% last year to 88-89% this year. We note the 4G geographic improvements because of the Shared Rural Network programme."

The report also touches upon the phasing out of legacy mobile networks. MNOs have begun phasing out their 3G networks, with two operators having completed the process, and have committed to shutting down their 2G networks by 2033. Over 2 million devices remain reliant on 2G/3G networks, which highlights the need for mobile providers to ensure that their sites are ready for the increased traffic to the more recent 4G/5G technologies.

Connected Nations Update: Spring 2024

The Spring 2024 update of the Connected Nations report has found that mobile coverage has remained stable for 4G, with around 93% of the UK landmass predicted to have good outdoor 4G coverage from at least one operator. This area includes nearly all the premises in the UK.

The Spring 2024 update introduces an interactive report with both the latest and historical data available. This report shows that in the Mid Sussex local authority area, 1% of the geographical area still has no 4G coverage at all, and only 85% of the geographical area has 4G services from all operators.

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Image 7a: Data for Mid Sussex geographical 4G coverage (Source: Connected Nations)

As demonstrated below, the data shows that 46% of the geographical area of Mid Sussex does not have any 5G coverage. 54% of the geographical area has 5G coverage from at least one operator. None of the geographical area (0%) has geographical 5G coverage for all operators.

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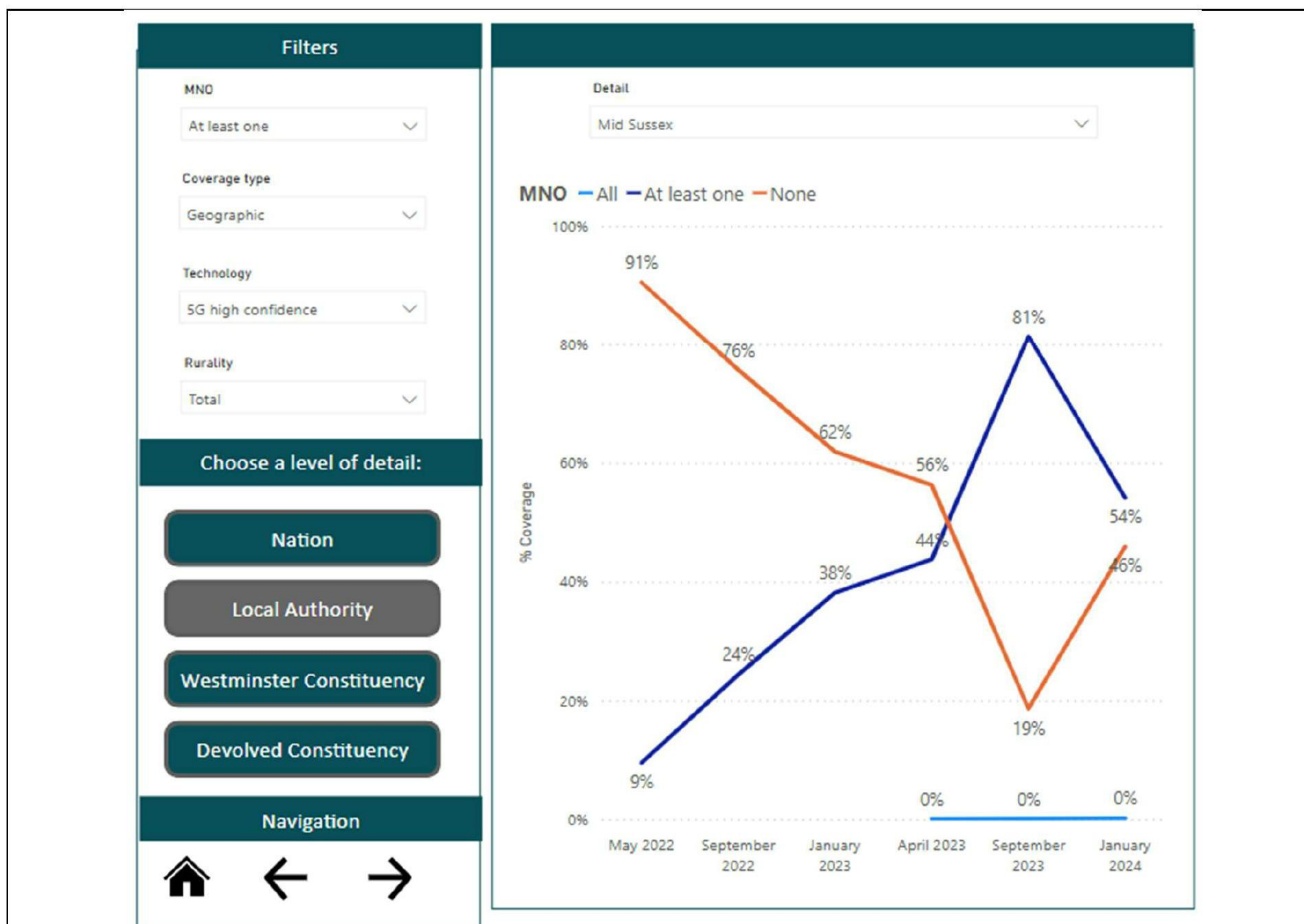


Image 7b: Data for Mid Sussex geographical 5G coverage (Source: Connected Nations)

It is therefore clear that infrastructure is needed to ensure that local residents, businesses and visitors to the Mid Sussex area have access to the 4/5G networks on their mobile devices. The proposed site will provide replacement 2G/4G and new 5G coverage for Vodafone, providing vast benefits for those living, working and visiting the area.

Online Nation 2022 Report

The 'Online Nation 2022 Report' produced by Ofcom confirms the following:

- UK adults spend almost 4 hours a day online, 3 hours of which are spent on smartphones. (UK young adults (i.e., 18-24 year olds spend approximately 5 hours online and UK adults aged 55+ spend approximately 3 hours online)
- 73% of time spent online/day by UK adults was via a smartphone
- 1 in 5 people use only a smart phone for online access compared with 1 in 10 in 2020

With regards to increased usage of smartphones only for online access the report suggests:

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"More people are using only a smartphone to go online. People were more likely in 2021 than in 2020 to only use a smartphone to go online (21% vs 11% in 2020)^[2]. There could be many reasons, but this may be because people were spending more time at home in late 2020 and early 2021 than in late 2021, and therefore used a wider range of devices. It may also reflect the larger screen size and better-optimised app functions of many smartphones, making them easier and potentially more cost-effective to use as a sole device for accessing the internet.

The Report goes on to states that:

"In September 2021 73% of the time spent online by UK online adults per day was on a smartphone. UK online adults are also spending slightly more time using tablets than computers, demonstrating that there is a clear preference for using mobile devices to go online. Those aged 25 to 34 spend the highest proportion (85%) of their online time using a smartphone, followed by 35-44s (80%); 15-24s (78%); 45-54s (74%) and those aged 55+ (55%).^[3]"

Therefore, without the improved network coverage and capacity that the proposed essential infrastructure will bring, Vodafone's network users living, working and travelling in the local area, and those of the associated MVNOs, will not benefit from reliable mobile digital connectivity when using their smartphones for business, education and personal purposes.

Planning Issues

The main issues arising from this prior approval notification are whether the proposed mast and cabinets due to their scale and siting would be a visually obtrusive feature which would be detrimental to the character and appearance of the AONB and residential amenity, 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 within NPPF, UK Wireless Digital Infrastructure Strategy, the Mid Sussex District Plan, the Ashurst Wood Neighbourhood Plan, the High Weald AONB Management Plan and the Gatwick 360° The Coast to Capital Strategic Economic Plan.

Principle of Development

The principle of development has been established by the Government when the new permitted development rights came into force in November 2016 and were subsequently amended in April 2022, which enabled sites such as this one to be built under the operators permitted development rights, with prior approval for siting and appearance being the only matters that the local planning authority can take into consideration.

^[2] Ofcom Adults' Media Literacy Tracker 2021: Core survey IN1. Which of these devices do you use to go online? (single coded)
Base: All adults aged 16+ who go online at home or elsewhere (excluding those who did not give a response at the postal survey)
– 3,577

^[3] Ipsos, Ipsos iris Online Audience Measurement Service, 1 September– 30 September 2021, adults age: 15+, UK. Note: Custom data supplied by Ipsos.

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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

There are numerous specific constraints associated with site placement in mobile network planning as touched upon above. Notably, each radio base stations can only cover a limited geographical area known as a cell and that cells are designed to overlap to form an unbroken network. The discounted options show that the area has been exhausted of options and that the proposed site is considered the best option in terms of radio and planning considerations.

Site placement is always critical in network planning and becomes even more so when one is seeking to provide replacement coverage within an established cellular pattern. There is a very specific and unique gap in the network, like a piece from a completed jigsaw would make, which needs to be filled which will enable users living, working within and passing through that area to use their mobile phones and other wireless devices. This places even greater limitations on the potential siting opportunities as many locations will not enable this specific gap to be adequately filled without compromising the existing network.

When seeking to identify a location for a replacement base station site in this instance, the applicant's Agent applied the sequential site selection process, as is advocated within the Code of Practice.

The applicant takes guidance from it in the siting and design of all their new sites and upgrades. This meant that the initial cell search investigation focused on an exploration of existing telecoms sites and then buildings and other suitably tall structures that may have been appropriate for the accommodation of the apparatus, subject to the technical constraints placed upon operators, and planning constraints imposed by the development plan. Once these had been exhausted, locations for a new base installation were explored.

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As set out above, siting considerations for a new ground-based mast include:

- Height of the site in relation to the surrounding land
- Topography of the site and vegetation
- Openness and visibility of the site
- Designated areas
- Relation to existing base stations
- Proximity to residential properties

The main instigator for a new installation at the application location follows the requirement for Cornerstone and Vodafone of progressing a replacement site in the Ashurst Wood area of Mid Sussex for a replacement radio base station capable of providing their latest 4G and new 5G technologies.

The application site is required to provide replacement coverage to support the applicant's adjacent sites and improve this area of poor mobile coverage and contribute to the Government's agenda to ensure the good quality critical infrastructure to support strong inclusive communities and contribute to economic opportunities to deliver the UK Wireless Digital Infrastructure Strategy.

4G signals by their very nature (as they carry high data rates) do not penetrate over long distances, just a few hundred metres, 5G even less so depending on the topography of the land, building clutter and vegetation including trees in the area which can reduce their effectiveness. Therefore, the new 5G radio base station needs to be close to their customer demand which in this case is the Ashurst Wood area of Mid Sussex.

The applicant has exhausted all feasible potential alternative siting options within and in reasonable proximity to the cell area. The application site remains the best available solution for a replacement installation to ensure coverage provision in this area following the removal of the operator's equipment from the existing mast at Wealden House. The comprehensive efforts undertaken during site selection and lack of any more suitable, feasible option is considered material to the assessment of the application proposals.

The siting of the proposed radio base station has been carefully considered. To this end, the equipment has been located within a mature copse of trees on agricultural land at Beeches Farm. The application site is set well away from the nearest public highways and is screened from view from residential properties by the trees, which measure approximately 20 metres in height.

The proposed equipment cabinets do not require planning permission, as they can be installed under the operator's permitted development rights. In order to remain fully transparent, they have been included on the plans and in the description. Their limited height and scale will ensure that these cabinets will not be detrimental to the visual amenity of the area.

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The proposed equipment will be located within a fenced compound. The trees and existing foliage will screen the fencing and equipment cabinets from view from surrounding public vantage points.

Furthermore, in line with the requirements of NPPF, there are no existing telecommunications installations for the operator to share, that would provide the necessary coverage to the target coverage area. Similarly, there are no buildings which are suitable and available that the operator could utilise to operate their equipment. The discounted options are set out in Section 5 above and their reasons for being discounted are fully explained.

Appearance

The design of the proposed tower has been carefully considered. As explained earlier in this statement, the slim line lattice tower is constructed of narrow struts which allow light to pass through them, which will aid in minimising the visual impact of the proposed equipment, particularly in long views. This is considered preferable to an oblique monopole with an open headframe as per Image 2.

In order to reduce the visual impact on the surrounding area the antennas are proposed to be tight to the top of the tower, rather than on a wider, more bulky head frame which would appear more prominent in the landscape.

The presence of the mature trees will ensure that the majority of the tower and the ground based equipment cabinets and fencing are screened from views from public vantage points in the surrounding 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 '*radio signals operate like light and must "see" over the target coverage area...*' The top of the tower and the transmission dishes/antennas are required to sit above the tree line for technical reasons. This is to allow them to transmit effectively. This has guided the overall height requirement of the tower, at 25 metres.

If the column and headframe were to be any lower in height, the antennas and transmission dishes would not be able to transmit effectively over the trees. It would also mean that the trees would require lopping and/or removing, reducing the level of screening. It could also result in an additional radio base station being required to cover any gaps in the proposed coverage, which would be contrary to national planning guidance.

The telecommunications mast is proposed to be a slim-line simple, vertical, functional structure. The column is relatively slender for a telecommunications installation. As a result, this installation would not appear incongruous within the streetscene in line with the requirements of the Local Plan.

The equipment cabinets are designed to appear like other statutory undertakers equipment cabinets. They are small for telecommunications equipment. The proposed equipment

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cabinets are the least amount of cabinets that can be installed in this location and enable the radio base station to operate. If the number of cabinets were to be reduced then there would not be sufficient room to house all the operators equipment. In any event, these cabinets are permitted development under the operators permitted development rights. They have only been included in the description and on the plans in order to remain fully transparent.

The design of the radio base station is one of the most sensitive designs available to the operators for this type of rural installation. This is in line with the requirements of NPPF which supports equipment which is sympathetically designed and camouflaged where appropriate [paragraph 120], The Code of Practice as well as the aspirations of the UK Wireless Digital Infrastructure Strategy, the Mid Sussex District Plan, Ashurst Wood Neighbourhood Plan and High Weald AONB Management Plan.

The applicant therefore considers that the application proposal will have a very limited impact on the amenity of the area as any views of the proposed installation are limited to glimpsed views from the surrounding public highways. The mature trees adjacent to the site ensure the proposed development will only be visible in short views within the immediate vicinity.

The proposed new site accords with NPPF because the equipment will ensure high quality communications infrastructure is maintained in the area. Placing masts within existing groups of trees and utilising simple and unfussy designs is acknowledged in the Code of Practice on Wireless Network Development in England to be less likely to dominate and be in discord with the streetscene and as a result less likely to have a detrimental impact on the visual amenity of the surrounding area.

Lack of Coverage – Material Consideration

In accordance with the NPPF, the proposed installation is significant to enable continuous replacement coverage of the telecommunication network, ensuring that this area of Ashurst Wood is able to get the mobile coverage it needs for Vodafone 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 Vodafone network. So, the proposal will not only provide replacement as well as improved and new service provision for one operator but those who buy network space off them. 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.

Trials have already begun across the UK to demonstrate the potential of 5G and how it can improve and drive productivity and efficiency. In June 2019, West Midlands 5G partnered with BT and University Hospitals Birmingham to trial the UK's first 5G Connected Ambulance.

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Real-Time communications between the paramedics and the hospital doctors enabled the effective diagnosis of the patient at an early stage of care. The trial showed how a paramedic performed a remote-controlled ultra-sound scan on a patient in an ambulance over a public 5G network. These trials show how digital connectivity and technology can reduce patient waiting times and save lives (Source: WM5G).

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 replacement radio base station, the operator's customers would continue to experience poor levels of 2G/4G coverage, causing buffering and leaving them 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 proposed installation will help improve the area's economic prosperity, strengthen the urban economy's by supporting local businesses to start, grow, adapt and diversify. It will support a better environment for today and tomorrow by reducing the need to travel and in turn minimise carbon emissions, a key ambition of the NPPF. The radio base station will support the delivery of healthcare provision and accessibility by enabling people greater access to online services, NHS appointment reminders (every missed NHS appointment costs the NHS approximately £160 source: NHS), reminders to take medicines, make appointments etc. As well as assisting hospital outpatient appointments and emergency consultations carried out remotely via video link, connected ambulances, live streaming of CCTV footage etc.

By ensuring that the 2G/4G provision that was lost is replaced, and introducing new 5G service provision into the operators' network, this would fully support the Mid Sussex District Plan, Ashurst Wood Neighbourhood Plan and High Weald AONB Management Plan aspirations to ensure that this rural area has access to high quality digital connectivity.

The Councillor's Guide to Digital Connectivity notes that a survey conducted by the Confederation of British Industry found that 81% of firms said that they see more reliable mobile connectivity as essential. Studies have also shown that mobile broadband is associated with positive impacts nationally, such as higher GDP and increased employment.

Therefore, the Government fully supports high quality communications infrastructure, even more so with the advent of 5G. Indeed, 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.

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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.

To emphasise the Government's strong support for 5G and the important role that local authorities have in supporting its roll-out, Matt Warman former Minister for Digital Infrastructure wrote a letter to all Local Authority Chief Executives, CCing all Local Authority Chief Planning Officers highlighting their role in facilitating the roll-out of next-generation infrastructure and prevent misleading claims becoming a barrier to rollout. The letter highlighted the growing importance of digital connectivity:

'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 connectivity'.

The letter goes on to state the Government ambition for 5G roll-out:

'The Government is committed to extending mobile network coverage across the UK and providing uninterrupted mobile signal on all major roads, and our ambition is for the majority of the population to have access to a 5G signal by 2027'...

The Government is also investing £200 million in a programme of 5G testbeds and trials to encourage investment in 5G so that communities and businesses can benefit from this new technology. The increased capacity, reliability and functionality offered by 5G is opening-up the potential for new innovative services for individuals and increased productivity for industry'.

The planning system plays a key role in delivering the infrastructure that we need as households and businesses become increasingly reliant on mobile connectivity. Following our consultation on the principle of reforms to permitted development rights to support 5G deployment and extend mobile coverage we recently published a technical consultation on the details of our proposed changes.

The National Planning Policy Framework ("The Framework") for England states that planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology, such as 5G.

A replacement installation in this location will ensure the lack of new 5G high quality service provision is filled and will enable Vodafone and MVNOs who buy network space off this operator to maintain access to their handheld devices wherever they are for the purposes in which they were purchased. This is fully in line with the Government's aspirations that everyone has access to the superfast communications network.

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Access to the internet in whatever medium now impacts every facet of our lives but only benefits those who can access and use it. The benefits of internet connectivity are key for both residents and businesses alike and a new radio base station in this location providing the latest 2G, 4G and 5G technologies will support the area's aspirations towards achieving sustainable prosperity, growth and increasing digital inclusion, so all people can access services.

The Code of Practice acknowledges that upgrading and improving mobile networks will not be possible without the necessary infrastructure on which we rely. With increasing consumer demand and the Government's aspirations for high quality communications infrastructure it is ever more important to improve connectivity and capacity.

The Code of Practice acknowledges that there will be times when there is a need for a new radio base station, where sites have been lost, where areas have limited or no coverage and where coverage and capacity need to be enhanced. This application is one such example where there is a need to replace the 2G and 4G provision which was lost following the removal of the operator's equipment on the existing mast at Wealden House, and provide new 5G services within this area, due to the redevelopment of the existing site.

In the Code of Practice it acknowledges *'the pressure on networks to upgrade and improve networks through changes to existing sites and the development of new sites is constant. 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 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 replacement equipment in this area.

The operator not only has a license requirement to provide a certain level of 2G/4G coverage to the population; the operator is 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 hand held devices wherever they are, whether that be indoors or outside. The proposal will provide replacement coverage for the area.

It is 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. Mobile communication plays a significant role in sustainable development, being able to access the internet via a mobile

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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.

In such instances, as described above, the NPPF supports development that improves the economic, social and environmental conditions in the area. Replacing and 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 of the Ashurst Wood area to drive economic growth and innovation, working to meet national targets of full roll-out of 5G technology for most people by 2027 will comply with the ambitions of the Government's supporting policies/guidance and the AONB Management Plan.

Mobile connectivity is essential to the future success of the economy. The combined value of 4G and 5G mobile connectivity is estimated to add £18.5bn to the economy by 2026 (Councils and Connectivity Sept 2018). Mobile connectivity is essential to creating a better society. Digital inclusion can help people gain employment, become more financially secure and improve health and well-being. Mobile connectivity is essential to fulfilling the potential of new technologies. Innovations such as artificial intelligence and connected cars will change how we work, spend our leisure time and run our public services.

The enclosed Cornerstone Local Authority Engagement Brochure September 2020, emphasises further the benefits of high quality mobile connectivity including: promoting economic growth by attracting investment from business, which creates jobs and regional prosperity in line with national and local economic strategies; helps local businesses to offer a broader range of services, boosting the local economy; helps local Councils to offer online services such as school admissions and local information for residents supports local companies by facilitating working from home, offers social benefits such as being able to connect with vulnerable family and friends (a life line during COVID 19 lockdown) or contact the emergency services 24/7, and helps local councils to offer online services such as paying council tax bills which provides a more efficient service to name but a few benefits.

There is a demand for mobile connectivity in areas where geography, logistics or economics – or a combination of all 3, make it difficult. Mobile network capacity needs to grow to meet the demand of mobile users, who are consuming ever increasing amounts of data.

Paragraph 38 of the NPPF states that:

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'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 replacement 2G/4G and new 5G coverage and capacity in this area will fully meet paragraph 38 of the NPPF.

The social and economic benefits are a significant material consideration which should be weighed against the minor amendments of the existing radio base station in this location. HM Treasury outlined such benefits in its report *'Fixing the Foundations: Creating a More Prosperous Nation'* – July 2015. Paragraph 7.1 of the plan stated that reliable and high quality fixed and mobile broadband connections support growth in productivity, efficiency and labour force participation across the whole economy. They enable new and more efficient business processes, access to new markets and support flexible working and working from home.

Paragraph 7.2 goes on to highlight strong support for high quality communications infrastructure. It states

'by reducing red tape and barriers to investment, the Government will support the market to deliver the internationally competitive fixed and mobile digital communications infrastructure the UK's businesses need to thrive and grow, and which will enable the UK to remain at the forefront of the digital economy. The Government is working with business so that the market can play the lead role in delivering against the ambitions set out in the Digital Communications Infrastructure Strategy, published March, of near universal 4G and ultrafast broadband coverage.'

Indeed, MPs have noted in parliament that the UK's Superfast Broadband connectivity was 'relatively poor' and businesses were losing out from patchy coverage.

The Government recognises that widespread coverage of mobile connectivity is essential for people and businesses. People expect to be connected where they live, work, visit and travel. That is why the Government is committed to extending mobile geographical coverage further across the UK, with continuous mobile connectivity provided to all major roads and to being a world leader in 5G. 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 prosperity at the local level and enable all places to share in the proceeds of growth.

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, the next generation

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of wireless connectivity, and for communities to benefit from the investments in the new technology.

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.

The Local Government Association (LGA) has produced a Councillor's Guide to Digital Connectivity and sets out some of the benefits of 5G technology:

- Faster mobile broadband and a more consistent experience in congested areas with a very high number of devices.
- Industrial applications, enabling businesses to improve their productivity, for example through predictive maintenance and real-time analytics.
- Internet of Things (IoT) services, many of which will help council's and businesses deliver services more efficiently including:
 - Transport and logistics: connected parcels and fleet tracking.
 - Health and social care.
 - Environmental monitoring: sensors monitoring air quality and water pollution in real-time.
 - Smart agriculture and smart animal farming, smart retailing.
 - Connected and autonomous cars: allowing cars to communicate with each other, other road users and even the road infrastructure.

On the 29th November 2024, Sir Chris Bryant MP wrote a letter to Council Leaders and Council Chief Executives across the UK in support of digital infrastructure deployment. This letter demonstrates that the Government still consider digital infrastructure to be a high priority.

The letter, entitled '*Supporting digital infrastructure deployment in your local area*' confirms the importance of fast and reliable connectivity to our everyday 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 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.

The letter points out that 'early participation from local planning authorities can speed up telecoms deployment' and urges Councils to have early and strategic discussions with mobile operators to move applications more quickly through the planning system and help improve

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mobile coverage and capacity. There is a specific ask in the MP's letter that Councils 'support the deployment of communications infrastructure wherever possible' .

The manufacturing, construction and agricultural sectors were hit particularly hard by the pandemic, and these would benefit significantly from improved connectivity. However, onerous planning rules and loopholes in existing legislation are slowing down the infrastructure upgrades needed to make the most of this mobile revolution in these much-needed industries.

The delay in gaining planning approvals for digital infrastructure is such that the Prime Minister, Sir Keir Starmer, wrote in The Times on 5th December 2024:

*"Good homes need to be supported by good infrastructure... Every road, pylon **and mast** – which connect people to opportunity – must jump through endless hoops, only to be opposed, dragged out, before eventually, if lucky, approved." [emphasis added]*

The proposed installation in this location will allow the operator to provide replacement and improved high quality 2G and 4G coverage and capacity and new 5G service provision, supporting the Government's aim of 'focusing on ensuring that everyone is connected to the information superhighway' and 'for the majority of the population to have access to a 5G signal by 2027'. This fully meets the aspirations of the NPPF.

A replacement installation in this location providing additional new 5G will ensure that the expansion of the electronic communications network is facilitated and that high quality communications infrastructure is provided to the immediate area.

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

Economic benefits

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

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

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can give the likes of engineers real-time instructions on how to fix a machine on a production line.

Social benefit

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

Sustainability and Environmental benefits

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

Health benefits

- Support the delivery of healthcare provision and accessibility by enabling people greater access to online services, NHS appointment reminders, reminders to take medicines, make appointments etc.
- Patients across the country are now becoming accustomed to using remote healthcare services such as NHS 111, virtual GP appointments, and ordering online deliveries of essential medical supplies.

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- 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high-definition images and video), increased capacity and heightened security are going to be fundamental in scaling the patient benefits of remote healthcare and keeping medical records secure and private. For instance, trials have shown that connecting ambulance crews to expert resources using 5G allows paramedics to work with doctors and conduct specialist procedures in real time whilst on the road.

Education benefits

- Facilitates access to educational establishment databases or booking systems for securing places for the likes of school dinners, field trips, extra-curricular activities, student/teacher reviews, etc.
- Provides access to school/college/university apps for setting and submitting homework/coursework, ensuring news and notifications are delivered efficiently, and for parent/student/teacher interactions.

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

Education

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.

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Summary

The proposed replacement site has been carefully sited on private agricultural land within a mature copse of trees, in order to minimise the visual impact on the AONB and surrounding residential areas.

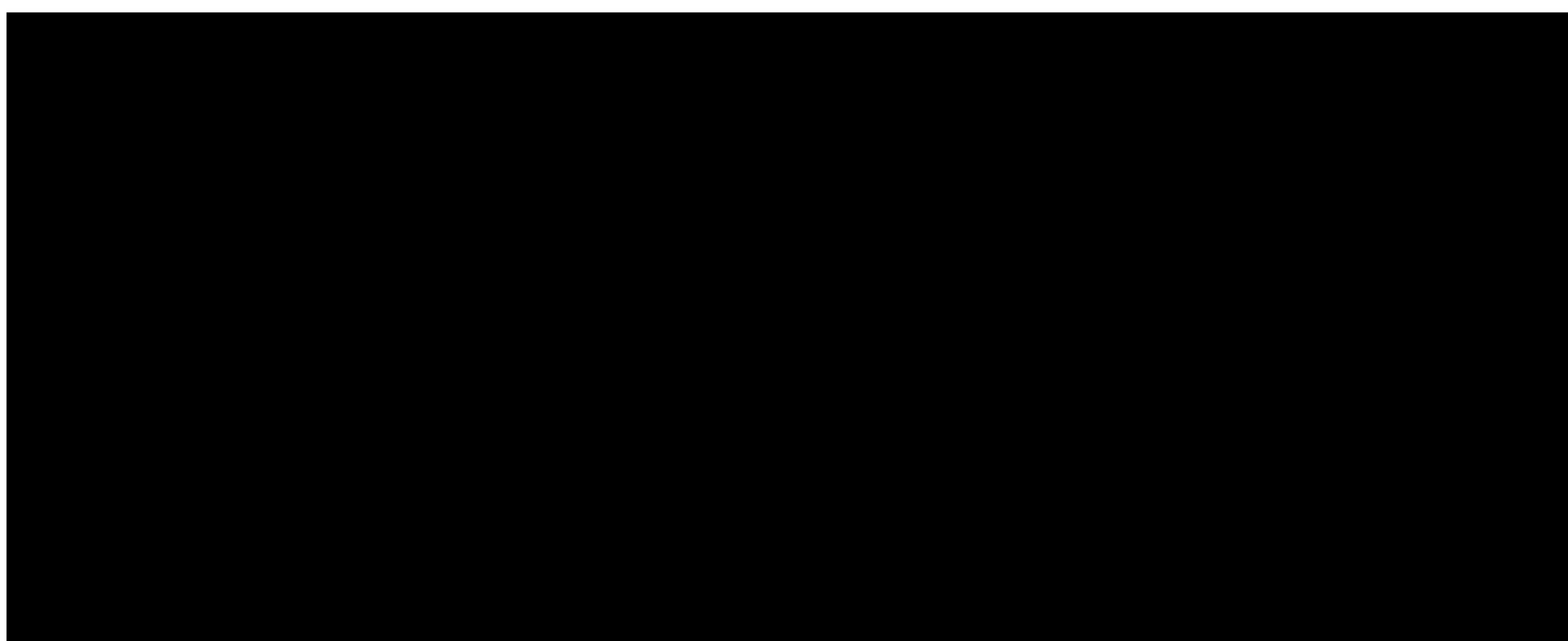
As this is a prior approval application, the Government confirms that this is permitted development, akin to outline planning permission, with just the finer details of siting and appearance to be considered by the local planning authority. The mature trees ensure the development is sufficiently screened and therefore will not have a negative impact on neighbouring residential amenity or on the wider AONB landscape.

To ensure the effective operation of the site within the network, the minimum height of tower that could be deployed at this location is the proposed 25 metre high installation.

Site selection was progressed in accordance with the applicants licence obligations, advice in the NPPF and the Code of Practice and represents the least environmentally intrusive, technically suitable, available option. It has been demonstrated that there are no more suitable sites that could provide this essential service to this cell area.

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 is a strong material consideration in the determination of this application. It is fully supported by the NPPF, UK Wireless Digital Infrastructure Strategy, the Mid Sussex District Plan, the Ashurst Wood Neighbourhood Plan, the High Weald AONB Management Plan and the Gatwick 360° The Coast to Capital Strategic Economic Plan. These benefits are strong material considerations which outweigh any perceived loss of visual amenity to the surrounding area.

We confirm that submitted drawings have been checked for accuracy.



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