SUPPLEMENTARY INFORMATION

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	
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. At the time of making the application, no formal site specific response had been received to pre-application.	

[1] Macro or Micro

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.

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 the application.

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 07.04.25 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:	07.04.25 – 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.

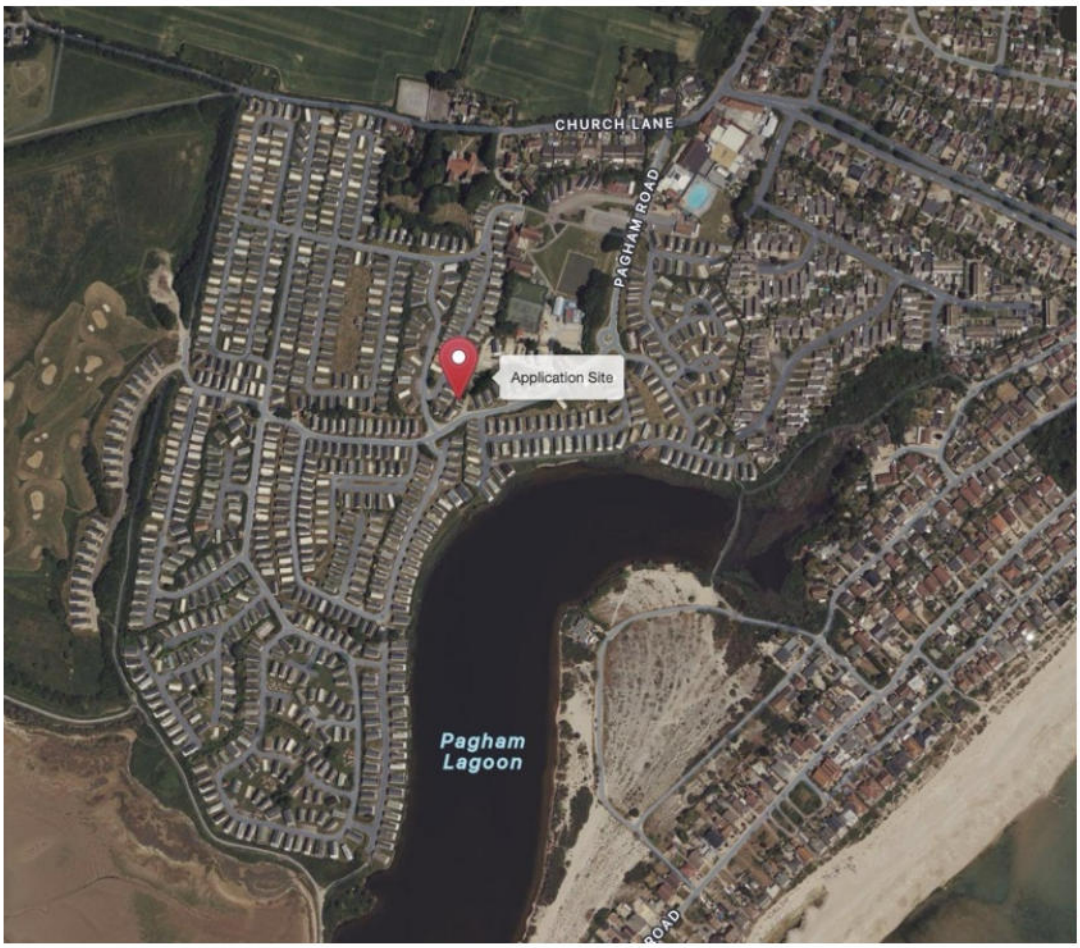


Image 1a: The Application site (Source: Google Maps)



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

The proposal is for the installation of a telecommunications base station comprising a 18m monopole supporting 6 no antennas on a headframe, together with 4 no ground based cabinets and ancillary development thereto including compound fencing.

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.

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): 18m CU Phosco Phase 6 Monopole with headframe*

Description:

The proposed installation of a telecommunications base station comprising a 18m monopole supporting 6 no antennas on a headframe, together with 3 no ground based cabinets, 1 no meter cabinet and ancillary development thereto including compound fencing.

Overall Height:	18.00m (Top height of antennas)
Height of existing building *(where applicable):*	N/A

Equipment Housing: 3 x Cabinet

Length:	TBC
Width:	TBC
Height:	TBC
Equipment Housing: 1 x Meter Cabinet	
Length:	TBC
Width:	TBC
Height:	TBC

Materials *(as applicable)*:	
Tower/mast etc – type of material and external colour:	Steel – Galvanised
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:

Central Government attaches great importance to the design of the built environment and outlines this within Section 12 (Paragraph 131) National Planning Policy Framework (Revised). It states:

'Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities'.

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

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

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

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

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

The proposal is for the installation of a telecommunications base station comprising a 18m monopole supporting 6 no antennas on a headframe, together with 3 no ground based cabinets, 1 no meter cabinet and ancillary development thereto including compound fencing.

The new site is required to fundamentally allow Freshwave on behalf of the operators to provide high quality 2G and 4G services to the surrounding area, as well as providing the latest 5G services.

The response from the Parish Council which states they do not feel the reduction from 23.14m to 18m is sufficient to reduce the impact on the heritage assets and it would be overbearing on the caravans is noted. However, the reduced height at 18m is essential and the absolute minimum height possible to provide infill coverage to the target coverage area. If the monopole were to be any lower, the

antenna would not reach the sufficient area within the coverage area which the operators are required to provide coverage, and this would fail the design brief.

The Code of Practice acknowledges that antennas must be able to 'see' over existing trees and buildings in order to operate effectively. The proposed height of 18 metres is the minimum height required in order for the antennas to operate effectively over the adjacent buildings and undulating landscape.

The antennas are all unshrouded for technical reasons. However, they have been designed to be as tight as possible to the headframe, which is only slightly wider than the main column, to minimise its visual appearance. The higher the radio frequency the more signal attenuation there is. The higher frequency of 4G and 5G antennas are unable to operate effectively through the Glass Reinforced Plastic that a shroud is made up of and as such if these antennas were to be shielded then they would not be able to provide the necessary coverage to the target coverage area. An additional installation would be needed elsewhere within the cell area, leading to the proliferation of masts.

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

The proposed design is more visually sensitive and much easier to assimilate into the landscape than lattice towers with bulky headframes. These traditional designs are preferred by operators as they are structurally capable of hosting more equipment and give greater scope for antenna orientation and are thus more efficient structures. However, such designs would appear alien in this location. Therefore, the operators have compromised on obtaining maximum coverage in order to better assimilate into the site. The nearby similar functional, vertical structures will help the proposed installation assimilate with the surrounding area. The monopole is proposed to 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.

The design of the column represents a simple, functional, vertical structure which will not appear incongruous within the landscape. It resembles as closely as possible the other existing vertical structures within the immediate area including the streetlighting columns, road signage and railway line electric poles. This is demonstrated by the photomontages enclosed with the application.

The proposed equipment cabinets will be located at ground level alongside the proposed monopole, all enclosed within the fenced compound and they will be coloured Fir Green (RAL 6009) to blend with the surrounding vegetation. However, they can be coloured any other colour the LPA consider appropriate if necessary. The cabinets are designed to appear like other statutory undertaker's equipment cabinets. The equipment cabinets can be installed under permitted development rights but have been included on the plans and in the description in order to remain fully transparent.

The site selection was progressed in accordance with the applicant's licence obligation, advice in the NPPF and the Code of Practice, with all discounted sites fully explained within Section 5 of this report, the proposal represents the least visually and environmentally intrusive, technically suitable, available option.

It is therefore considered that the proposal before you strikes a good balance between environmental impact and operational considerations. The proposed height and design represents the best

compromise between the visual impact of the proposal on the site and surrounding area and meeting the technical requirements for the site. Taking all matters into account it is considered that this proposal, will infill coverage where there is currently a gap for both Vodafone, it will provide the capability for coverage from for multiple operators required from a single network installation, it would not appear out of place within the landscape.

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 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	Yes	

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

4. Technical Justification

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

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

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

The National Planning Policy Framework states that local planning authorities should not question the need for the telecommunications system, which the proposed development is to support. However, for the avoidance of doubt as set out below.

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 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 and its wider more remote surrounds.

The area within which an installation needs to be established in order to meet the coverage requirement is constrained by the location and extent of the coverage provided to infill the existing gap, as well as take into consideration the other existing installations in the surrounding area.

Without this new installation, the area will remain to detrimentally affected by the lack of coverage, as the nearby sites continue to try to serve a much larger demand. The result would be a loss of coverage, constant buffering and dropped calls to the surrounding area, to the detriment of locals, businesses and visitors to the area.

Mobile connectivity and service is required where customers live, work and play. 5G coverage and superfast mobile broadband data capacity demand will continue to increase exponentially with the introduction of IoT (Internet of Things), machine to machine connectivity, automated transport/industry and other 'smart' applications. To this end, the existing shared infrastructure within the built environment has had to be reviewed and adapted as appropriate.

5. Site Selection Process

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

In accordance with the licence obligations and advice in the National Planning Policy Framework and the 'Code of Practice for Wireless Network Development in England' the applicant's network rollout team investigated the following siting and design options using this sequential approach to site selection:

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

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,	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

		Bognor Regis, PO21 4NR	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, Bognor Regis, PO21 4NR	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 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, Bognor Regis, PO21 4NR	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.
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'.

UK Wireless Infrastructure Strategy, April 2023

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

*"5G will be the cornerstone of our digital economy. With higher capacity and lower latency, standalone **5G will drive growth** in the industries of today and tomorrow, including in emerging sectors like artificial intelligence where Britain leads the world. Just take smart ports, where 5G-enabled remote*

operation can help us to move containers more quickly, efficiently, and safely, boosting our international competitiveness. ***5G can improve our public services,*** *too, in everything from education to social care. In transport, for example, we can use 5G to power forward progress in everything from real time travel information to augmented reality navigation and self-driving buses and taxis…. This is an incredible opportunity; widespread adoption of* ***5G could see £159 billion in productivity*** *benefits by 2035".*

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

> *"The next decade will see seismic changes both in terms of what wireless connectivity can deliver and how we can use it. The economic and social benefits from these changes promise to be vast, from supercharging growth to accelerating our transition to net zero. But these benefits can only be achieved with concerted action from government, industry, and others".*

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

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

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

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

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

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

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

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

Connected Nations Report 2022

The Connected Nations Report 2022 was published in December 2022. The report confirms in line with the UK Wireless Infrastructure Strategy (April 2023) in respect of delivering a basic 5G signal for the majority of the population by 2027, 5 years early that 5G rollout is expanding, stating:

"5G rollout is expanding EE, Virgin Media O2, Three and Vodafone have continued to extend their 5G networks across the UK, and we are reporting individual mobile network operator (MNO) coverage for the first time, based on the High to Very High Confidence range which we established in 2021. These ranges cover an increasing probability that the coverage predicted by MNOs will translate into coverage on the ground. As noted above, the level of coverage provided outside of premises by at least one mobile network operator across this range is now at 67-77% (up from 42-57% last year). The coverage provided outside of premises from individual MNOs ranges from 39-58% at High Confidence, with a range of 31-45% at our Very High Confidence level. Though most 5G sites are focused around busy urban areas - providing additional capacity to existing mobile data services - we're now seeing coverage extending into smaller towns and other high footfall locations. The distribution of this investment remains broadly similar to last year, with 86% of sites in England, 8% in Scotland, 4% in Wales and 2% in Northern Ireland".

Connected Nations Report 2023

The Connected Nations 2023 was published in May 2023. This is the first interim update to their Connected Nations 2022 report. It is based on mobile coverage and fixed broadband availability across the UK as of January 2023. Ofcom is a measure mobile coverage in a way that reflects the likely experience of people using their mobile phones. The report acknowledges that there has not been a significant increase in coverage since the December 2022, but the industry continues to develop its coverage footprint.

"4G: Coverage of 4G mobile networks across the UK has not seen significant changes over the last reporting periods. Around 92% of the UK landmass is predicted to have good outdoor 4G coverage from at least one operator, and this area includes nearly all of the premises in the UK. This is expected to rise to 95% by end of 2025 as a result of the SRN.

4G not-spots: The UK has both geographic and road not-spots (that is, areas where good 4G services are not available from any mobile operator). Geographic not-spots have remained the same since our December 2022 report at 8%. Road coverage remains largely the same with just 4% of all roads estimated to be an in-vehicle not-spot. This varies significantly across individual nations, particularly in Scotland and also in Wales. Wales has benefited by a percentage point drop in geographic notspots since our December report, which we attribute to the SRN scheme.

Calls and text coverage: As with 4G, predicted coverage for calls and text services remains largely unchanged over the previous reporting periods. The range of predicted coverage by MNOs varies from 85-93% of the UK landmass, depending upon operator. In addition, 99% of all UK premises are predicted to have coverage for outdoor voice calls from all MNOs.

Calls/text not-spots: Areas where people are unable to make a call or send a text from any operator (not-spots) is similarly unchanged, with around 4% of the UK geography estimated as a not-spot, and around 2% of the UK's roads estimated to be a not-spot for calls and texts made or received in vehicle. As with 4G, there are marked variations for individual nations; for example, geographic notspots across Scotland remain higher than for the rest of the UK, at around 10%.

5G: We continue to report on 5G coverage (outdoors premises) from 'All MNOs' and from 'At least one MNO', with coverage confidence levels ranging from high to very high. Coverage from 'At least one MNO' now ranges from 73% (very high confidence) to 82% (high confidence) of premises outdoors, up from 67% and 78% respectively when we reported in our December 2022 report".

Connected Nations update: Spring 2024

Ofcom produced an interim Connected Nations report in April 2024, which is based on data collected in September 2023. The report is based on fixed broadband availability and mobile coverage in the UK as of January 2024.

The summary of key findings states:

- *Mobile coverage remains stable for 4G, with around 93% of the UK landmass predicted to have good outdoor 4G coverage from at least one operator. This area includes nearly all the premises in the UK.*
- *5G coverage has also remained steady over the previous 4 months with around 92% of premises being able to get a 5G signal outdoors, from at least one mobile network operator (figures reported with a high degree of confidence).*

It is therefore clear that more infrastructure is needed to ensure that local residents and businesses in Arun have a choice for which network to choose for mobile services. The proposed installation will allow Vodafone provide the latest, high quality 4G coverage to this area, as well as providing new 5G service, thus increasing the choice of network for those living and working in the area.

Connected Nations UK Report 2024

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

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

In relation to 4G technology, the report states:

"4G remains the primary technology for mobile users, reaching outside more than 99% of UK premises and carries 78% of total mobile traffic data. 4G coverage where it is available from at least one MNO has now reached 95% of the UK landmass (delivering early on one of the key targets for the Shared Rural Network programme), with 4G geographic coverage across individual MNOs in the UK rising from a range of 80-87% last year to 88-89% this year. We note the 4G geographic improvements because of the Shared Rural Network programme."

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

Online Nation 2022 Report

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

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

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

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

The Report goes on to states that:

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

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

Sir Chris Bryant's (DSIT) letter to Leaders of the Councils confirms:

"Whilst we recognise the need to fully scrutinise planning applications [for telecommunications development], I ask for you to support the deployment of this infrastructure ***wherever possible".***

Kier Starmer has stated *'We will launch a golden era of building'* confirming *'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'.*

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

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

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

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 and associated headframe supporting the antennas 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 18m. 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 18 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 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.

In line with guidance contained within the NPPF, Local Plan, a new radio base station in this location will enable fast, reliable, secure internet accessibility wherever the user is located. It would fully meet the latest operators' coverage and capacity requirements for 4G and 5G. This would be wholly in line with the Government's latest aspirations to strongly support advanced, high quality and reliable communications infrastructure, essential for economic growth and social well-being. Where the NPPF notes that decisions should support the expansion of electronic communications networks. An installation outside this search area, regardless of whether there are existing sites, would not allow the operators to provide their desired level of coverage and therefore would not adequately provide the required coverage and capacity.

As part of the operators 4G licence obligations, many customers will benefit significantly from a vastly improved service provision in this locality. They will be able to gain access to the very latest technologies and connectivity, to high speed data services. The importance of which is fully highlighted in the Local Plan.

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

The Code of Best Practice acknowledges that there will be times when there is a need for a new radio base station, where sites have been lost, where areas have limited or no coverage and where

coverage and capacity need to be enhanced. This application is one such example where there is a need to provide service provision within this area. Currently there is no/little 4G coverage in this part of Arun for Vodafone.

In the Code of Practice it acknowledges *'the pressure on networks to upgrade and improve networks through changes to existing sites and the development of new sites is constant. With the increasing consumer demand and the Government's ambitious aspirations it is becoming more important to improve connectivity and capacity. This is due to the ever increasing demand for data hungry applications to be available to a range of connected devices, such as smartphones and tablet computers. However, The Code notes that upgrading and improving mobile networks will not be possible without the necessary infrastructure on which they rely'*. Therefore, there is a significant need to locate the 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.

Economic and Social Benefits

The NPPF strongly supports sustainable development as does the Arun Local Plan and the Blue Sail Arun District Visitor Strategy (November 2023) and The Arun Economic Development Strategy 2020. Mobile communication plays a significant role in sustainable development, being able to access the internet via a mobile device allows people to access a wide range of central and local government services buy groceries, manage finances, apply for jobs/university, and carry out school projects, send emails, download applications, send and receive instant messages, participate in social media, streaming and downloading data to name just a few of the benefits of being able to use an internet enabled handheld device. It also allows people to work from home or on the move without needing to return to the office. Residents and businesses will enjoy better accessibility, assisting home-base working by improving the electronic means of communication and the roll-out of high-speed broadband helping to promote live-work development. This reduces travel time, carbon emissions and increases the speed in which information is processed/shared. The proposals therefore fully comply with NPPF to minimise the effects of climate change reducing the need to travel and therefore the carbon footprint.

In such instances, as described above, the NPPF supports development that improves the economic, social and environmental conditions in the area. Providing 2G and 4G coverage and capacity in this area will fully meet this national policy objective. This will continue to transform the digital connectivity in Arun to drive economic growth and innovation.

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

The 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.

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

Paragraph 38 of the NPPF states that:

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

Providing improved 4G coverage and capacity in this area will fully meet paragraph 38 of the NPPF. The Framework also supports strengthening digital and data infrastructure (including 5G), and using data to help address challenges.

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

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

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

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

The Government recognises that widespread coverage of mobile connectivity is essential for people and businesses. People expect to be connected where they live, work, visit and travel. That is why the Government is committed to extending mobile geographical coverage further across the UK, with continuous mobile connectivity provided to all major roads and to being a world leader in 5G. This will allow everyone in the country to benefit from the economic advantages of widespread mobile coverage. As well as improved mobile signal, 5G networks are also crucial to drive productivity and growth across the sectors that local areas are focusing on through their emerging Local Industrial Strategies. Enabling and planning for 5G implementation is central to achieving the Government's objective to deliver property at the local level and enable all places to share in the proceeds of growth.

The Government is determined to ensure the UK receives the coverage and connectivity it needs. To this end, the Government wants to be a world leader in 5G, the next generation of wireless connectivity, and for communities to benefit from the investments in the new technology.

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

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

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

A National Needs Assessment – A Vision for UK Infrastructure was also published in October 2016 (https://www.ice.org.uk/getattachment/media-and-policy/policy/national-needs-assessment-a-vision-for-uk-infrastr/National-Needs-Assessment-PDF-(1).pdf.aspx). It sets out the infrastructure needs for the UK which includes the importance of digital technology. An extract of this assessment can be found below:

> *'A lack of digital connectivity has a detrimental effect on business operations, productivity and output and hence competitiveness in the global market place. Securing digital connectivity is thus critical to the UK's long term prosperity. A key challenge for the digital sector is a persistent digital divide between those who have access to the latest technologies and those who do not, with resulting social and economic exclusion, particularly as dependence on e-services and digital communications increases'*

The Assessment goes on to note that '*Universal digital connectivity would serve as an equaliser of economic opportunity in that it enables participation in a modern digital economy*'. Therefore, this Needs Assessment further explains the consequences of a lack of coverage and the effects this has on social and economic prosperity. This clearly highlights the importance of enhancing high quality 4G coverage and capacity in this part of Pagham, where the social and economic benefits will outweigh the environmental considerations.

The Government's continued strong support for connectivity is further evidenced by the DCMS who launched their UK wide Digital Connectivity Portal on 20 December 2018. The Digital connectivity portal provides guidance for local authorities and network providers on improving connectivity in local areas. The Government wants everyone in the UK to benefit from world-class connectivity no matter where they live, work or travel. The Future Telecommunications Infrastructure Review outlines a package of measures to create the right market and policy conditions to deliver world-class connectivity for citizens

and businesses. As a result, the pressure to provide a new radio base station in this part of Pagham to provide enhanced 2G and 4G as well as new 5G services is significant.

On the 23 September 2020, the former Digital Infrastructure Minister Matt Warman MP spoke about the ongoing work by the Government and telecoms industry to boost the UK's world class digital connectivity in his keynote speech at Connected Britain 2020[2]

> *…'I'd like to take this opportunity to thank everyone in the industry for their tireless efforts at keeping us all connected through an unprecedented period of disruption.*
>
> *…COVID has altered the way we live, work and most importantly, stay connected with our family and friends. The digital infrastructure that keeps us all connected was essential to our daily way of life under lockdown – and is now more important than ever as we head into recovery. Many of these changes – such as increased working from home – will stay with us for the foreseeable future.*
>
> *People have referred to the internet as "the fourth utility" – and it's true. For countless people across the country, having fast and reliable broadband and a good mobile connection is as essential and vital to our daily lives as gas, water and electricity.*
>
> *That's why I'm committed to working with you to ensure the entire nation has access to world-class, next generation gigabit connectivity that is secure and resilient enough to deal with all sorts of future challenges.*
>
> *This Government is ambitious for the UK's digital infrastructure.*
>
> *And because we know that more citizens are increasingly living their lives online, we will be one of the earliest adopters of 5G coverage, with the majority of the population able to access 5G by 2027.*
>
> *...We know how important local authorities are to the delivery of digital infrastructure, which is why I have written to them, together with the Local Government Minister, to outline how they can work more effectively with the industry…*
>
> ….Turning to 5G, while the commercial rollout of 5G continues at pace, we're pushing ahead with plans to make sure all sorts of industries benefit from this game-changing technology.
>
> ….since the start of the 5G Testbeds and trials programme, we've now funded 24 5G testbeds across the UK. Between them, those testbeds have trialled almost 70 different 5G technologies, products and applications. And more importantly than ever, we are investing in a range of sectors to foster, build and grow 5G cross wider industry...
>
> …The world is in the middle of a digital revolution. COVID has accelerated this process, digitising almost every part of our everyday lives and making the infrastructure that connects us more important than ever. That's why it is at the top of the government's agenda…

This Keynote Speech by Matt Warman MP highlights the importance that Government places on 5G and advanced, reliable, high quality 5G technology. To prevent this technology from being brought into the area would be contrary to the Government's key aims.

[2] https://www.gov.uk/government/speeches/matt-warmans-keynote-speech-at-connected-britain-2020?utm_source=01ad07cc-6884-4d9b-a0ca-8c212f0a4289&utm_medium=email&utm_campaign=govuk-notifications&utm_content=immediate

On the 1 October 2020, as part of the Speed up Britain Campaign, The Centre of Policy Studies Report published '*Upwardly Mobile: How the UK can gain the full benefits of the 5G revolution*'[3]. The report identifies what the 5G opportunities are and what the Government needs to do so we can all benefit from this vital new technology. It states that delays to the rollout of 5G could cost the country tens of billions of pounds in lost economic output. The former Government advisers Alex Jackman and Nick King argue that Government's 'levelling up' agenda and the UK's recovery from the COVID-19 pandemic is at risk without a faster 5G rollout – to the tune of £41 billion.

The report highlights that if delays continue at their current rate, by 2027, over 11 million households and businesses could be missing out on vital digital connectivity. Improving digital infrastructure supports the Government's 'levelling up' agenda, by helping local areas to retain and attract businesses and talent as well as by reducing regional inequalities.

The report states that '*the UK must have a functioning network to now support the recovery from the pandemic, empowering businesses and communities with wider coverage, and preparing the ground for the services that 5G can provide*'.

Using analysis by the independent consultancy Policy Points, the report estimates that if 5G coverage reaches a quarter more of the population than the Government's current target of 51%, it will produce GDP gains of £41.7 billion by 2027. It highlights that the difference between the UK being a leader and a laggard in 5G adoption could be as much as £173 billion in incremental GDP over the coming decade, as estimated by the Future Communications Challenge Group.

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

Digital networks and services have underpinned our resilience to the COVID-19 pandemic and they will drive our recovery. By expanding them, we deliver not only immediate benefits but also the essential foundation stone for future prosperity.

The report highlights that while 5G promises to create economic benefits through increased capacity, reliability and speed – vastly improving business productivity and removing barriers imposed by poor digital connectivity – the system is plagued by red tape.

The report acknowledges that the gains are not just at national level. A more extensive digital infrastructure helps local areas to attract and retain businesses and talent, thereby playing a vital role in reducing regional inequalities. Providing a supportive environment for digital infrastructure is one of the few things the Government can do that costs little, boosts growth and helps level up the UK….the key is speed. **The faster a network is built, the bigger the regional gains** (emphasis added). The telecommunications industry faces challenges on this front. The COVID-19 pandemic has increased demand on networks but delayed the availability of new spectrum to provide additional capacity.

The report notes that the reliability and reach of 4G is more important than ever. It is needed both to quench immediate demand, and also to facilitate future 5G rollout, as the underlying passive infrastructure will initially support both technologies. Every failure to provide better coverage not only presents an immediate opportunity loss for local business and consumers but also has a bigger downstream economic impact. It acknowledges that productivity gains to business, equality gains for regions and economic gains for the country are only as achievable as the networks they can access.

[3] https://www.cps.org.uk/research/upwardly-mobile

The report recommended that the Government should reform the strategic planning framework to compel local authorities to ensure that the needs of future mobile connectivity are adequately addressed in Local Plans and that new developments are assessed on how they might impact, or could support, local connectivity.

The Government's ambition for the majority of the UK population to have access to 5G signal by 2027 was repeated in the letter to all the Councils chief Execs and Chief Planning Officers from the Minister for Digital Infrastructure Matt Warman. This letter also acknowledged that the demand for data is increasing rapidly and the COVID-19 pandemic has highlighted how important it is that we all have access to reliable, high quality mobile connectivity to stay connected and for businesses to grow.

The proposed installation in this location will allow the operators to provide high quality 2G and 4G coverage and capacity supporting the Government's aim of '*focusing on ensuring that everyone is connected to the information superhighway*'. This fully meets the aspirations of the NPPF, and the Arun Local Plan.

An installation in this location providing 4G will ensure that the expansion of the electronic communications network is facilitated, and that high quality communications infrastructure is provided to the immediate area.

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

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