

**SITE SUPPLEMENTARY INFORMATION**

1. Site Details

Site Name	Horndean Football Club	Site Address	Land at Horndean Football Club, Five Heads Road, Horndean, PO8 9NU
NGR	470018, 113535		
Site Ref Number	GBR-HAM0006	Site Type <sup>1</sup>	Macro

2. Pre- Application Check List

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

(would not generally apply to upgrades/alterations to existing sites)

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	<b>No</b>
If no explain why: No register exists.		
Were industry site databases checked for suitable sites by the operator:	<b>Yes</b>	No
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: N/A	

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<sup>1</sup> Macro or micro

## Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	<b>Green</b>
Outline Consultation carried out: In accordance with the Code of Practice for Wireless Network Development in England this site has been given a rating of Green. To assist in informing local communities of our proposed development, the Ward Councillor for the Horndean Murray Ward, Councillor Elaine Woodward, was sent information regarding the proposal, by email, on 5 February 2024.			
Summary of outcome/Main issues raised: No response has been received.			

## School/College

Location of site in relation to school/college: The site is located close to Horndean Technology College, Barton Cross, Horndean.	
Outline of consultation carried out with school/college: A pre-application consultation letter was sent to the College, by email, on 5 February 2024.	
Summary of outcome/Main issues raised: No response has been received.	

## **Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation (only required for an application for prior approval)**

Will the structure be within 3km of an aerodrome or airfield?	Yes	<b>No</b>
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	<b>No</b>
Details of response: N/A		

## Developer's Notice

Copy of Developer's Notice enclosed	<b>Yes</b>	No
Date served:	22 <sup>nd</sup> , 23 <sup>rd</sup> & 26 <sup>th</sup> February 2024	

### 3. Proposed Development

The proposed site:

#### **About Icon Tower Infrastructure Ltd (Icon Tower)**

Icon Tower is a UK based company who provide independent wireless infrastructure sites and equipment, and also benefit from being an Electronic Communications Code ('Code') Operator. It develops infrastructure for all networks to use on an open and non-discriminatory basis. Icon Tower is backed by infrastructure investors and has major plans to invest in digital infrastructure to improve mobile and wireless connectivity in both urban and rural areas. On this basis it provides local communities with the most efficient means to improve connectivity whilst minimising duplicative infrastructure deployments in the future. Icon Tower expects that other mobile operators, rural wireless broadband and other essential networks may also use the mast.

Icon Tower does not operate a retail mobile network of its own and instead gathers Lease Premiums to develop its portfolio of infrastructure for the sole purpose of providing access to all wireless network operators on a shared basis. This is undertaken by Icon Tower Ltd's parent company, AP Wireless. AP Wireless' Investment Portfolio comprises thousands of sites across Europe, Asia, Australia and North and South America.

The four MNOs in the UK (Vodafone, VMO2, EE and H3G), together with over 100 other smaller networks, use Icon Tower infrastructure to deliver a wide variety of services ranging 2G, 3G, 4G and 5G mobile through to fixed wireless broadband, emergency radio services, broadcast and local wireless services.

Icon Tower is committed to the responsible development of wireless infrastructure. Alternative locations are assessed based on strict Town Planning criteria (visual amenity, impact on the local community), balanced against the physical requirements of the mast (radio plan coverage, backhaul line of sight, power and site access). We operate in accordance with the Code of Practice for Wireless Network Development in England (March 2022).

International consultancy Ernst & Young highlighted in a recent report that the independent sector *"can play a valuable role in promoting effective infrastructure use – enabling lower costs, increased coverage for remote areas, and increased retail competition for mobile services"*. Ernst & Young further noted that the sector has *"a proven track-record in sharing towers with multiple network operators"* and referenced evidence that independent towers enable 2-3x more connectivity than towers deployed by traditional network operators. (Report on the economic contribution of the European tower sector, March 2015).

Supporting this application will therefore not only secure investment in a high-quality infrastructure asset for the community but also ensure that the mast is deployed by a Code Operator focussed on maximising the use of that infrastructure to enable ongoing improvements to connectivity over the long term.

## Description of the Site

The proposed site is located at land at Horndean Football Club, close to the access to the site, to the west of Five Heads Road, where access to the site would be taken. It comprises a large sports field, including both a formal football pitch, with associated floodlighting, and more informal grassed areas. The area is suburban in character, and the football club site is surrounded by residential properties to the north, east and south. To the west are further playing fields, which belong to Horndean Technology College. Along the Five Heads Road frontage to the site, and between the site and the formal football pitch to the west, there are substantial trees, which would provide a significant level of screening to the proposed development.

There are two existing telecommunications sites close to this proposed new development. These consist of towers on the western side of the formal football pitch. Due to the presence of these existing installations the principle of telecommunications development has already been established in the area.

A photograph of the site is included below:



The location of the existing installations on the football club site is shown below, along with the application site:



### Proposed Development

The installation of a new sharable 25.0 metre high lattice tower which is co-located with an existing compound approximately 95m to the north-west of the site. The development will include a lattice tower, and this is proposed to support 12 no. antennas on two headframes at the top of the tower, along with 6 no. transmission dishes. At the base of the tower 6 no. equipment cabinets are proposed. The equipment is proposed to be surrounded by a 2.4 metre high palisade fence. This development is proposed to facilitate enhanced network coverage for the Mobile Network Operators in the area. This multi-user structure with a secure compound and upgraded power supply will enable a consolidation of equipment and, in time, lead to the removal of unused infrastructure from the wider site and cell area.

**For clarification, the base station would not be built until there is a specific requirement from an MNO (a mobile network operator) and they are on board with the development.** Any redundant equipment would then be removed in line with the requirements of the Electronic Communications Code and the Code of Practice for Wireless Network Development in England. Therefore, there will be no net additions in the number of base stations going forward, and potentially a reduction in overall numbers.

Type of Structure:	Lattice tower
Description:	The installation of a 25 metre high lattice tower supporting 12 no. antennas and 6 no. transmission dishes, the installation of 6 no. equipment cabinets, a 2.4 metre high palisade fence and ancillary development thereto.
Overall Height:	25 metres
Height of existing building (where applicable)	N/A
Equipment Housings:	6no. cabinets form part of this proposal at the base of the tower.
Equipment Housing finish:	Light grey - RAL7035 (Can be changed to alternative colour on request by LPA).
Column/mast etc:	Steel with a galvanised finish.
Fencing	2.4m high fencing fir green finish (RAL6009) - alternative RAL colours can be sought on request of LPA.

### Reasons for choice of design:

In designing the proposed scheme, the applicant has sought to achieve a balance between technical requirements and minimising environmental impact as far as was practicable. It, however, must be acknowledged that technical constraints heavily influenced the design and limited the scope to alter the appearance of the site to a significant degree.

There are three main elements to a radio base station; the cabin or cabinets which contain the equipment used to generate the radio signals, the supporting structure that holds the antennas in the air or fixes them to a building or structure and the antennas themselves, which emit the radio signals (along with any necessary amplifier or receiver units). Other elements necessary for the base station to function are the power source (meter cabinet or generator where a REC supply cannot be utilised), feeder cables that link the equipment housing to the antennas and the various support structures, grillages and fixings, often referred to in general terms as "development ancillary to" the base station. In all aspects of the design now put forward the smallest practical components have been utilised to ensure that the visual impact of the development is kept to the absolute minimum.

The proposed development has been sited and designed following advice contained within the Code of Practice for Wireless Network Development in England (2022). Advice within the document includes:

- *Placing the mast near similar structures. For example, industrial and commercial premises, road signs and lamp posts;*
- *Placing a mast within or adjacent to an existing group of trees*
- *Using simple and unfussy designs. Masts which have complex designs are more likely to dominate and be in discord with the landscape and have adverse visual impacts; and*
- *Appropriate colouring. Masts seen against the sky, for example, are best left in their galvanised state or painted pale grey.*

It is therefore deemed that this proposal follows the national guidance:

- The proposed mast is the lowest height in which the Operators can continue to provide the required level of coverage to the target area, bearing in mind the substantial trees around the site. It is considered that a lattice is best suited to this particular site. It would allow site sharing by more than one user and would be well-screened by trees around the site.
- The proposed mast is proposed to remain galvanised in order to benefit from the typical sky colour in the UK, however if considered more appropriate, this element of the scheme can be amended. For example, the tower could be painted green to take into account its siting close to trees.

For the base station to effectively provide coverage to the target area in line with the established network pattern, specific antenna orientations and heights, determined by Network Radio Planners, must be achieved. The mast height is determined by features of the surrounding area such as existing buildings and trees, the antenna must be able to 'see over' any obstructions in order that they do not block the signals from the antennas, in this case the substantial trees around the site. To achieve operator's upgrade requirements the maximum height of the proposed antennae required on the tower will be 25 metres. The height is determined by the technological requirements by the Operator, in order to provide the reliable signal with greater capacity, reliability and lower latency. The antennae are to be finished in the standard light grey finish, which matches the existing antennae on the installation and help reduce prominence when viewed against the sky.

The proposal is to locate the lattice close to two existing installations. This will help reduce the proliferation of masts in the environment, and therefore will have less adverse visual impact on the surrounding area. It is re-iterated that the site would only be installed once an operator was on board, and this would then allow the existing redundant equipment to be removed.

It is, therefore, considered that the proposal strikes a good balance between environmental impact and operational considerations. The proposed height and design represent the best compromise between the visual impact of the proposal on the surrounding area and meeting the technical requirements for the site to deliver the capability for an enhanced service for multiple operators from a single network installation.

Overall, it is considered that the design is appropriate to the site and surrounding area and avoids any unacceptable level of impact to visual or residential amenity. The minimal impact would be outweighed by the significant public benefits of the proposal.

4. Technical Information

<p>International Commission on Non-Ionizing Radiation Protection Declaration attached (see below) *.</p> <p>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.</p> <p>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.</p>	<p>Yes</p>
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5. Technical Justification

**Enclose predictive coverage plots if appropriate e.g. to show coverage improvement.**

<p>Reason(s) why site required e.g. coverage, upgrade, capacity:</p> <p>The site is proposed as an option for the existing operators close to the site to utilise for upgrades, to provide enhanced services to users in the area, in terms of both coverage and capacity. It would allow for improved connectivity and the provision of the latest technology to the area in the form of 5G coverage. The site would also allow for supporting future innovations in telecommunication equipment. As previously noted, should an existing user close to the site relocate to the new tower, the existing installation would then be removed, ensuring there are no additional installations in the area.</p> <p>Further detail regarding Icon and its proposal, in the Icon Tower – An Introduction for LPA’s document, included with the application documents.</p> <p>The first generation of services provided voice calls, the second generation (2G) allowed basic data such as texting and the third generation (3G) offered internet access and the development of apps. Since then, the smart phone has developed further, and the fourth generation has brought video and much faster data speeds allowing the integration of the smart phone into wider use.</p> <p>The next generation of mobile telephony is 5G which brings greatly increasing data speeds. The advantages this presents range from near-instant downloads of HD films to connected cars, smart medical devices and smart cities. To bring this new technology there will need to be a mix of upgrades to existing sites and the building of new sites. New sites will be needed for many reasons, including that the higher radio frequencies used for 5G do not travel as far as those frequencies currently in use leaving gaps in the network.</p> <p>Although 5G will undoubtedly bring new opportunities and huge benefits to society, we cannot escape from the requirement that new structures, antennas and ancillary equipment will be needed. It has been acknowledged by Government that we must ensure that we have the infrastructure in place to deliver 5G across our major centres and transport networks. This is one of the many additional installations that can assist in providing enhanced services.</p>
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The higher frequencies that 5G will use can provide more bandwidth and thus greater capacity but the signal will not travel as far as those of previous generations. The implications to the built environment will be that more infrastructure needs to be deployed, as in this case.

5G is the next generation of mobile internet connectivity, offering faster speeds and more reliable connections on smartphones and other devices than ever before. Compared to even the most recent and efficient generation of mobile network, 4G, 5G is set to be far faster and more reliable, with even greater capacity and lower response times.

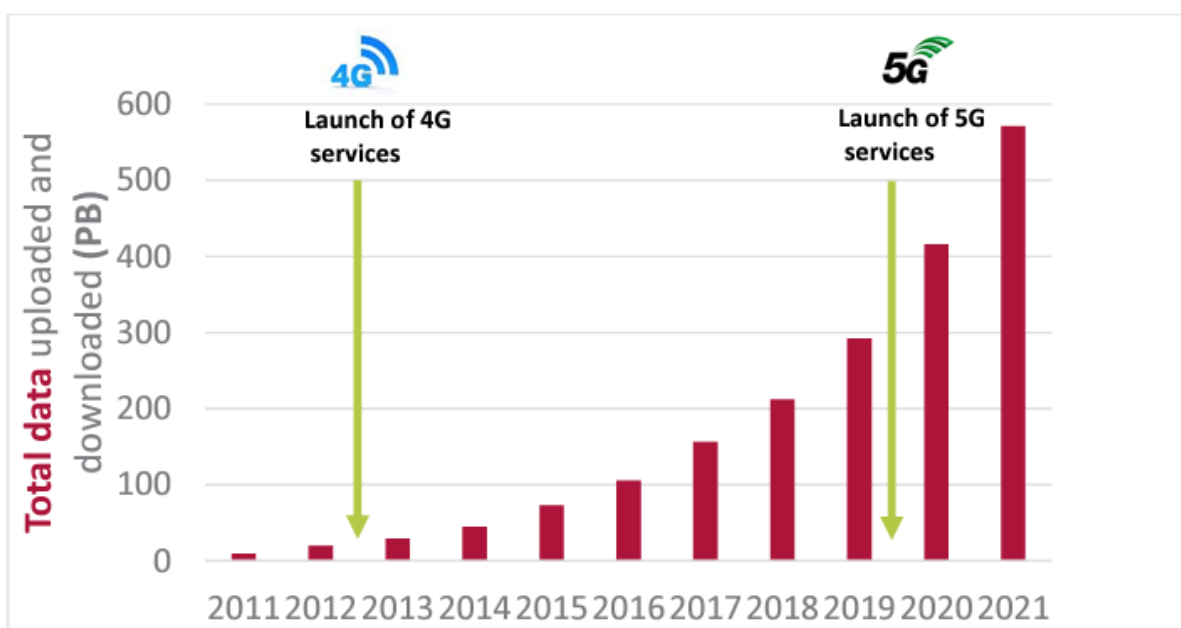
There has been an increased demand for mobile services, and this is forecast to continue. A publication from OFCOM in 2022 illustrated the increasing demand for services. A discussion paper entitled "Mobile networks and spectrum - Meeting future demand for mobile data" (full report at [https://www.ofcom.org.uk/data/assets/pdf\\_file/0017/232082/mobile-spectrum-demand-discussion-paper.pdf](https://www.ofcom.org.uk/data/assets/pdf_file/0017/232082/mobile-spectrum-demand-discussion-paper.pdf)). Paragraphs 2.5 to 2.7 noted:

*"2.5 In the UK there are four Mobile Network Operators (MNOs) - EE, Three, Virgin Media O2 and Vodafone. The MNOs also provide wholesale mobile access to many mobile virtual network operators (MVNOs), such as Tesco, iD (Carphone Warehouse), Sky Mobile and others.*

*2.6 In recent years we have seen an average 40% year-on-year growth in demand for mobile services provided over public mobile networks. This growth has been driven by the development of new applications and enabled by evolving technologies and consequent changes in consumer behaviour.*

*2.7 We expect demand for mobile data will continue to grow as we rely on it ever more to carry out daily activities like shopping, gaming, banking and watching movies. Demand is likely to be stimulated further as new and more sophisticated applications are developed, and by the development of machine-to-machine and machine-to-device applications."*

This increasing demand for mobile data was illustrated in the report by the graph below:



**Growth of monthly mobile data demand 2011-2021 (Source: Mobile networks and spectrum - Meeting future demand for mobile data)**

6. Site Selection Process – alternative sites considered and not chosen.

The applicant's site selection strategy is to keep the overall environmental impact of telecommunications development in the area to a minimum. Icon Tower has deemed it necessary to plan for a new mast with additional capacity, to allow for site upgrades for existing users in the area, as well as future proofing the site for other potential telecommunication innovations. The 25 metre height is required to ensure potential users of the site do not lose coverage. The proposed height is also required to "see over" nearby trees and built form which are particularly problematic when broadcasting signal.

As the proposed development is intended to in time to replace existing telecommunication installations which are already established feature in the area, the applicant has kept the proposed new telecommunications mast at a point whereby a wide coverage area can be achieved by operators, while being located in an area where the principle of development has already been established due to the existing mast. Also, being close to the existing masts, the site would fit into the existing mature network of sites of the operators.

Prior to selecting the proposed site, a comprehensive investigation was undertaken. The aim of site identification is to find the most technically efficient site, which has the minimum impact on visual amenity. Various options might theoretically be suitable in terms of one of these considerations, but not the other. A balance between the two must be achieved. Specifically in this instance, it is imperative for the new site to be able to fit into the existing mature network of sites of the existing operators in the area, therefore a site needs to be located close to the existing installations.

Within the constrained parameters of searching for a new site, the following alternative locations were considered:

	Site Type	Site name and address	National Grid Reference	Reason for not choosing site
D1	GF	Alternative site location - Land at Horndean Football Club, Five Heads Road, Horndean, PO8 9NU	470019, 113496	This is an alternative site within the football club site, in the corner of the car park. The siting would allow for the mast to be constructed on existing hardstanding, however it would result in the loss of car parking spaces. It would also be a more open site and not as suitable as the application site, which benefits from a high degree of screening from trees close to the site.
D2	GF	Alternative site location 2 - Land at Horndean Football Club, Five Heads Road, Horndean, PO8 9NU	469938, 113594	This potential location is at the northern end of the football club site, close to the boundary with Bridle Path. Access to this part of the site is not as suitable as the application site. It is also in close proximity to residential properties and an installation in this location would have a greater impact on residential amenity. For these reasons this site has been discounted.
D3	GF	Land to west of Five Heads Road, Horndean,	469956, 113684	Sites away from the football club were also considered. This is in the corner of a field, with an access gate off Five Heads Road. There is good

		PO9 9NU		access, and a limited level of screening from a hedge along Five Heads Road. However, it is in close proximity to residential properties and the screening is much less than the application site. It is not as suitable as the application site.
D4	GF	Land on eastern side of Five Heads Road, Horndean, PO9 9NU	469959, 113786	This site is moving further from the existing installations at the football club. It would not fit into the existing mature network of sites as the application site. In addition, it would be more visually prominent than the application proposal, as it would be less well screened. Therefore, this site has been discounted.
D5	GF	Land at Horndean Technology College, Barton Cross, Horndean, PO8 9PQ	469893, 113578	This site is well placed, being close to the existing installations in the area. There is also a good level of screening. The site was discounted due to difficulties gaining access to the site, in particular for construction. The site is not considered as suitable as the application site.
D6	GF	Catherington Equestrian Centre, Catherington Lane, PO8 0TB	469357, 113685	This site is some distance west of the application site and other options considered. There is the opportunity for a well-screened development, however it is located too far from the existing installations to fit into the existing mature network of sites. The site has therefore been discounted as it would not provide the required coverage to the target area.

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

N/A

The location of the discounted options is shown on the map below, along with the application site marked as green:



Source: Gridreferencefinder.com

#### Additional relevant information (planning policy and material considerations)

##### **Visual Impact and appearance:**

It is considered that the proposed location is the most suitable site available to the applicant which ensures suitable levels of coverage and capacity can be provided to the area without an unacceptable level of impact. The impact of the proposed development has been minimised as far as practicable, with the need to locate close to the existing installations to fit into an existing mature network of sites, therefore limited siting opportunities.

It is considered the visual impact of the development would not appear excessive. The selected siting is considered wholly appropriate. The proposal has been designed specifically to achieve a balance between meeting the technical requirement and avoiding harm to the setting, both in terms of the impact on visual and residential amenity.

As noted previously there are residential properties close to the site. There are properties in the surrounding area which would have views of the proposed development. There would be an impact on residential amenity, however this would be kept to an acceptable level by the mitigating impact of the trees close to the site, which act as either a screen or a backdrop to limit any impact to an acceptable level.

Whilst the equipment would be visible from certain viewpoints, visibility doesn't necessarily equate to harm, and its impact would be minimal and not sufficient to have an unacceptable level of harm to either visual or residential amenity. **The minimal impact of the development would be outweighed by the significant benefits of the proposal.**

On balance this proposed location is considered to be the optimum location in terms of siting and design, with the extremely limited harm it may impose on the surrounding area being outweighed by the provision of enhanced services to the area in the public interest. As such, equilibrium will be achieved between technical requirements and environmental impact.

## **National planning policy**

### **National Planning Policy Framework (2023) (NPPF)**

The National Planning Policy Framework came into force in 2012. The guidance has most recently been revised in September 2023. The NPPF sets out the Government's planning policies for England and how these should be applied.

Paragraph 7 of the NPPF states "*The purpose of the planning system is to contribute to the achievement of sustainable development*", and in paragraph 10 that "*at the heart of the Framework is a presumption in favour of sustainable development*". In order to achieve the sustainable development objective, the NPPF has identified 3 overarching objectives (paragraph 8):

*"a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

*b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*

*c) **an environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."*

For **decision-taking** (paragraph 11) this means:

*"c) approving development proposals that accord with an up-to-date development plan without delay; or d) 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:*

*i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*

*ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."*

Further to this, paragraph 38 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 brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area."*

The proposed development will enable the provision of enhanced mobile communications services to the surrounding area, bringing about substantial public benefit both socially as well as the allowing for certain businesses to expand, adapt and thrive as well as access new markets. Reliable wireless technology also allows for home working, and the creation of the 'virtual office', thus reducing the need to travel and contributing to the sustainability agenda.

Government advice in recent years has been to promote and encourage communications services. Within his presentation to Parliament in July 2015 of the Government report "Fixing the Foundations: Creating a more prosperous nation" the Chancellor of the Exchequer reiterated the importance of a high-speed digital communication infrastructure. *"7.1 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."*

*By reducing regulatory 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 in March, of near-universal 4G and ultrafast broadband coverage."*

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

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

Leading on from this, paragraph 118 states that *"Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections".*

While supported, the number of base stations are encouraged to be kept to a minimum in which the efficient operation of the network can be provided. Paragraph 119 states that *"The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged".*

The site is proposed to allow site upgrades to enhance coverage and capacity for operators in the area. A new greenfield structure is proposed, however this could be utilised for multiple operators and technologies, and the proposal is considered to be in line with the above policy.

It should be noted that paragraph 122 states that *"Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure"*.

The proposal outlined within this document and the supporting enclosures, is in complete accordance with the guidance as set out in the National Planning Policy Framework.

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

In addition to the NPPF additional guidance is provided within the Code of Practice for Wireless Network Development in England, published by the Department Digital, Culture, Media and Sport ("the DCMS") in March 2022. The Code of Practice is designed to provide guidance to the mobile operators, Local Planning Authorities and relevant stakeholders on how to undertake their roles and responsibilities in the delivery of wireless infrastructure. It has been produced to support the government's objective of delivering high quality wireless infrastructure whilst balancing those critical needs with important environmental considerations.

Paragraph 28 of the Code of Practice echoes the sentiment of paragraph 119 of the NPPF with regards to design, stating that: *"When possible, operators should look to use sympathetic designs, materials and colour (including camouflage where appropriate) to minimise the contrast between infrastructure and the area. Operators should also consider the design principles set out in the NPPF and local planning policies, and consider any relevant local and national design codes"*.

Paragraph 29 goes on to recognise that numerous factors can affect the type of infrastructure than can be deployed and paragraph 37 states: *"Operators have committed to use existing structures for network deployment wherever viable to reduce the need for new development and minimise visual impact. However, new ground-based masts will sometimes be required to accommodate the ever-increasing coverage and capacity needs of the country. 4G and 5G are likely to require further network densification in order to meet growing customer demand for data. Where higher frequencies are used, with lower signal propagation characteristics, apparatus will need to be located in closer proximity to user devices. The type of mast deployed will depend upon the location and setting, as well as the coverage requirements of the site. There are many ways by which the potential for environmental and visual impact of a ground-based mast can be reduced"*.

With specific reference to sites incorporating 5G technology, paragraph 67 goes on to state that: ***"Due to the scale and technological constraints of 5G equipment, in some cases previous camouflage design solutions, such as tree mast designs and concealing antennas in flagpoles, may not be practicable or suitable. In these cases, simple designs with particular attention to colouration and finishes may help reduce visual impacts on a site-specific basis"*** (emphasis added).

The proposed development has taken on-board the advice set out in the Code of Practice. Under the limitations of requiring a relatively substantial structure to potentially support more than one operator, a simple design solution is proposed, and is located close to substantial trees to provide a high degree of screening. Impact would be kept to an acceptable level.



## **Other national policy**

Mobile telecoms networks are now ubiquitous throughout the UK. It is an expectation that an individual can connect and use their mobile phone whenever and wherever they so require. With the advent of new technology, further advances are proposed, and central government has seen the telecoms industry, and 5G, to be at the forefront of economic development.

The expectations are that future telecom's technology will support government policy regarding digital inclusion; improvements in health and social care; assisting in local economic growth; advancing the development of Smart Cities and supporting innovative uses throughout the transport sector for both personal and public travel.

At the beginning of March 2017 the Department of Culture, Media and Sport (DCMS) issued an updated UK Digital Strategy ([UK Digital Strategy](#)) with the goal of ensuring that the UK delivers a "world-leading digital economy that works for everyone". The strategy focuses on seven key strands:

- Building world-class digital infrastructure for the UK
- Giving everyone access to the digital skills they need
- Making the UK the best place to start and grow a digital business
- Helping every British business become a digital business
- Making the UK the safest place in the world to live and work online
- Maintaining the UK government as a world leader in serving its citizens online
- Unlocking the power of data in the UK economy and improving public confidence in its use

The government has noted within the Digital Strategy that the UK lags other similar nations in the delivery of fast, reliable, consistent connectivity for its population, wherever they are in the Kingdom. In conjunction with the new Electronic Communications Code (2018), the DCMS wishes to make it easier for operators to upgrade and share their equipment with other operators to help increase coverage. The DCMS also sees new technology and improved connectivity and coverage as key to the future growth, both socially and economically, of the UK.

Icon Tower is committed to following through on the Government's aims and to responsible development of wireless infrastructure. This submission forms part of private new investment where there is a specific requirement for an upgrade to the existing radio base station at this location to allow for enhanced coverage to the area.

## **Local planning policy**

Section 70 of the Town and Country Planning Act 1990 requires planning applications and appeals to be determined having regard to the provisions of the Development Plan and other material considerations, and section 38 of the Planning and Compulsory Purchase Act 2004 requires applications and appeals to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

For the purposes of Section 70, the current adopted development plan for East Hampshire District Council, relevant to the proposal, comprises the Joint Core Strategy (2014) and the saved policies of the East Hampshire District Local Plan: Second Review.



Most relevant to the proposal is policy U14 of the Local Plan: Second Review, which deals specifically with Telecommunications. For ease of reference the policy is copied below:

*U14*

*Planning permission will be granted for telecommunications installations and equipment provided that:*

- a. the proposal would not harm the character of the area, the appearance of the structure or building (if applicable) or living conditions;*
- b. the applicant has demonstrated that the proposal is the least environmentally intrusive option of the technically feasible alternatives including mast and site sharing, alternative sites and designs, and the use of existing buildings and other structures;*
- c. all reasonable measures have been taken in respect of siting, design and landscaping to minimise the impact of the development; and*
- d. there is no clear evidence that irremediable radio interference will arise, or is likely to arise, with other electrical equipment.*

Great care has been taken to minimise the impact of the proposed development to an acceptable level. A tall structure is proposed, and this is required to provide a suitable antenna height to provide the required level of coverage to the surrounding area, and also to ensure the signal from the antennas propagates effectively above surrounding clutter, in particular the trees in the area. The site is located close to substantial trees to ensure there is a high level of screening. Where the tower would be visible it would have a backdrop of trees. It would therefore not harm the character of the area. Further to this, the site will only be constructed once an operator has committed to its use.

As mentioned previously, the tower is proposed to be left with a galvanised finish. If considered more appropriate the tower could be painted, for example dark green could be an alternative to benefit from its siting close to trees.

Alternative sites have been investigated and this is considered to be the most suitable, in terms of both the coverage it would provide and the level of impact that would result. Alternative sites considered are set out in the preceding section. No additional landscaping is proposed – in this instance it is not considered necessary due to the existing high degree of screening provided by the existing trees around the site. This screening would ensure impact on visual and residential amenity is minimised and is kept to an acceptable level.

It is considered this section has shown that the proposed development complies with both national and local planning policy.


## **Summary**

Taking into consideration all the relevant factors set out above, it is considered that this proposal is the optimum solution in terms of enhanced provision from a single site for multiple operators, minimising any adverse impacts on local amenity. The maximum height of the proposed antennas at 25 metres is the absolute operational minimum to clear the immediate environment and provide coverage.

To summarise the case in favour of the proposal the following points are of relevance:

- With specific regard to telecommunications development, the proposal is fully compliant with National Policy the Code of Best Practice on Mobile Phone Development, and Local Policy;
- It is in accordance with the UK Wireless Infrastructure Strategy which encourages the roll-out of 5G;
- Site selection was progressed in accordance with advice in National Policy and the Code of Best Practice and represents the least environmentally intrusive, technically suitable, available option;
- The operator's site selection strategy is to keep the overall environmental impact to a minimum where the operator will choose a site with the least impact upon the character of the area utilising an existing site is considered preferable;
- The site is submitted as a Prior Notification, in line with the Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2022 which allows up to 30m high ground-based masts to be assessed using the Prior Notification route.
- In this instance, this site is considered to have the least impact upon the character of the local area;
- The proposal fully accords with National and Local Policy and should, therefore, it is respectfully requested that it be approved.

Confirmation that submitted drawings have been checked for accuracy

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