SUPPLEMENTARY INFORMATION

The operator has previously applied for prior approval for the proposed erection of a 18.0m monopole, supporting 6 no antenna, together with 3 no ground based cabinets, 1 no meter cabinet and ancillary development including compound fencing (LPA Ref: P/42/25/TEL) at Church Farm Holiday Park.

The application was refused on the following grounds:

'By reason of its siting and appearance within this location, the proposed telecommunications equipment would appear unduly obtrusive and would be detrimental to the character and visual appearance of the area in conflict with TEL DM1 of the Arun Local Plan'.

The operator has reconsidered the siting and design of the proposed development and as such the proposed installation has minimised the siting and appearance in so far as is possible and is proposed to ensure that enhanced 2G and 4G coverage and capacity and new 5G services are provided in and around this area of Bognor Regis. The application is supported by photomontages.

1. Site Details

Site Name:	Church Farm Holiday Village	Site Address:	Land at Church Farm Holiday Village Church Farm Holiday Village Church Lane Pagham Bognor Regis PO21 4NR
National Grid Reference:	E: 488366 N: 097259		
Site Ref Number:	31638	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)

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?		No
If no explain why: No mast register publicly available.		
Were industry site databases checked for suitable sites by the operator:	Yes	

[1] Macro or Micro

If no explain why: N/A

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	No
Date of pre-application contact:	N/A
Name of contact:	N/A
Summary of outcome/Main issues raised: A copy of the proposed plans together with a covering letter were sent to the Chief Planning Officer by email on 29.01.2025 in respect of LPA Ref: P/42/25/TEL and 25.02.2026. At the time of making the application, no formal site specific response had been received to pre-application.	

Community Consultation

Rating of Site under Traffic Light Model:	~~Red~~	**Amber**	~~Green~~
Outline of consultation carried out: Prior to the submission of this application the applicant undertook consultation discussions with the LPA and relevant stakeholders. This provides an opportunity for the LPA and stakeholders to discuss the development proposals and identify specific issues early. Consultation was carried out with Pagham Ward Councillors, Pagham Parish Council, Jessica Brown-Fuller MP. Pre-application consultation letters and drawings of the proposals were sent by email to all parties on the 29.01.2025 in respect of LPA Ref: P/42/25/TEL and 25.02.2026.			

Summary of outcome/main issues raised (include copies of relevant correspondence): On 02.02.2025 the following response was received from the casework for Jess Brown-Fuller MP: *"After taking advice from other MPs and the House, Jess does not comment on individual planning applications. That being said, Jess and her office does watch local planning applications closely and monitor their outcomes.* *If you haven't already, we would encourage you to get in contact with the relevant local District Councillor about the application if you haven't already, since they have a remit over planning and will be able to give you better support on this application than Jess and her office can."* On 12.02.2025 the following response was received from Pagham Parish Council: *"Members considered your proposals at a meeting of the Planning Committee held on 11th February 2025. We note that this proposal is for the same site as the application submitted to Arun District Council with reference P/138/23/TEL In response to that application the Parish Council objected to the proposals for the following reasons:* *The Council is very concerned at the visual impact of the proposed mast on the surrounding area. The caravans are only around 3m tall, and the proposed mast is 23.14m and will be very visible for residents and visitors. It is not in keeping with the character of the area and would be intrusive. As identified by the Conservation Officer, there are heritage assets in the vicinity of the site of the proposed mast. We believe there would be harm to the settings of these assets if this mast were to be permitted.* *We note that this proposal would include a mast at a height of 18m. Unfortunately the Council does not feel this reduction is sufficient to reduce the impact on the heritage assets and their setting to an acceptable degree, and it would be overbearing on the caravans surrounding the mast. We would therefore OBJECT to these proposals on the same grounds as the previous application."* No other responses have been received at the time of making this revised application on the amended design.

School/College

Location of site in relation to school/college (include name of school/college): None nearby in terms of the 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: Due to the proximity of the development to Bognor Regis Lec Airfield an aerodrome notice was sent to the airfield on 26.03.26 to notify them of the proposal. Copy of the notice and proof of delivery is enclosed.		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	23.03.26 – Copy of notice and proof of delivery enclosed.	

3. Proposed Development

The proposed site:

Background

Freshwave on behalf of Vodafone are in the process of identifying a suitable site in the Pagham area for a radio base station that will enhance service provision. As part of Vodafone's continued network improvement program, there is a specific requirement for a new radio base station installation at this location to provide additional coverage and capacity for the operators in the area. The proposal will ensure the area has reliable 2G and 4G provision as well as new 5G services to the area.

Vodafone are limited in siting options as there is a requirement to fill this gap in coverage for this area including Haven Holiday Park and its surrounds. Vodafone need to maximise data across the holiday park which relies on even distribution across each sector namely 360 degree coverage. The proposed site will fill this gap in coverage for this busy tourist location and its wider more remote surrounds, including Pagham Beach and Pagham Lagoon.

The Application Site

This application relates to a new telecommunications installation at Haven Church Farm Holiday Village, Church Lane, Pagham, Bognor Regis, PO21 4NR (NGR: E488366, 097259) approximately 500m from Pagham Beach. The application site is located immediately to the south west of the main building complex in the centre of Haven holiday park. The area immediately surrounding the application site is predominately characterised by static caravans and commercial uses associated with the holiday park.

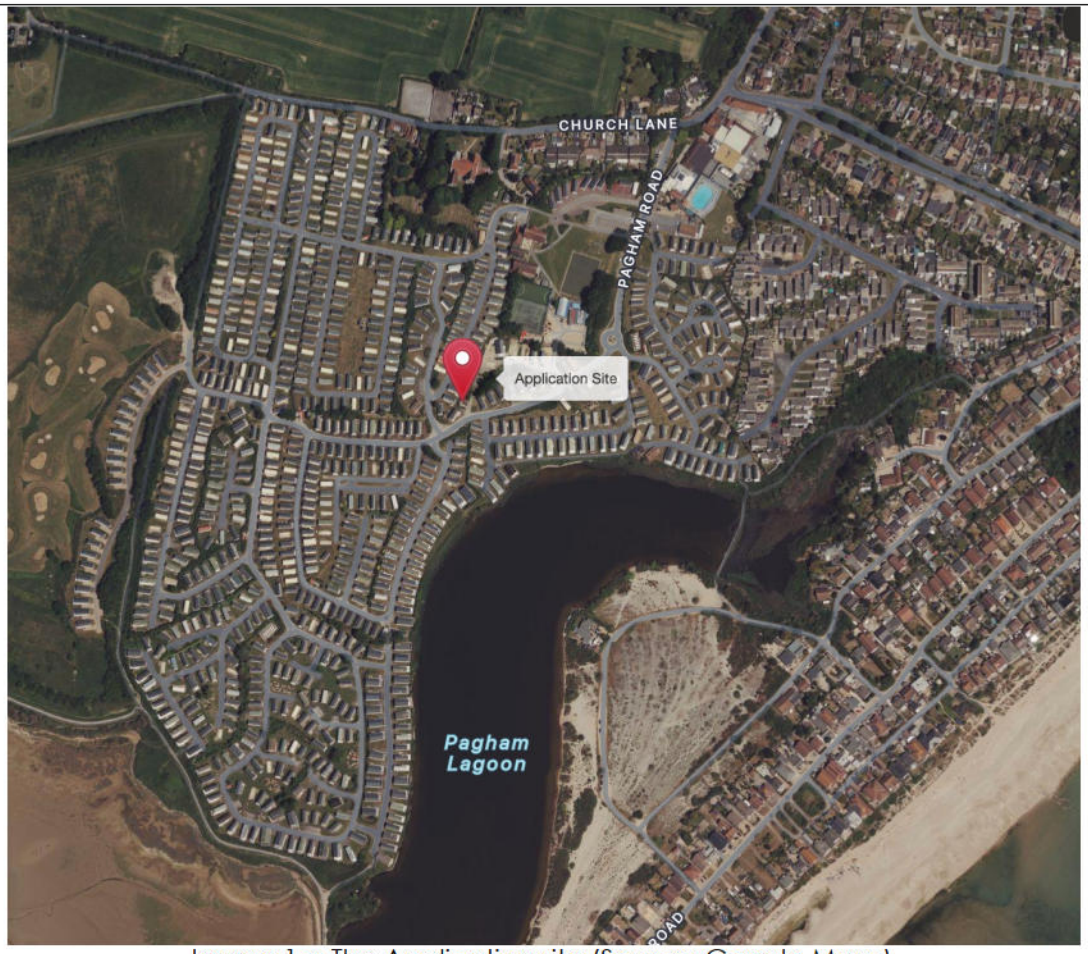


Image 1a: The Application site (Source: Google Maps)



Image 1b: The Application site (Source: Google Maps)

The proposal is for the installation of a telecommunications base station comprising a 15m monopole supporting 3 no antennas together with 2 no ground based cabinets and ancillary development thereto.

The proposed equipment will be viewed within the context of the existing built form, being the largely building on the holiday park complex, this in combination with the existing fencing surrounding the application site will aid in screening the development, particularly the lower section of the mast, along with the cabinets and compound fencing.

The application site is within the centre of the holiday park which is on low ground, the undulating land rises around the site.

There are a number of linear structures within both the immediate and wider vicinity of the application site including lighting columns, satellite poles, CCTV poles, and both road and commercial signage, as well as flag poles and telegraph poles and associated overhead lines within the landscape, which will all help the equipment assimilate with its surroundings. Please refer to the photomontages which form part of this planning application.

The site is not located within a Conservation Area or any other designated Article 2(3) land. However, it is noted that the site is within the setting of the Beckett's Barn (Scheduled Ancient Monument) and

adjoining earthworks and Becket's Barn (Grade II Listed), circa 90m from Pagham Harbour (which is a SSSI, Local Nature Reserve, Ramar Site and a Special Protection Area).

Whilst there are static caravans within close proximity to the application site to the north, east, south and west.

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.

Improving digital infrastructure supports the Government's agenda, by helping local areas to retain and attract businesses and talent as well as by reducing regional inequalities. It also helps deliver the aspirations of the UK Wireless Digital Strategy Infrastructure Strategy. The proposed site will infill the 2G and 4G coverage and capacity which is much needed for reliable connectivity as well as new 5G services and will ensure good quality critical infrastructure to support strong inclusive communities and contribute to economic opportunities.

A new installation at Haven Church Farm Holiday Village will ensure that the latest high quality 2G and 4G coverage is provided for Freshwave on behalf of Vodafone, in and around this area of Pagham.

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

The operators are seeking to infill a gap their coverage in the local area with a new radio base station, to ensure there is high quality coverage in this area. Vodafone need to maximise data across the holiday park which relies on even distribution across each sector namely 360 degree coverage. The new installation will allow Vodafone to provide their 2G and 4G technologies and also new 5G services to this part of Pagham Bognor Regis.

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 provide 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.

A new site in this location will ensure that the security of the latest technologies will be provided into the network particularly for the data hungry applications of the latest smart hand-held devices. The operators have followed a sequential approach to site finding and identified this site as part of this process.

4G signals by their very nature (as they carry high data rates) do not penetrate over long distances, (5G even less so), just a few hundred metres, depending on the topography of the land, building clutter and vegetation including trees in the area which can reduce their effectiveness.

Type of Structure *(e.g. tower, mast, etc): 15m streetworks poles*	
Description: The proposed installation of a telecommunications base station comprising a 15m monopole supporting 3 no antennas, together with 2 no ground based cabinets and ancillary development thereto.	
Overall Height:	15.00m (Top height of antennas)

Height of existing building *(where applicable)*:	N/A
Equipment Housing: 2 x Cabinet	
Length:	TBC
Width:	TBC
Height:	TBC
Materials (as applicable):	
Tower/mast etc – type of material and external colour:	Steel – Grey (Can be any other colour as appropriate if requested by the LPA)
Equipment housing – type of material and external colour:	Steel – RAL 6009 Fir Green (Can be any other colour as appropriate if requested by the LPA)

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

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

Following a sequential approach to site selection, further details of which are provided below, a ground-based mast at the nominated site was deemed the best available option.

Once the site was selected, the network planning team and design teams undertook a detailed site assessment to ascertain what equipment would be required to fulfil the operational brief from this location. This involved the use of network coverage prediction software tools and an onsite panoramic assessment to determine the necessary antenna and dish heights, orientations and numbers for optimum coverage and integration in the network to be achieved.

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

- **Antennas**
  - Need to be located at a height to transmit effectively and efficiently without signal being impeded by surrounding manmade and natural features within the landscape, known as clutter. Because 5G technologies operate in higher frequency bands than older technologies, attenuation of the radio signal is naturally higher and more prone to the effects of clutter. This means that operators will often require a higher structure or antenna position to achieve the same degree of coverage footprint as preceding generations.
  - Where possible, the antennas should also be tilted and orientated according to bespoke need and to maximise coverage, allowing them to best 'see' their target area.
  - They also need to be located at a height and in a position to ensure ICNIRP compliance. (If a shared solution is being proposed then the antennas also need to be appropriately separated to prevent interference between the operating systems).
  - If a site is to be shared, each operator's antenna system needs to be separated to prevent interference between the two sets of apparatus.

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

- **Cabinets**
  - Required to house the equipment that allow the antennas to function, these need to be located at the base of the mast to allow the feeder cables to run up the mast to serve the antennas. Seen on their own merits equipment cabinets and meter pillars are permitted

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

The multiskilled design visit, onsite assessments and software predictions concluded that a 32m to underside of 5G antenna height would be necessary for new ground-based mast at the nominated site in order to clear the immediate clutter, specifically the mature trees in the locale, and be able to serve both the settlement area to the north, east and south, along with the adjacent section of M60.

The only available design option for this height requirement, is a lattice mast. A set of standard cabinets are required to serve the antennas.

Due to the height needed a 'camouflaged' or 'disguised' design option is simply not possible.

The proposal seeks to minimise siting and appearance in so far as possible whilst meeting operational need.

Further details in relation to each of the ground-based mast options, and those for building-based solutions, have been provided in **Appendix A** to this Statement.

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 operate their networks in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision	Yes	

As part of the operator's networks, 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 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

Operational Brief

As indicated above, the proposed development that forms the basis of this application has been devised by Vodafone, on behalf of the operator, Vodafone to provide maintained and improved network coverage and capacity in the locale providing the latest 4G technologies whilst establishing new superfast 5G services to users that live, work and travel in the Aldler Forest area and the section of the M60 that sits to the west.

Operational Justification

It is also absolutely imperative that modern communications network infrastructure is located in the area for which it is to serve and that the infrastructure capacity is in place to cope with demand. Furthermore, in seeking a replacement for any established base station site, proximity to the existing infrastructure is key. If the new site is replicate existing coverage and fit seamlessly into the existing and planned network for the wider area.

Please note that Freshwave would not be choosing to deploy new infrastructure unless it were the only means of addressing their network requirements, as there are significant financial and time and effort implications for doing so. Indeed, as can be appreciated from the planning history and options that have gone before, the need for a replacement site has been ongoing for several years, in which such

is the need for coverage and capacity the focus to find a solution to address the connectivity issues in the area continue to intensify.

Before deciding to pursue a new base station development, the possibility of upgrading and optimising the existing sites in the wider network to fulfil the coverage requirements in the intended target area has been evaluated but the peripheral positions of the neighbouring cell solutions mean they are simply too far removed to be able to fulfil the operational brief.

Demand and Expectation

The dynamic nature of technological advances in the telecommunications industry coupled with ever increasing demand from subscribers dictates a continual reinvestment programme on the part of licenced operators and as a result, and in line with their licence requirements, companies such as Freshwave are constantly developing, refining and modernising mobile network infrastructure.

To set the scene on the growing demand for effective communications networks over recent years we would refer the reader to the following Ofcom publications. One would first draw attention to an Ofcom discussion paper publication entitled 'Mobile Networks and Spectrum', dated 09 February 2022[2], which considers the future demand for mobile services encouraging longer-term thinking about spectrum for mobile networks and how consumer and business needs can be met. Section 2 of the paper includes the following information under the subheading 'The growth of mobile':

> *"In recent years we have seen an average 40% year-on-year growth in demand for mobile services provided over public mobile networks. This growth has been driven by the development of new applications and enabled by evolving technologies and consequent changes in consumer behaviour.*
>
> *We expect demand for mobile data will continue to grow as we rely on it ever more to carry out daily activities like shopping, gaming, banking and watching movies. Demand is likely to be stimulated further as new and more sophisticated applications are developed, and by the development of machine-to-machine and machine-to-device applications."*
>
> Paragraphs 2.5-2.7

In publishing the discussion paper, Ofcom welcomed stakeholder inputs on the initial thinking, including on the potential opportunities and challenges associated with network densification in the UK and whether there are opportunities for more spectrum to be made available for mobile use on a local basis, so that they may then develop a future strategy for mobile spectrum.

Following on from the above, a conclusions paper has since been published by Ofcom on 06 December 2022, entitled 'Ofcom's future approach to mobile markets and spectrum'[3], within which Section 1 'Overview' confirms:

> *"We expect demand for mobile data to continue to grow as greater use is made of data-hungry services and as new technologies enable new uses."*
>
> Paragraph 1.1

And continues under the subheading 'Our future approach':

> *"Network quality is likely to be of growing importance to customers."*

[2] https://www.ofcom.org.uk/__data/assets/pdf_file/0017/232082/mobile-spectrum-demand-discussion-paper.pdf

[3] https://www.ofcom.org.uk/__data/assets/pdf_file/0036/248769/conclusions-mobile-spectrum-demand-and-markets.pdf

So, there should be no doubt that there is a customer expectation and Ofcom requirement for continued investment by operators to ensure they accommodate ever-increasing customer demands with network quality and improvement where necessary.

Who will be benefit from improved coverage and capacity?

According to recent figures published by MobileUK[4] it was estimated that there are 87 million active mobile subscriptions in the UK and according to recent figures produced by www.which.co.uk [5]in an article titled 'Best and Worst UK mobile networks', the customer base of the operators involved in the proposal are as follows:

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

Based on these figures, one can assume that a similar percentage of mobile network users in the local area would benefit from the proposal. It should, however, be noted that these figures do not include customers who use each of the operators' Mobile Virtual Network Operators (MVNOs)[6]. Most MVNOs do not publicly release subscriber counts but those that will benefit from the proposal include the following:

- Vodafone: Voxi, Lebara Mobile, Talkmobile, Asda Mobile

How people in the UK are using mobile communications networks

The 'Online Nation Report 2025'[7] produced by Ofcom and published in December 2025, confirms the following:

- UK adults spend an average of 4 hours 30 minutes a day online
- Smartphones accounted for the majority of online time for both genders (men: 75%; women: 79%).

Not everyone, especially those in more rural or lower income areas, has access to fixed broadband, so many rely on smart devices tends to get online. Because mobile connectivity is now essential to daily life, inadequate mobile infrastructure can prevent users from accessing vital digital services. If these gaps persist, the Government's wider digital goals will not be achieved.

How mobile networks operate

The reader may be aware that cellular networks are made up of a series of individual cell areas, each of which has a base station within it to provide service to that particular area. Each base station has a maximum capacity for traffic, (i.e., the number of handset users that can connect to it at any one time), and oversubscription by users will result in poor customer connection experience such as connection failures, dropped calls and a reduction in mobile broadband data speeds for both uplink and downlink. It is therefore imperative that adequate network infrastructure is in place to cope with demand.

[4] https://www.mobileuk.org/mobile-facts
[5] https://www.which.co.uk/reviews/mobile-phone-providers/article/mobile-phone-provider-reviews/best-mobile-networks-overview-amhDx1F0z41t
[6] MVNOs are providers that offer mobile services without their own signal or infrastructure, i.e., they piggyback on one of the four major networks, i.e., those listed above and EE
[7] https://www.ofcom.org.uk/siteassets/resources/documents/research-and-data/online-research/online-nation/2025/online-nations-report-2025.pdf?v=409837

A good analogy for describing a cellular network is that of a patchwork quilt with each cell area being one of the many patches that are sewn together making up the network 'quilt'. The base stations themselves will require a supporting structure, such as a mast or high building, to support antennas and dish and to elevate such transmission equipment above clutter, such as tall trees and buildings and whilst taking account of topography, all of which that could impede signal, and to ensure ICNIRP compliance. Associated cabinets for housing radio equipment and power connections are also deployed to service the antennas.

Telecommunications base stations receive and transmit to mobile devices using radio waves. The antennas operate like an aerosol spray with signal transmitted along a central orientation and dissipating with distance. Transmission dish links (which are required where fibre connections are not available) operate on a direct line of sight basis, linking with dishes on other base station sites elsewhere within the wider network. The dish or fibre links also connect the base station to a master control centre that manages the call handover process that occurs when a mobile user moves from one cell area to another, whilst also providing telemetric monitoring to ensure the site is working properly and offer remote maintenance.

Mobile connectivity, service and capacity is required where customers live, work, travel and enjoy recreational time. In the early days of mobile communications, peripheral locations, high-level topographies and large-scale masts were often identified in order that transmission from a new base station could cover an expansive geographical area. However, whilst this approach was viable for early network generations, the number of mobile device users and the need for connectivity has dramatically increased with time, as have the advancements in mobile technology itself. Quite often it can be the case that although a degree of coverage is available in an area, demand exceeds the base station's capacity meaning that calls, text and data usage services are not available to all those wishing to use the network. As a result, the cellular network construction and operational criteria have changed over time too. Because modern networks use higher frequencies with faster data rates whilst serving significantly increased numbers of mobile device users, typical network cell areas (i.e., the geographical area targeted for coverage and capacity for which a base station development provides a solution), are now smaller in their geographical expanse and tend to be directly proportionate to the number of users within it. They are also, therefore, greater in their number with base stations operating at a lower power output than their predecessors.

It must be noted that in December 2021, the UK's MNOs confirmed to the Government (the Department for Digital, Culture, Media & Sport - DCMS) that they will not offer 2G or 3G services beyond 2033. VMO2 have begun to switch off their 3G network as doing so will free up spectrum for 4G and 5G networks, enabling customers to benefit from better, faster and more reliable services. The 2G and 3G networks rely on older technology and transitioning them to newer 4G and 5G services involves increased operating costs, as well as a less efficient use of spectrum and energy.

It is critical to understand that the historical 4No. UK MNOs 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 radio frequency spectrum has variations in terms of frequency propagation. Therefore, each individual MNO's network, and their sharing arrangements, cannot be compared directly and there will be variations in how each of these networks is deployed and developed. For this reason, all MNOs, have a completely different network configuration that they need to fit within and build 5G service around. Therefore, the networks must be built differently, involve taller heights to overcome ICNIRP exclusion requirements, with different antennas and equipment, to take account of those spectrum and licence variations. This will in turn lead to necessary infrastructure variations on a cell-to-cell basis, depending on site specific demand, local constraints and requirement. As such, the individual networks will have variations in how their infrastructure is deployed and developed.

Public Benefit

It is undeniable that mobile communication is now a key part of sustainable development and a vital tool in our personal lives and in both business activities and government operations. Indeed, the demand for faster and improved mobile connectivity continues to grow with modern society now expecting to be able to make use of mobile devices to their full potential where people live, work and travel. Each new generation of mobile communications technology has provided us with higher speed, better connection, and many more advanced features on our mobiles, and now with 5G, we can expect to experience an even more extensive range of telecommunication services. There is, therefore, a drive by the Government to ensure that all communities, both urban and rural, have access to the most up to date mobile technology, given the clear sustainability, social and economic benefits for doing so. Indeed, the new Government in Westminster has indicated that further reforms will take place to streamline the delivery process for critical infrastructure, which includes telecommunications, as outlined in their 2024-25 agenda via the King's speech on 17 July 2024.

The above is reflected in Chapter 2 'Achieving sustainable development' of the NPPF, which states:

> *"The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs…"*
>
> Paragraph 7, NPPF

The NPPF goes on to define its three interdependent and overarching economic, social and environmental objectives.

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

- Economic benefits

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

- Social benefit

  - Mobile communications can help people to stay in touch wherever and whenever, which can help improve social wellbeing
  - Convenient access to online commerce or businesses
  - Contacting emergency services is easier, especially in remote areas
  - Giving the ability to manage our personal finances and information 24/7
  - Using a mobile wherever you go can provide better personal security

- Having access to social networking sites and applications can keep people entertained with their lifestyles and interests
- Access to real-time transport information or timetables
- Smart meter reads for utilities such as gas or electric
- Contacting local authorities
- Promotion of smarter and productive ways of working. For example, working from home can help minimise commuting which can provide better work and home life balance

- Sustainability and Environmental benefits

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

- Health benefits

  - Support the delivery of healthcare provision and accessibility by enabling people greater access to online services, NHS appointment reminders, reminders to take medicines, make appointments etc.
  - Patients across the country are now becoming accustomed to using remote healthcare services such as NHS 111, virtual GP appointments, and ordering online deliveries of essential medical supplies.
  - 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high-definition images and video), increased capacity and heightened security are going to be fundamental in scaling the patient benefits of remote healthcare and keeping medical records secure and private. For instance, trials have shown that connecting ambulance crews to expert resources using 5G allows paramedics to work with doctors and conduct specialist procedures in real time whilst on the road.

- Education benefits

  - Facilitates access to educational establishment databases or booking systems for securing places for the likes of school dinners, field trips, extra-curricular activities, student/teacher reviews, etc.
  - Provides access to school/college/university apps for setting and submitting homework/coursework, ensuring news and notifications are delivered efficiently, and for parent/student/teacher interactions.
  - The relationship between 5G and education is evolving at a massive rate with educators exploring the relevance of Virtual Reality (VR) technologies for education and training. Crucially, VR can support remote learning, allowing students a presence in the classroom even when working elsewhere.

5. Site Selection Process

Alternative sites considered and not chosen (not generally required for upgrades/alterations to existing sites including redevelopment of an existing site to facilitate an upgrade or sharing with another operator)

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

A Sequential Approach to Site Selection

With full respect to national and local planning policy preferences, a sequential approach to site selection was adopted, with the following factors having each been considered in order:

- Is there any existing base station within the operator's network that, if redeveloped or upgraded, could address the operational requirement and, if so, would this option represent an appropriate balance between operational and planning considerations?
- Is there any existing base station within another operator's network that, if redeveloped or upgraded, could address the operational requirement and, if so, would this option represent an appropriate balance between operational and planning considerations?
- Are there any opportunities for the deployment of the operator's base station on a rooftop or at another structure and, if so, would this option represent an appropriate balance between operational and planning considerations?
- Is a new ground-based mast the only available option and, if so, would this option represent an appropriate balance between operational and planning considerations?

In seeking to identify a viable option capable of fulfilling the operational brief, the site selection process also has to take account of the following factors:

- Development must take place at a location within the target area / defined search area.
- The base station must have access to a power source and the cost for connection must be within budget. Excessive grid connection costs can render certain base station developments financially unfeasible.
- Reasonable access for construction, maintenance and decommissioning purposes must be achievable
- The development must be able to facilitate the antennas being able to 'see' the area they are to serve, i.e., the antennas will need to protrude above surrounding clutter to ensure effective signal transmission and avoid infringement.
- The base station development must be able to achieve compliance with ICNIRP Certification requirements.
- The base station development must be able to connect within the wider network via a fibre connection or a transmission dish link that can achieve direct line of sight with other base stations in the network.

Siting and Design Considerations

The reader will appreciate that Freshwave has several options available for use in their design portfolio. As outlined in **Appendix A**, these range from building-based solutions including stub masts, pole-mounted supports, and wall-mounted antennas. Ground-based masts designs include lattices, monopoles with open antenna headframes or street furniture style masts. At ground level a base station will typically involve equipment cabinets and electricity meter pillars that range in size but will be of similar appearance to those deployed by utility companies. Subject to the site-specific design, i.e. if a mast is 'climbable', and there is available space, then some ancillary development may include a fenced compound for security purposes.

Rooftop site considerations

When considering the potential viability of a rooftop site or the use of another structure, one must take account of the following factors:

- Height
  It is imperative that the building or structure is of sufficient height, or can accommodate an antenna support of sufficient height, to allow the antennas 'see' the area they are to serve without being impeded by clutter. The height which a proposal protrudes above the roof can be implicated by the weight of the installation and its wind loading.

- Type of building/structure
  Not all buildings or other structures will be viable for use and operators have a duty of care to ensure that their equipment is installed safely. For example, attaching apparatus to light weight, wooden rafters and joists is simply not an option, as these are just not strong enough to support the weight of modern communications apparatus. Mounting equipment upon walls or gable ends also requires sufficient bracing to account for wind loading and stability requirements, requiring bolts through the entire wall and fastened internally via a number of back plates. This would have legal implications and would be intrusive for the occupants, both during construction and maintenance with the backplates requiring to be checked at least once a year on routine maintenance visits. Also, telecommunications equipment cannot be supported on sloping roofs due to the simple laws of physics and the fact that such roof types offer nothing for the equipment to attach to. As such the equipment would slide off under its own weight taking any roof surface with it.

- Equipment weight and structural soundness
  One must consider the structural integrity of the building and the support structure in terms of the weight of the proposed antennas and the associated wind loading requirements. Each modern antenna weighs approximately 50kg and would need to be supported by 3No. Remote Radio Units, each of which weighs approximately 30-35kg, i.e., 12No. antennas and 36No. RRUs for a shared rooftop site would weigh in the region of 1.6 tonnes minimum excluding any support structures, steelwork or feeder cabling. On this basis the transmission equipment for a single operator site requiring 6No. antennas and 18No. RRUs would weigh in the region of 0.8 tonnes minimum.

  Also, consideration needs to be given to the support structure and steelwork required to accommodate the antennas at the required heights, be it a wall-mounted bracket, a wall-mounted support pole, a pole-mounted antenna scheme deployed upon streel grillage for stability or a stub mast. Please note that a 10m stub mast with headframe including the supporting steel grillage (excluding

antennas, RRUs and feeder cables), weighs approximately 4.3 tonnes. Without the headframe the weight would be circa 2 tonnes (excluding antennas, RRUs and feeder cables).

Other weights that need to be accounted for include any cabinetry and the steel grillage upon which these elements must be set, the feeder cables that link the antennas to the cabinetry, and any handrailing required for health and safety purposes.

Undertaking significant structural alterations or modifications to buildings to make them capable of accommodating such weights is not an option for Freshwave. Therefore, if a building fails a structural survey, then the building is not suitable for use. In certain cases, it is obvious that the structural integrity of a building is an issue without the need for a detailed survey, as they were simply not built or designed to accommodate telecommunication infrastructure development of the form and weight required. In addition, standard 2-3 storey buildings are not tall enough for multigenerational technologies to be accommodated at heights that will meet ICNIRP certification and avoid signal infringement, (5G being more prone to signal attenuation), by surrounding clutter, as the supporting structures would need to be taller than the host building itself, which would put undue stress on the building, especially when wind loading is taken into account. Lastly, from an aesthetical point of view, it is important that rooftop telecommunications development is proportional to the scale of the host building as deploying a support structure that far exceeds the height of the host building would look extremely out of place and prominent.

- General Health and Safety
  The site in question must be capable of accommodating ancillary development required for health and safety of those that will be maintaining the site, i.e., the use of handrailing or latch systems, hooped ladders and resting platforms.

- ICNIRP
  To achieve ICNIRP compliance the operator must be certain that access to the antennas, be they on a rooftop or ground-based structure, is restricted to authorised personnel only. They must also consider if the available antenna locations will ensure ICNIRP compliance with neighbouring buildings, other operator's antennas present nearby, and any accessible areas at height. In this regard horizontal and vertical separation is essential for those that might be maintaining neighbouring lighting columns, trees and windows so that they do not unknowingly encroach upon the exclusion zones around the live antennas.

- Signal Clipping
  Clipping occurs when the expanse of a rooftop itself and or corner sections reflects the signal transmitted by the antennas. To avoid this, antennas either need to be positioned close to the edge of the roof or at a greater height in a central location to allow for the angle of signal propagation to clear the immediate rooftop obstacle. Please refer to diagram below which is 'Scenario 1' in the Code of Practice for Wireless Network Development in England - Annex C – Rooftop Developments.

Ground-based site considerations

When considering potential development options for new ground-based masts, there are several non-planning based general considerations that must be taken into account, namely:

- Underground utilities and services

  The presence of underground services is commonplace, especially at roadside and adopted highway's locations. Underground services can limit the usable space, preventing necessary mast foundations from being achieved, rendering developments unviable. It is not possible to build on top of underground services. Whilst it may sometimes be possible to undertake diversions of existing services to facilitate development, subject to available route/space, one must appreciate that such works come at a cost and to do so can render the base station development financially unfeasible. Not all underground services can be diverted, and their presence influences the viable position of a base station given the retained clearances and easements that utility companies still require in order to access and maintain them.

- Overhead utilities and services

  The presence of overhead services can be problematic, not just for the construction of ground-based masts, but also for their operation, as operators must ensure that ICNIRP guidelines are adhered to and that those maintaining such infrastructure at height do not encroach upon the exclusion zones around the proposed antennas. Again, whilst it may sometimes be possible to undertake diversions of existing services to facilitate telecoms development, subject to available route/space, one must appreciate that such works implicate on the utility company and the services they provide to their customers, hence this comes at a cost and to do so can render the base station development financially unfeasible. Not all overhead services can be diverted.

- Presence of trees

  Developments must seek to minimise the risk of conflict with the root protection areas and overhanging canopies of mature trees to limit impact upon the health of the tree(s) in question. This matter becomes more sensitive when dealing with protected trees such as those in Conservation Areas or that are subject to Tree Preservation Orders. One must also appreciate that whilst trees can provide useful screening for ground-based masts, the antennas must be of sufficient height above the trees to provide effective coverage to the target coverage area and to ensure that signal transmission is not impeded. Especially when trees are in leaf and when wet, it impacts on the propagation of the signal as the tree foliage will absorb the radio frequency meaning the signal is broken or lost, hence the need for height and the full length of the antennas to clear the immediate natural clutter.

When considering potential development options upon adopted highways land, or at roadside or pavement locations, there are several other general considerations that must be taken into account, namely:

- Existing street furniture

  The presence of other street furniture elements, such as streetlights, telegraph poles, cabinetry, signage and other street furniture elements, can limit the usable space in / on adopted verges or footways and/or create an unacceptable level of clutter. The presence of such elements can often restrict new street furniture base station development to locations that may impact pedestrian flow or impede highways safety requirements, both of which must be avoided for the development

to be viable. The presence of vertical street furniture elements like telegraph poles and streetlights can be problematic as operators must ensure that ICNIRP guidelines are adhered to and that those maintaining such infrastructure do not encroach upon the exclusion zones around the proposed antennas.

- Points of access/egress to private properties

  In built up areas, both public and private properties will often benefit from off-street parking, driveways, entrance and exits points and pedestrian routes in and out of the building. It is important that the development of street furniture base stations in roadside locations next to these types of arrangements does not compromise pedestrian and vehicle movements, access arrangements to properties nor impact on highway safety.

- Highways and pedestrian safety requirements

  When nominating a site for street furniture base station development, it is imperative that the infrastructure does not infringe upon visibility splays and meets the requirements of the Department for Transport's 'Inclusive Mobility' guidance document, for safe passage of pedestrians, including those using pushchairs and wheelchairs, see below for details. It is also important that the speed limit of the road is taken into account as this can sometimes mean a requirement for the installation traffic barriers for road safety purposes.

- Design limitations of street furniture masts

  Street furniture mast are the slimmest structures available for use in operators' design portfolio and tend to be used in roadside locations and in more sensitive settings such as suburban or residential areas.

  Street furniture masts can only accommodate 3No. sector antennas at any one height and these must be set at 120° separations due to being positioned in a rigid, back-to-back formation. This prevents operators from being able to orientate or tilt antennas to direct their signal to the specific areas. Street furniture mast solutions are therefore much more limited in terms of operational potential when compared with the likes of a rooftop solution, or a monopole with an open headframe or lattice structure, all of which can provide bespoke antenna layouts.

As explained throughout this statement, the proposed new site is required to infill the current gap in coverage in this area, including Haven Holiday Park and its surrounds for both operators. The proposed site will fill this gap in coverage for this busy tourist location and its wider more remote surrounds. The proposed site will provide coverage for Vodafone in the area. The search area is limited as the proposed installation needs to be sited to provide optimum infill coverage to this area and 360 degree coverage.



Image 2: Map of Search Area (outlined in blue)

List of Discounted Sites

Discounted Option and Site Type	NGR	Address and Site name	Reason for discounted Option
Discounted Option 1 - Rooftop	E488567, N97472	Swimming Pool Roof, Haven Church Farm Holiday Village, Church Lane, Pagham, Bognor Regis, PO21 4NR	Due to the construction of the building there is no design available to support the operator's apparatus and provide the necessary coverage to the target coverage area.
Discounted Option 2 - Rooftop	E488587, N97496	Haven Church Farm Holiday Village, Church Lane, Pagham, Bognor Regis, PO21 4NR	The rooftop is too low in order to deliver the required level of coverage to the target coverage area. This site has therefore been discounted for this reason.

Discounted Option 3 - Greenfield	E488653, N97532	Haven Church Farm Holiday Village, Church Lane, Pagham, Bognor Regis, PO21 4NR	A site in this location would not be able to be built due to the lack of space and proximity of overhead power lines would make the installation of a radio base station in this location problematic. A site in this location has therefore been discounted for this reason.
Discounted Option 4 - Rooftop	E488607, N97515	Haven Church Farm Holiday Village, Church Lane, Pagham, Bognor Regis, PO21 4NR	This building is of a low pitched roof construction which is unsuitable for the siting of telecoms equipment. The applicant is only able to utilise flat concrete roofs that have the capacity to support other plant eg Air Handling Units. The applicants are not able to fix equipment to other types of roofs. The majority of the time the applicants need to fix to a solid support structure that can support the antenna loads in all directions such as a gable wall that has lateral support along the length of the roof. Notably, roof trusses are not considered suitable structures.
Discounted Option 5 - Greenfield	E488620, N97447	Haven Church Farm Holiday Village, Church Lane, Pagham, Bognor Regis, PO21 4NR	An installation at this location would be within close proximity to the play area and swimming facilities and is considered to be too exposed and not appropriate to deliver the required coverage to the target area. This site has therefore been discounted for this reason.
Discounted Option 6 - Greenfield	E488503, N97441	Haven Church Farm Holiday Village, Church Lane, Pagham, Bognor Regis, PO21 4NR	Locating the new column and cabinets in the car park of the holiday park would reduce the overall parking provision which is in constant demand. Any reduction in overall car parking spaces would detrimentally affect the daily operations of the holiday park. As such, this location has been discounted.
Discounted Option 7 - Greenfield	E488435, N97431	Haven Church Farm Holiday Village, Church Lane, Pagham, Bognor Regis, PO21 4NR	An installation at this location would be within the Becket's Barn Scheduled Ancient Monument and within close proximity to the Grade I Listed Church and development within this sensitive area should be avoided and other locations are considered to be more appropriate to deliver the required level of coverage to the target area.
Discounted Option 8 - Greenfield	E488476, N97314	Haven Church Farm Holiday Village, Church Lane, Pagham, Bognor Regis, PO21 4NR	An installation at this location would be within the Becket's Barn Scheduled Ancient Monument and development within this sensitive area should be avoided and other locations are considered to be more appropriate to deliver the required level of coverage to the target area.
Discounted Option 9 - Greenfield	E488096, N97313	Haven Church Farm Holiday Village, Church Lane, Pagham,	An installation at this location is considered to be too exposed and within close proximity to a PRoW and other alternatives exist which are more appropriate in order to deliver the

		Bognor Regis, PO21 4NR	required coverage to the target area. This site has therefore been discounted for this reason.
Discounted Option 10 - Greenfield	E488030, N97033	Haven Church Farm Holiday Village, Church Lane, Pagham, Bognor Regis, PO21 4NR	An installation at this location is considered to be too exposed and other alternatives exist which are more appropriate in order to deliver the required coverage to the target area. This site has therefore been discounted for this reason.
Discounted Option 11 - Greenfield	E488263, N96804	Haven Church Farm Holiday Village, Church Lane, Pagham, Bognor Regis, PO21 4NR	An installation at this location is considered to be too exposed and within close proximity to the Pagham Harbour SSSI/nature reserve/ramar site/SPA and other alternatives exist which are more appropriate in order to deliver the required coverage to the target area. This site has therefore been discounted for this reason.
Discounted Option 12 - Greenfield	E488261, N97313	Haven Church Farm Holiday Village, Church Lane, Pagham, Bognor Regis, PO21 4NR	An installation at this location is considered to be too exposed and surrounded by caravan plots and other alternatives exist which are more appropriate in order to deliver the required coverage to the target area. This site has therefore been discounted for this reason.
Discounted Option 13 - Greenfield	E488381, N97284	Haven Church Farm Holiday Village, Church Lane, Pagham, Bognor Regis, PO21 4NR	It is not possible to install a telecommunications installation at this location due to the proximity to the gas storage facilities. This site has therefore been discounted for this reason.
Discounted Option 14 - Greenfield	E488213, N97246	Haven Church Farm Holiday Village, Church Lane, Pagham, Bognor Regis, PO21 4NR	There is insufficient space at this location for a mobile telecoms installation, this site has therefore been discounted for this reason.
Discounted Option 15 - Greenfield	E488165, N97132	Haven Church Farm Holiday Village, Church Lane, Pagham, Bognor Regis, PO21 4NR	There is insufficient space at this location for a mobile telecoms installation, this site has therefore been discounted for this reason.
Discounted Option 16 - Greenfield	E488507, N97299	Haven Church Farm Holiday Village, Church Lane, Pagham, Bognor Regis, PO21 4NR	An installation at this location is considered to be too exposed with limited screening/backdrop and other alternatives exist which are more appropriate in order to deliver the required coverage to the target area. This site has therefore been discounted for this reason.
Discounted Option 17 - Greenfield	E488274, N97411	Haven Church Farm Holiday Village, Church Lane, Pagham,	Due to the proximity of a Listed Building development near this heritage asset should be avoided and other locations are considered to be more appropriate to deliver the required level of coverage to the target area.

		Bognor Regis, PO21 4NR	
Discounted Option 18 - Greenfield	E488148, N97432	Haven Church Farm Holiday Village, Church Lane, Pagham, Bognor Regis, PO21 4NR	There is insufficient space at this location for a mobile telecoms installation, this site has therefore been discounted for this reason.



Image 3: Map of Application Site and Discounted Sites (Source: NGR Grid Reference Finder)

If no alternative site options have been investigated, please explain why: N/A
Land use planning designations:

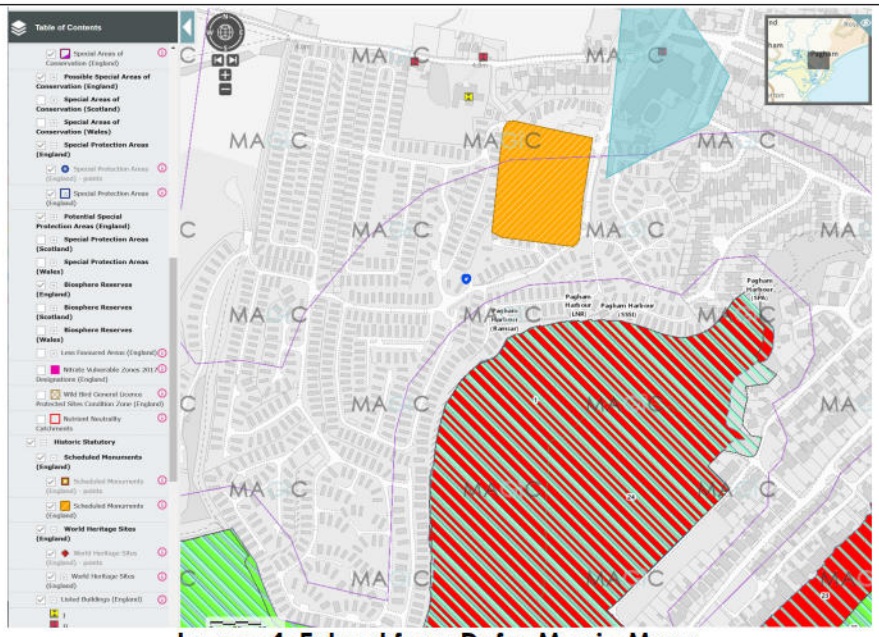


Image 4: Extract from Defra Magic Maps

The site is not located within a conservation area or any other designated Article 2(3) land. However, it is noted that the site is within the setting of the Beckett's Barn and adjoining earthworks (Scheduled Ancient Monument) and Becket's Barn (Grade II Listed). The site is located within Flood Zone 3 and circa. 90m away from Pagham Harbour (SSSI, Local Nature Reserve, Ramar Site and a Special Protection Area).

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.

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"…

Section 16 of NPPF relates to 'Conserving and enhancing the historic environment'. In respect of 'Proposals affecting heritage assets', Para. 207 states *'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation'.*

Para. 210 states *'In determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness'.*

In considering potential impacts Para. 212 states *'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'.*

Para. 215 states *'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'.*

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.

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 outs '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 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)".*

The added emphasis on support from Local Planning Authorities in the deployment in digital infrastructure is even more evident in the revised CoBP. The CoBP 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;*
- *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 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 for the area comprises:

- The Arun Local Plan 2011 – 2031 (July 2018)

The Arun Local Plan 2011 – 2031 (July 2018)

The Arun Local Plan 2011-2031 was adopted by resolution of Full Council on 18 July 2018.

The vision is; By 2031 Arun will be a safer, more inclusive, vibrant and attractive place to live, work and visit. Arun's residents will be healthier and better educated, with reduced inequalities between the most and least affluent.

Policy SD SP1 relates to 'Sustainable development' and states *'When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work pro-actively with applicants to jointly find solutions which mean that proposals can be approved wherever possible and to secure development that will contribute to the social, economic and environmental conditions south of the National Park through to the coast and throughout its settlements (both coastal and inland). This presumption will not be applicable where development requires an Appropriate Assessment or where consideration of the need for one is being undertaken'.*

Arun's Local Plan strategic objectives for Design is: *"To plan for climate change and work in harmony with the environment to conserve natural resources and increase biodiversity." "To create vibrant, attractive, safe and accessible towns and villages that build upon their unique characters to provide a wide range of uses and which are a focus for quality shopping, entertainment, leisure, tourism and cultural activities." "To plan and deliver a range of housing mix and types in locations with good access to employment, services and facilities to meet the District's housing requirements and the needs of Arun's residents and communities both urban and rural, ensuring that issues of affordability and the provision of appropriate levels of affordable housing are addressed while supporting the creation of integrated communities."*

Policy D SP1 relates to 'Design' and states: *'All development proposals should seek to make efficient use of land but reflect the characteristics of the site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details. Development proposals should have been derived from: a thorough site analysis and context appraisal; adherence to objectives informing sustainable design (inclusivity, adaptability, security, attractiveness, usability, health and wellbeing, climate change mitigation and habitats); and the influence these objectives have on the form of the development. With major developments (as defined in the GDPO 1995 (as amended(41)) or allocated sites in the Development Plan. In addition to a Design and Access Statement, a context appraisal, context plan and analysis of the site will also be required'.*

Policy D DM1 relates to *'Aspects of form and design quality'* and states 'When considering any application for development the Council will have regard to the following aspects (inter-alia):

1. *Character: Make the best possible use of the available land by reflecting or improving upon the character of the site and the surrounding area, in terms of its scale, massing, aspect, siting, layout, density, building materials (colour, texture), landscaping, and design features.*
2. *Appearance/attractiveness Demonstrate a high standard of architectural principles, use of building materials, craftsmanship and hard and soft landscaping to reflect the local area.*
3. *Impact Have minimal impact to users and occupiers of nearby property and land. For example, by avoiding significant loss of sunlight, privacy and outlook and unacceptable noise and disturbance.*

Para. 8.10.1 of the supporting text states *'Governments objective for the planning system is to facilitate the growth of new and modernisation of existing telecommunication systems in order to ensure that*

people have a choice of providers and services, and equitable access to the latest technology. Advanced, high quality communications infrastructure is essential for economic growth. The development of high speed broadband technology and other communications networks also play a vital role in enhancing the provision of local community facilities and services.

Policy TEL SP1 relates to 'Strategic delivery of telecommunications infrastructure' and states '*Direct access to high quality communications infrastructure, including superfast broadband, is required to promote economic growth and to improve access to goods and services and opportunities to work from home. All proposals for new residential, employment and commercial development must be designed to be connected to high quality communications infrastructure to ensure that fibre optic or other cabling does not need to be retrofitted. Where relevant, evidence to show that development cannot be directly connected to high quality communications infrastructure due to viability or technical reasons, must be provided. Where the installation of electronic communications equipment and cabinets is required to deliver high quality communications infrastructure there will be a presumption in favour of their development, subject to criteria set out in the Telecommunications Development Management Policy and other Local Plan policies*'.

Policy TEL DM1 relates to 'Telecommunications' and states

'Permission for telecommunications development will be granted provided that: a. There are no satisfactory alternative sites for telecommunications available; b. Alternatives have been investigated, including the possibility of mast sharing and mounting the antennae required on existing buildings or other structures c. Where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate; d. The proposal will not have an unacceptable impact upon the landscape, sites protected for nature conservation or heritage assets; e. The proposal will not have an adverse effect on the amenity of local residents; f. Proposals include full details of all new landscaping, screening and of any trees or vegetation to be retained on the site. In addition, details of a satisfactory scheme to return the site to its former or improved condition once operations have ceased are also required; g. Proposals include full details of the design and external appearance of the development including siting, colour and materials; h. Proposals include full details of associated developments, including access roads and other ancillary buildings to service the development and their likely impact upon the environment; i. Proposals have regard to aerodrome safeguarding (Circular 01/03: Safeguarding aerodromes, technical sites and military explosives storage areas); j. Communications infrastructure does not cause significant interference with other electrical equipment, air traffic services or instrumentation operated in the national interest. Applications for telecommunications development (including for prior approval under Part 16 of the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development. This should include: k. The outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed near a school or college or within a statutory safeguarding zone surrounding an aerodrome or technical site; l. For a new mast or base station, evidence that the applicant has explored the possibility of erecting antennae on an existing building, mast or other structure and for an addition to an existing mast or base station, and a new mast or base station, a statement that self-certifies that, when operational, International Commission guidelines will be met; and m. Where prior notification is required, the Council will require developers to demonstrate what attempts have been made to minimise impact through appropriate siting and design. Guidelines published by the Health Protection Agency Centre for Radiation, Chemicals and Environmental Hazards (CRCE) in respect of electromagnetic fields, will be taken into account in assessing proposals. The use of conditions or planning agreements will be considered to secure landscaping, as well as restoration of the site once operations have ceased. Proposals for the construction of new buildings or other structures must not cause interference with broadcast and telecommunications services. Developments shall also be consistent with all other Local Plan policies'.

Policy HER SP1 relates to 'The historic environment' and states: *The Local Planning Authority will grant planning permission or relevant consent for development proposals that conserve or enhance the*

historic environment of the District, based on the following approach: Designated heritage assets including listed buildings, structures and their settings; and Conservation Areas will be given the highest level of protection and should be conserved and enhanced in a manner appropriate to their significance. Non-designated heritage assets including locally listed heritage assets (Buildings or Structures of Character and Areas of Character) and their settings will also need to be conserved and enhanced in a manner appropriate to their significance and contribution to the historic environment; Development likely to prejudice any of the above, including their settings, will be refused. Any proposals for development will be required to comply with all other relevant policies and reflect any relevant appraisals or management proposals adopted by the Local Planning Authority. The Local Planning Authority will encourage the re-use of vacant or underused Listed Buildings or unlisted buildings by approving proposals that contribute positively to their conservation either individually or as part of wider strategies for regeneration. Where changes of use are proposed, the Local Planning Authority will consider these in a flexible way but will favour proposals which improve public access where these are not prejudicial to existing character or appearance. The Local Planning Authority will take a pro-active stance to any heritage assets that may be at risk. This will include working with property owners to find a use that will enable them to be put back in to use. Development proposals involving the demolition of Listed Buildings or substantial harm to a Conservation Area will not be permitted unless it can be demonstrated that the loss or harm achieves substantial public benefits'.

Policy HER DM6 relates to 'Sites of Archaeological Interest' and states *'There will be a presumption in favour of the preservation of scheduled and other nationally important monuments and archaeological remains. Where proposed developments will have either a direct impact on sites listed in Table 16.1 (i.e. developments requiring Scheduled Monument Consent) or where developments will have an indirect impact on the settings of those sites listed in Table 16.1, or where a site on which development is proposed has the potential to include heritage assets with archaeological interest (having consulted the Historic Environment Record) permission will only be granted where it can be demonstrated that development will not be harmful to the archaeological interest of these sites. In all such instances: a. Applicants must arrange for a desk based archaeological assessment of the proposed development site to be undertaken by a suitably qualified person. The archaeological assessment will take the form of a factual review of the known information on historic assets and an appraisal of these assets. This information shall accompany the planning application, and, where not supplied, will be required before any planning application is determined*. Where the Planning Authority has reason to believe, either from the archaeological assessment as above, or from other evidence sources, that significant archaeological remains may exist, further assessment in the form of a field evaluation will be required to be carried out before the planning application is determined. Any field survey undertaken shall be carried out by a professionally qualified archaeological organisation or consultant only. All stages of archaeological fieldwork shall be subject to a Written Scheme of Investigation approved by the local planning authority. No development shall take place on the proposed development site until the applicant, or their agents or successors in title, is in receipt of a Written Scheme of Investigation that has been approved by the Local Planning Authority; or b. A field evaluation as above, which shall include a historic environmental record of the archaeological site without the requirement to undertake a separate desk based archaeological assessment. c. Preservation in situ of archaeological sites or remnants of such sites, is the preferred option. However, where the assessment, which shall be subject to a Written Scheme of Investigation, shows that the preservation of archaeological remains in situ is not justified, conditions may be attached to any permission granted that development will not take place until provision has been made by the developer for a programme of archaeological investigation and recording. Any such programme shall be carried out prior to the commencement of the development. d. Whenever practicable, opportunities should be taken for the enhancement and interpretation of archaeological remains left in situ. Developers shall record any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and possible impact, and to make this evidence (and any archive generated) publicly accessible. e. Where development is to be phased the presumption would normally be that the whole site should be recorded as one project in order to maintain the continuity of the archaeological record. f. Developments shall also be consistent with all other Local Plan Policies.*

** Those submitting planning applications are strongly advised however to undertake a desk based archaeological assessment in advance of a planning application being lodged as, depending on the outcome of this assessment, further assessment in the form of a field evaluation may be required (as outlined in a. above)'.*

Blue Sail Arun District Visitor Strategy (November 2023)

The 'Vision' states: *'The Arun District will become a more connected and coherent destination. It will be a place that makes it easy for visitors to discover and delight in the unique mix of contrasts that typify this corner of Sussex. Through leveraging Arun's most iconic towns, attractions and natural assets, tourism will strengthen local prosperity and social cohesion, support sustainability and enhance the district's reputation as a great place to live and invest in, as well as visit.*

The Arun Economic Development Strategy 2020 – 2025

The Arun Economic Development Strategy 2020 – 2025 sets out the economic priorities of Arun District Council and the opportunities to support the prosperity of the district.

The Vision states: *'Our ambition is for Arun to be a globally-connected business location with thriving towns and villages each with a strong identity, offering affordable, well designed housing, connected by first class transport and digital infrastructure'.*

The strategy focuses on 3 themes:

- Arun: future places - shaping our places: for people to live, work and visit
- Arun: a business success story - attracting investment and success: giving businesses the space and support to grow and prosper
- Arun: prosperous and happy communities - putting people centre stage: supporting our people to live healthy, happy, prosperous lives

In respect of future trends and changing places, the Strategy states: *'Bognor Regis's railway station has been refurbished to provide a creative digital hub to attract vibrant new businesses to the town centre and a place branding initiative will promote all the town has to offer'.*

The Strategy states *'Digital technology will drive huge changes in the ways we work, live and get around'.*

In respect of 'Changing technologies',

'Technological developments are driving changes not just in how we live and communicate or the availability of new products and services but also in the way in which we do business. The UK, and the southeast, is at the forefront of developments in technologies that will provide new economic opportunities .

Digital Enabling Technologies are driving immense changes, for example, robotics, sensors, and human computer interaction, causing new sectors and businesses to develop where others decline. These new technologies have knock-on effects on employment – for example self-service tills are replacing checkouts, with some shops/cafes now staff-free using contactless payments.

5G and next generation communication devices will continue to have far-reaching effects on the speed and the way in which business is done.

Big data: as our use of digital devices has increased rapidly so has the volume and extent of data being collected. Exploitation of big data is already creating new business opportunities from data visualisation to the development of machine learning'.

Government Ambition and Legislative Reforms

It is important to consider this proposal in a wider context of National and Local Government ambition which clearly recognises the benefits that modern communications networks bring.

National

- **Labour Manifesto[8]**

The Manifesto included a section entitled 'Kickstart economic growth' within which the subsection 'Economic Infrastructure' referenced their views on modern communications as follows:

> *"In an ever more connected world, Britain's communication network is also vital. Under the Conservatives, investment in 5G is falling behind other countries and the rollout of gigabit broadband has been slow. Labour will make a renewed push to fulfil the ambition of full gigabit and national 5G coverage by 2030.*

- **UK Wireless Infrastructure Strategy[9]**

The Strategy recognises the benefits that effective connectivity has brought to British households and business by boosting growth, productivity, and opportunity for all. Advanced wireless connectivity is heralded as the foundation on which to build industry, employment, skills and services for the future with 5G identified as being key to driving industry growth and improving public services and transport. Improving digital connectivity is also one of the government's Levelling Up Missions and aims for all places and communities across the UK to share in the benefits of good connectivity, enriching lives and driving local growth.

The document references the Prime Minister's 5 priorities for this government, i.e., to build a better, more secure, more prosperous future for the UK, including growing the economy, and creating better-paid jobs and opportunity right across the country, which this strategy is focused on delivering.

Chapter 5 of the Strategy deals specifically with 'Realising the benefits of 5G and advanced wireless connectivity' and states:

> *"5G and other forms of advanced wireless connectivity pave the way for new services and applications that can have a transformative effect on our public services, businesses and our local economies, delivering this government's priority of growing the economy and creating better paid jobs. Wireless connectivity can support mobile healthcare workers and connected vehicles, improve traffic flow through our cities and enable our factories to be more productive, supporting the fourth industrial revolution. Our evidence is clear that the most significant economic benefits from 5G will come from widespread adoption of advanced 5G by industrial sectors, including manufacturing and logistics, and by public services.*
>
> *The government is determined that the UK should take full advantage of these opportunities…*

[8] https://labour.org.uk/updates/stories/labour-manifesto-2024-sign-up/
[9] https://www.gov.uk/government/publications/uk-wireless-infrastructure-strategy/uk-wireless-infrastructure-strategy

We are therefore providing the framework to ensure that people, businesses and public services across the UK are able realise the full benefits of 5G and advanced wireless connectivity as soon as possible."

With regards to facilitating better connectivity at a local and regional level, Chapter 5 references the need for 'Local Leadership and Coordination' stating:

> *"Local leadership can help to identify and break down barriers to deployment at a local level by bringing together stakeholders across the public sector and building strong relationships with industry. The installation of telecoms infrastructure involves a number of different local government departments (such as planning, estates, highways) and their activities can be siloed and uncoordinated.*
>
> *It is essential that, at a leadership level, local and regional authorities recognise the importance of wireless connectivity and identify decision-makers within the organisation who are empowered to facilitate private sector investment. By articulating the benefits of wireless infrastructure and connectivity and linking these to digital inclusion (and, in turn, tying these into local authorities' wider regeneration and growth or 'place' strategies) it can be viewed as an inward investment opportunity for places across the UK."*

- **Ofcom Connected Nations Report 2025[10]**

The annual Connected Nations report measures progress on the availability of broadband and mobile services across the UK, including the newest full fibre, fixed wireless access and 5G networks now being rolled out.

The Report's section entitled 'Overview' confirms the following in relation to 5G coverage and data use:

- Mobile coverage continues to increase, with UK 5G coverage outside of premises from at least one operator now ranging between 94% and 97%...
- Mobile data use continues to rise, increasing by 18% over the past year...
- 5G traffic saw the largest growth…
- 4G remains the dominant mobile technology…

The Report's section entitled 'Mobile, data and voice' confirms that mobile connectivity plays a vital role in how people across the UK access services, communicate and stay connected and states the following under the subheading 'Highlights':

- ***"5G Standalone (5G SA)** is now available across 83**%** of areas outside of premises in the UK, based on our High Confidence levels. This newer form of 5G is being rolled out alongside existing 5G non-standalone (5G NSA) services.*
- ***Overall 5G coverage, which includes both 5G SA and 5G NSA, continues to expand.** 5G coverage outside of premises from at least one MNO now ranges between 94% and 97%, based on our Very High and High Confidence levels. Individual MNOs report 5G coverage outside of premises of between 64% and 89%, at our High Confidence level.*
- ***4G coverage from at least one MNO now reaches 96% of the UK geographic landmass and extends beyond 99% of UK premises.** 4G continues to carry the largest share of mobile data traffic, accounting for 72% of the total monthly mobile data traffic. While it*

[10] https://www.ofcom.org.uk/phones-and-broadband/coverage-and-speeds/connected-nations-20252

remains the most used mobile technology, its share is gradually declining, down by 6 percentage points from 2024, indicating a shift towards 5G.

- ***Monthly mobile data traffic increased by 18% over the past year to 1,257 petabytes (PB)**, a growth rate broadly consistent with the previous year.*
- ***5G traffic saw the largest growth, rising from 227 PB to 348 PB, an increase of 53%.** Notably, 5G SA now accounts for approximately 31% of total 5G traffic, representing around 9% of overall mobile data traffic. This reflects a widespread transition by MNOs from NSA to SA networks.*
- ***The transition away from older mobile technologies continues.** We expect all MNOs will have completed their 3G switch-off by the end of the year. All MNOs have committed to retiring their 2G networks by 2033 at the latest.*
- ***The number of direct customers relying on 2G or 3G-only devices is approximately 2 million**, broadly similar to the 2.1 million reported in 2024."*

- **UK Digital Strategy Policy Paper[11]**

The UK Government's Policy Paper was updated on 04 October 2022, within which 'Section 1 Digital Foundations' reiterates that digital infrastructure plays a vital role in the daily lives of modern society and is the foundation of a thriving digital economy. The Strategy confirms that every part of the UK needs world-class, secure digital infrastructure that enables people to access the connectivity and services they need, where they live, work or travel, and clearly states the ambition to supply the majority of the UK's population with access to 5G by 2027. The Strategy also highlights the fact that enhancing digital connectivity is 'Mission 4' of the Government's Levelling Up White Paper[12].

- **The Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2022[13]**

The reader will be aware that amended planning legislation was introduced on 04 April 2022 in the form of the above, which saw a relaxing of planning laws to facilitate Government ambition for all to have access to effective and UpToDate mobile communications services in recognition for the benefits that modern communications networks bring.

The 'Explanatory Memorandum' that accompanied this amendment confirms that:

"Permitted development rights have an important role to play in the planning system. They provide a more streamlined planning process with greater planning certainty, while at the same time allowing the local consideration of key planning matters through a light-touch prior approval process.

Policy Background, What is being done and why? Paragraph 7.1

It is essential that the planning system continues to effectively support the deployment of new mobile network infrastructure. The changes will provide Code Operators with flexibility to upgrade existing sites in England for 5G delivery, enhance coverage and meet growing demands for network capacity. They will also reduce the time, cost and uncertainty involved in upgrading mobile network infrastructure and encourage the use of existing infrastructure and promote site sharing to reduce the impacts of new deployment.

Policy Background, What is being done and why? Paragraph 7.3

[11] https://www.gov.uk/government/publications/uks-digital-strategy/uk-digital-strategy
[12] https://www.gov.uk/government/publications/levelling-up-the-united-kingdom
[13] https://www.legislation.gov.uk/uksi/2022/278/contents/made

Article 3(2)(a) of this Order alters the height limits for the deployment of new groundbased masts through permitted development rights. These changes permit the installation of new ground-based masts of up to 30 metres in height on unprotected land, and up to 25 metres on Article 2(3) land.[14] *In both cases Code Operators would need prior approval from the local planning authority. These changes will reduce the number of new ground-based masts needed and will particularly support deployment of the Shared Rural Network, a programme to increase mobile network coverage throughout the UK.*

New ground-based masts, Paragraph 7.16

- **Future Telecoms Infrastructure Review (FITR)**[15]

In 2018, the Department for Digital, Culture, Media and Sport published the FITR, outlining the Government's intent on being the best place to start and grow digital business with the aim of providing the majority of the population with 5G coverage by 2027. The FITR made it clear that 5G networks will deliver faster and better mobile broadband data services to consumers and businesses and will enable innovative new services for industry sectors, including manufacturing, transport, immersive technologies and healthcare.

- **The Electronic Communications Code 2017**[16]

Government ambition and recognition for the benefits that modern communications networks bring is also clearly evident in the publication of this document which has made it easier for network operators to install and maintain apparatus, such as phone masts, exchanges and cabinets, on public and private land with Part 4, Paragraph 20, providing a mechanism for the courts to impose terms of occupation on a landowner and the Operator or infrastructure provider. Further amendments to this Code are imminent, to help streamline the acquisition process and clarify relationships between infrastructure providers and site owners.

Other

- **Times Article, Prime Minister Comments**

On 05 December 2024, the Prime Minister, Sir Keir Starmer, was quoted in an article in The Times, confirming that housing needs to be supported by good infrastructure, stating:

> *"Every road, pylon and mast – which connect people with opportunity – must jump through endless hoops, only to be opposed, dragged out, before eventually, if lucky, approved…"*

- **Department for Science, Innovation & Technology's Minister of State letter to Council Leaders**

On 29 November 2024, the Minister of State, Chris Bryant MP, wrote a letter to Council Leaders, urging support for digital infrastructure deployment and collaboration with mobile network operators, stating:

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

[14] Please note that A1(1)(c) of the GPDO also limits the height of new ground based masts on highways land to 25m
[15] https://www.gov.uk/government/publications/future-telecoms-infrastructure-review
[16] https://www.ofcom.org.uk/phones-telecoms-and-internet/information-for-industry/policy/electronic-comm-code

We need your help to achieve these goals. Broadband and mobile rollout rely heavily on local authorities prioritising digital infrastructure and placing it at the heart of their wider Place strategy. I am writing to you today to highlight a number of areas that remain a challenge, and how they can be approached to boost telecoms investment in your area."

Summary

Each of the above demonstrates the governmental recognition of the increasing importance of reliable connectivity now and in the future and they set the scene in which Decision Makers must determine telecommunications applications, particularly in areas where coverage and capacity issues are being experienced, as is the case in this instance.

It is also clear from the above that the preceding and current UK Governments have both placed an onus on Planning system reform to drive the economy with the 2022 revision to the GPDO having relaxed planning laws and increased permitted development rights in favour of the roll out of digital infrastructure, helping to facilitate access to effective communications networks for all. The 2024 revision to the NPPF then also explicitly references Digital Infrastructure in the chapter related to 'Building a Strong, Competitive, Economy' and one will also note that the publication of the 10 Year Strategy commits to a 'Call for Evidence' on legislation related to streamlining the delivery of digital infrastructure, given the socio-economic benefits attached. The 2025 Resilience Action Plan then also adds further weight to the argument by reiterating that telecommunications are 'Critical National Infrastructure' that is integral to many, if not all, economic sectors. These governmental aspirations are undeniable.

Planning Issues

The main issues arising from this prior approval notification are whether the proposed mast and cabinets due to their siting and appearance would result in harm and if so whether any perceived harm would be less than substantial and would be outweighed by the significant social and economic benefits associated with infilling the gap in coverage for the operators and to allow for the future introduction of 5G provision attributed to the proposal to enable sustainable development and growth across the County and meeting the needs of its communities.

The proposed monopole fully comply with the NPPF, the Adoption Arun Local Plan 2011-2031 (July 2018), as it will increase overall connectivity for this area of Arun. Access to high quality, reliable superfast mobile network is not just a 'nice to have' but an essential part of everyday life. Indeed many, including the former Minister for Digital Infrastructure Matt Warman, consider it to be the fourth utility service as important as gas, water and electricity, a life line for many especially during the COVID 19 pandemic where people were able to see their loved ones, speak to friends and family and arrange virtual meetings allowing some form of normality in a very abnormal situation.

The provisions of the GPDO require the local planning authority to assess the proposed development solely on its **siting and appearance**.

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 again in April 2022, which enables sites such as this one to be built, with prior approval for siting and appearance being the only matters that the local planning authority can take into consideration.

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

'The statutory requirements relating to prior approval are much less prescriptive than those relating to planning applications. This is deliberate, as prior approval is a light-touch process which applies where the principle of the development has already been established (emphasis added). *Where no specific procedure is provided in the General Permitted Development Order, local planning authorities have discretion on what processes they put in place. It is important that a local planning authority does not impose unnecessarily onerous requirements on developers, and does not seek to replicate the planning application system*' (emphasis added).

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

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

Siting

The siting of the proposed radio base station has been carefully considered. To this end, the equipment has been located within the centre of the existing built form of the Haven Holiday Park, to the south west of the main building complex. The undulating terrain in the landscape will ensure that this installation will not be readily visible from public vantage points. The area immediately surrounding the application site is predominately comprises static caravans and commercial uses associated with the holiday park.

The base station will be viewed in the context of the existing large holiday park buildings and the numerous static caravans surrounding the site. There are a number of linear structures within the application site including lighting columns, satellite poles, CCTV poles, and both road and commercial signage, as well as flag poles and telegraph poles and associated overhead lines within the landscape, which will all help the equipment assimilate with its surroundings.

Additionally, the existing building and hedgerow surrounding the site helps to screen the lower section of the mast and the ancillary equipment from the wider area. These features will help the new mast and associated cabinets from appearing prominent in the landscape, as shown within the photomontages. Consequently, the visual impact of the proposed radio base station will be minimised and largely restricted to the immediate vicinity. This is in line with the NPPF, and the aspirations of the Arun Local Plan 2011-2031 (July 2018) policies SD1, D SP1, TEL SP1, TEL DM1, HER SP1 and HER DM6. The operator's equipment cabinets are similar to other statutory undertakers, their limited height and scale will ensure that these cabinets will not be detrimental to the visual amenity of the area and will be finished in fir green to blend in with the existing surrounding vegetation. However, they can be coloured any other colour the LPA consider appropriate if necessary.

As explained throughout this statement, the siting of the equipment has predominantly been guided by technical restrictions to infill the gap in coverage. There is a specific requirement for a new radio base station installation at this location to provide additional coverage and capacity for the operators in the area. The proposal will ensure the area has reliable 2G and 4G provision as new 5G services to allow 5G service provision to the area. Vodafone are limited in siting options as there is a requirement to fill this gap in coverage for this area including Haven Holiday Park and its surrounds.

The applicants have explored the possibility of using existing buildings, and other structures for the proposed installation. In line with the requirements of NPPF, there are no existing telecommunications installations for the operators 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 operators 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.

Also, in accordance with policies SD1, D SP1, TEL SP1, TEL DM1, HER SP1 and HER DM6 of the Local Plan the proposal will provide access to improved high quality digital connectivity services from a range of providers including Vodafone, therefore it will aid in sustaining the local economy. It is sensitively sited within the centre of the existing holiday park and will aid in supporting a thriving and resilient economy as well as improve facilities for local tourism. The proposal will secure the provision of the most-up-to-date communications infrastructure, including future 5G services. The site will maintain the character of the built and natural environment, and landscape setting by its siting within the centre of the holiday park.

The site is not located within a conservation area or any other designated Article 2(3) land. However, it is noted that the site is within the setting of the Beckett's Barn and adjoining earthworks (Scheduled Ancient Monument) and Becket's Barn (Grade II Listed). The site is located within Flood Zone 3 and circa. 90m away from Pagham Harbour (which is a SSSI, Local Nature Reserve, Ramar Site and a Special Protection Area). The proposals will therefore not be detrimental to its setting.

The application is supported by a Flood Risk Assessment. Para. 6.3 states:

> 6.3. The FRA supports the planning application and demonstrates that there is an acceptable level of flood risk to the site if the mitigation strategies recommended are implemented in the scheme. The development does not increase flood risk off site or to the wider area.

Appearance

Freshwave has carefully considered the design of the new structure and are proposing the most sensitive design currently available to provide the necessary infill coverage and capacity to the surrounding area. If the monopole were to be any lower, the antennas would not be able to operate effectively and provide the level of coverage required. As such, this would fail the operators design brief and an additional installation would have to be found, leading to the proliferation of masts contrary to national planning guidance contained in the NPPF.

There are technical reasons for the proposed mast height of 15m. Telecommunications apparatus by their very nature must be taller than surrounding built and natural form to ensure its efficient operation. Radio signals operate like light and must "see" over the target coverage area. The Code of Practice explains this requirement fully in paragraph 39, '*Placing a mast within or adjacent to an existing group of trees, vegetation and other natural features can reduce visual impact… antennas will need to be sufficiently elevated to clear the tree-line…*'. The mast must be able to transmit over the buildings and undulating terrain. Thus, the appearance of the equipment minimises the impact on the visual amenity, and the character and appearance of the surrounding area. This is in full accordance with NPPF and policies SD1, D SP1, TEL SP1, TEL DM1, HER SP1 and HER DM6 of the Local Plan.

The applicant considers the proposal has been designed to have minimal impact on the application site and the surrounding area including the nearby SAM and listed buildings It is within the centre of the holiday park and the height and scale of the development has been kept to the minimum required to provide the level of coverage required. The applicant accepts that the need to attain a high standard of design is relevant and the application proposal has done this while working within very specific technical constraints, to achieve a proposal that would cause limited visual harm to the surrounding environment but that would bring wide ranging and lasting benefits to the community and local

economy at a local level, and as part of a national network. The proposed installation has been sited and designed so as not to create clutter or be detrimental to the visual amenity or character of the area.

The monopole will be galvanised steel (grey), in order to blend with the typically grey British skyline. However, it can be painted any colour, should the Local Planning Authority consider that an alternative colour would be more appropriate.

It is accepted that the height of the proposed installation is taller than other linear structures, such as the lighting columns and telegraph poles, but this in itself is not a valid reason to conclude that it is not appropriate at a specific location. Indeed, Inspectors at appeal have noted that by their very nature to be effective masts are required to be taller than surrounding structures.

There have been numerous appeal decisions where the Inspector has attached significant weight to the benefits, alternative options, technical constraints and NPPF in a balancing exercise of all the valid material considerations, including visual impacts and the impact on residential amenity.

In determining APP/U4610/W/17/3186745 Outside the Painted Lady, Longfellow Road, Church End, Coventry, CV2 5HL the Inspector noted that whilst '*the pole would contrast with its surroundings due to its height, I consider that the harm to the street scene resulting from the development as a whole would not be greater than moderate. Balanced against that harm is the need to boost the capacity of the networks in the area including superfast 4G*'. The Inspector concluded at Paragraph 8 '*I consider the benefits of a high-quality communications network facilitated by the proposed development of the site, outweigh the moderate harm the installation would cause to the appearance of the area.*'

To suggest that it is inappropriate development because it is taller than adjacent lighting columns and signage is no more relevant than suggesting that street lighting columns are inappropriate because they are taller than road signage or traffic lights. They are all essential pieces of infrastructure within a street scene that carry out differing functions and therefore cannot be considered on the same merits. Should a lighting column be capable of the provision of high quality 4G/5G telecommunication services then this would be a reasonable consideration, but this is clearly not the case. As such, the proposal should not be considered negatively due to it being taller per se than other vertical structures. Reasonable consideration of the proposal in the context of the existing built form can only conclude that the presence of other vertical structures in the immediate area only seeks to provide a setting wherein a base station may appear more congruous from which to provide an important service to a wider area.

The proposed height at 15 metres is essential in order to provide infill coverage to the target coverage area of Pagham, Bognor Regis.

This is a prior approval application where the principle of this type of development is already established by the Government under the Town and Country Planning (GPD) Order 2015 (as amended) which states that this type of development is permitted subject to the prior approval of the siting and appearance of the installation. This is therefore akin to an outline planning permission. There is nothing in the legislation which limits the number of installations that can be erected in a certain locality, nor that they cannot be located in commercial or residential areas. Given the nature of the area which contains numerous vertical structures the proposed radio base station would not appear prominent nor out of place.

The design of the radio base station is one of the most sensitive designs available to Freshwave to achieve their brief. This view is supported by photomontages which form part of this application. This is in line with the requirements of NPPF which supports equipment which is sympathetically designed and camouflaged where appropriate [paragraph 119], as well as the aspirations of Policies SD1, D SP1, TEL SP1, TEL DM1, HER SP1 and HER DM6 of the Local Plan.

Lack of Coverage – Material Consideration

In accordance with the NPPF, the proposed installation is significant to enable new coverage for the telecommunication network, ensuring that this area of Pagham, Bognor Regis has the mobile coverage it needs for Vodafone customers. It will also improve coverage for the Mobile Virtual Network Operator's (MVNOs). So, the proposal will not only provide improved and new service provision for both operators 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 proposed installation is significant to enable coverage and capacity within the telecommunication network, ensuring that Pagham, the holiday park, and the wider area continues to get the mobile coverage it needs. 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.

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. Universal accessibility to telecommunications is vital to help overcome isolation or exclusion of rural life. Accelerating the extension of new communications modes should help to avoid new pockets of exclusion developing. The proposed radio base station enhancing existing service provision and providing new 5G technology will support this national guidance.

By providing the latest 4G technology the proposals will also help meet the aspirations of the Blue Sail Arun District Visitor Strategy (November 2023) and The Arun Economic Development Strategy 2020 – 2025 with all businesses, residents and public services all having access to a world class digital infrastructure ensuring sustained economic growth for the area.

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. 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 new radio base station, the operator's customers would experience increasing numbers of dropped calls and buffering unable to access the internet on their handheld devices. In the future 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 aspire to everyone having access to the superfast highway network wherever they are.

The proposed installation will help improve the area's economic prosperity, strengthen the rural economy 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 and the Local Plan. 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 providing high quality 4G service provision to the surrounding area and new coverage into the operators' network, this would fully support the aspirations of the Local Plan.

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 118 that local planning authorities should support the expansion of electronic communications networks. It acknowledges that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being.

The demand for mobile data in the UK is increasing rapidly, and as households and businesses become increasingly reliant on mobile connectivity, the infrastructure must be in place to ensure supply does not become a constraint on future demand.

To emphasis 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 f 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 reliable 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 general mobile technology, such as 5G.

An installation in this location will ensure the lack of 4G high quality service provision is filled and will enable new 5G for Vodafone and MVNOs who buy network space off these operators to ensure 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, the NPPF and the Arun Local Plan.
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 equipment in this area.

The operators not only have a license requirement to provide a certain level of 4G coverage to the population the operators' are 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. There is currently no 5G service provision that is provided by any of the operators in this cell area. The least impact on the surrounding environment in order to provide 2G and 4G service provision, is by installing a new radio base station at the application site.

It is therefore imperative that the operators 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.

Summary

Freshwave on behalf of Vodafone are in the process of identifying a suitable site in the Pagham, Bognor Regis area for a radio base station that will improve service provision for the operators to ensure reliable mobile digital connectivity is provided for residents, businesses and visitors of Pagham.

As part of Vodafone continued network improvement program, there is a specific requirement for a new radio base station installation at this location to provide additional coverage and capacity for the operators in the area. The proposal will ensure the area has reliable 2G and 4G provision as well as new 5G service provision to the area.

Vodafone are limited in siting options as there is a requirement to fill this gap in coverage for this area including Haven Holiday Park and its surrounds. The proposed site will fill this gap in coverage for this busy tourist location.

The development has been significantly reduced from the original scheme, the proposed height at 15 metres is essential in order for the antennas to clear the surrounding buildings and undulating terrain and be able to reach the target coverage area, to provide high quality 2G and 4G service provision to this busy part of Pagham, Bognor Regis. This will fully meet the national Governments aim of '*ensuring that everyone is connected to the information superhighway*' and the national policies set out in the NPPF. If the height of the mast were to be reduced then the antennas would not be able to operate effectively, leading to a degraded service for the operator's customers especially for the higher frequency technologies, including the latest 4G and 5G technology.

It has been shown that the provision of advanced high quality and reliable communications infrastructure is essential for sustainable economic growth and plays a vital role in enhancing the

provision of local community facilities and services in accordance with the Arun Local Plan and the Blue Sail Arun District Visitor Strategy (November 2023) and The Arun Economic Development Strategy 2020

Site selection was progressed in accordance with the applicant's 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 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, the Arun Local Plan and the aspirations of the Blue Sail Arun District Visitor Strategy (November 2023) and The Arun Economic Development Strategy 2020. These benefits are strong material considerations which outweigh any perceived loss of visual amenity to the surrounding area.

Confirmation that submitted drawings have been checked for accuracy

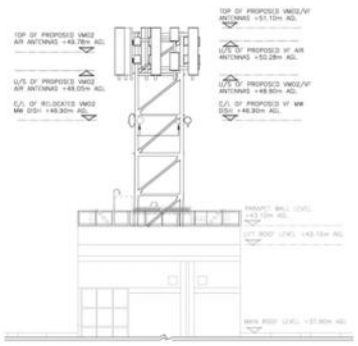
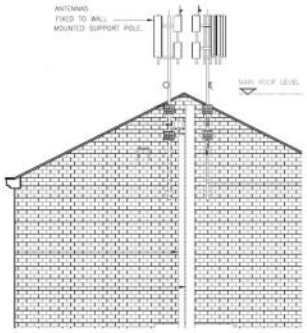
Contact:

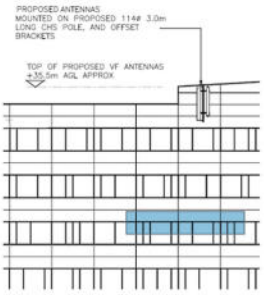
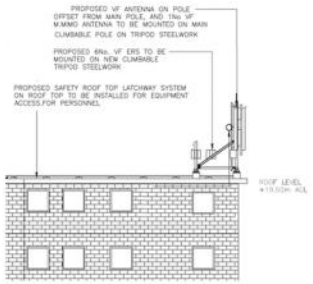
Name: (Agent)	Dianne Perry	Telephone:	[redacted]
Company:	Freshwave Facilities Limited	Fax no:	
Company Address:	50 Cowcross Street London EC1M 3HP	Email Address:	[redacted]
Signed:	[redacted]	Date:	26.03.2026
	Consultant Town Planner	on behalf of Freshwave Facilities Limited	

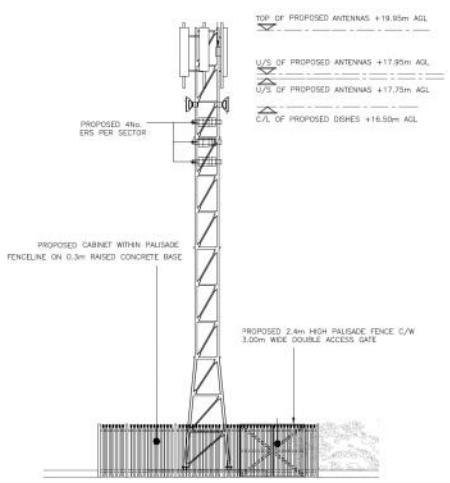
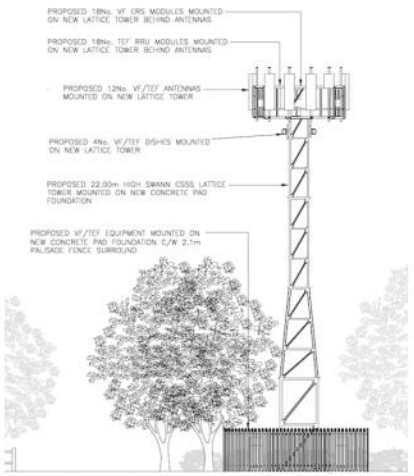
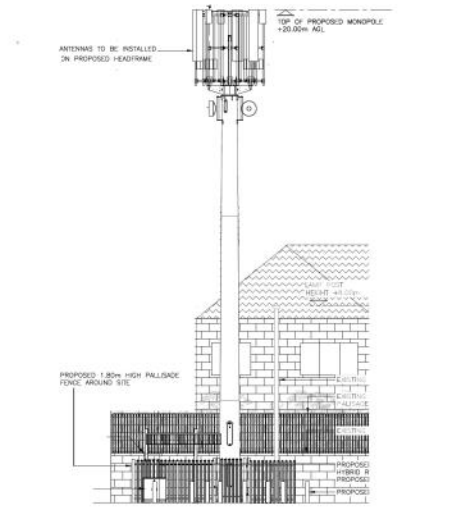
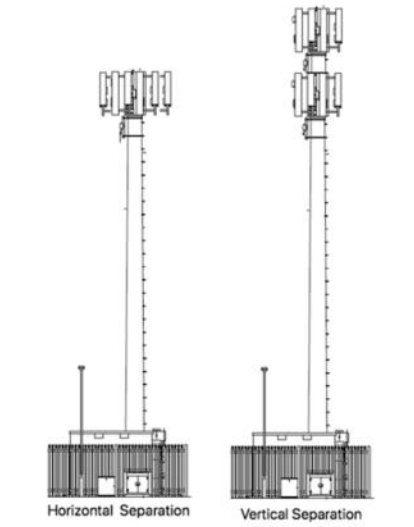
Appendices

Appendix A – Design Options

Appendix A – Design Options

Rooftop Stub Masts 	Due to the weights outlined above and the associated engineering and steelwork required involved, stub mast solutions tend only to be deployed on large buildings with significant structural capabilities, (e.g., multistorey residential tower blocks, car parks, hotels). These masts tend to be set upon a steel grillage base or concrete plinth which further increases the structural demands upon the host building. Please see the design example below for further details as to what a stub mast looks like. As outlined above, a 10m stub mast with headframe including the supporting steel grillage (excluding antennas, RRUs and feeder cables), weighs approximately 4.3tonne. Without the headframe the weight would be circa 2tonnes (excluding antennas, RRUs and feeder cables).
Wall-mounted support poles 	Tend to be deployed on the gable ends of commercial or industrial buildings in the region of 15-20m in height and where sufficient wall space is available. On average, the poles and antennas will need to protrude 4-6m above the roofline to provide sufficient height for the antennas to reach the target coverage area and comply with ICNIRP requirements. However, the actual height requirement is dependent on the height of the host building, the technologies to be deployed and the presence of surrounding buildings and the way they are used, e.g. roof top terraces, balconies, windows etc. In addition, if support poles are not proportionate to the size of the host building, they will look out of place. The host building would have to be of adequate height to secure these poles safely. This type of scheme requires sufficient bracing to account for wind loading, with brackets to be bolted at intervals down the side of the building, through the entire wall and fastened internally via a number of back plates to ensure stability. The support pole needs to be a minimum of equidistant in height above and below the building height to ensure sufficient fixtures can be achieved. The poles also have to protrude above the building and surrounding features to avoid signal clipping and ensure no person can access areas of the host building's roof that may encroach upon the exclusion zone around the antennas that are supported. The internal back plate fixtures have legal implications and would be intrusive for the occupants, both during

	construction and maintenance with the backplates requiring checked at least once a year on routine maintenance visits. Backplates within residential properties is not viable as it would be too intrusive, both during construction and maintenance.
Wall-mounting antennas 	Antennas are fixed to brackets attached to the wall allowing them to sit out approximately 200mm from the building façade and be orientated to best address the operational need, tend only to be used on large buildings in the region of 20-25m in height and in setting where the neighbouring buildings are much lower in height. Antenna locations also need to avoid proximity to windows for ICNIRP reasons with easy access available for a cherry picker for construction and maintenance purposes. The bracketing upon which the antennas are fixed can either be direct to the wall, or they can incorporate a pole allowing for more acute antenna orientation, as per the design example below.
Pole-mounted antennas 	Can be deployed on medium scale, flat roofed, residential, commercial or industrial buildings. Using tripod style structures attached to newly deployed steel grillage, or the existing concrete or steelwork of the host building, the antennas will protrude 4-6m above the host building and are usually located on a central plantroom or close to the edge of the building to avoid signal clipping. The antennas also need to be positioned at a height and location that will ensure no person can access areas of the roof that may encroach upon the exclusion zone around the antennas that are supported.

Monopole or Lattice mast solution	
	
Single operator lattice mast	Shared operator lattice mast
	
Single operator monopole	Shared operator monopole

Freshwave has both single operator and shared, 5G compatible, multi-generational monopole and lattice style mast options within their design portfolio, as per the examples above. These masts are significantly more substantial and structurally robust than street furniture masts, thus they have a wider girth and larger footprint. The headframes on these masts offer operators the ability to orientate or tilt antennas to direct their signal to specific target areas, so their operational potential is much greater. These masts are climbable structures would need to be secured within a fenced compound, usually requiring a 10m x 10m area. Shared monopole masts would need to incorporate either a single wide headframe (left hand side in the above example) or dual stacked headframe (right hand side in the above example) to ensure the necessary separation, (either horizontal or vertical), of each individual operator's transmission equipment. Shared lattice masts would incorporate a wide headframe to ensure the necessary horizontal separation of each individual operator's transmission equipment. Monopole and lattice solutions tend to be deployed in less sensitive urban/suburban areas, for example commercial/industrial estates or recreational grounds. Lattice structures tend also to be preferred to monopole solutions in more rural settings.