

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	WILLIAMS CYCLES	Site Address:	82-86 ALBION STREET, CHELTENHAM, GLOUCESTERSHIRE, GL52 2SE
National Grid Reference:	395287, 222397		
Site Ref Number:	20596923	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?	Yes	No
If no explain why: Upgrade / replacement of existing site – N/A		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why: Upgrade / replacement of existing site – 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

¹ Macro or Micro

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



Summary of outcome/Main issues raised:

Pre-application correspondence including a covering letter, a consultation plan and drawings was forwarded to the authority's planning department by email on 23rd February 2024.

No response has been received to date.

Annual area wide information to planning authority

Has annual area wide information been provided?	No
If no explain why:	
<p>Summary issues raised:</p> <p>Cornerstone's commercial relationship with Vodafone has changed, effectively increasing our independence to work with other companies in the deployment of mobile infrastructure. It means we no longer have visibility of Vodafone's full update plan. However, Cornerstone is fully committed to working closely with Local Planning Authorities and following best practice guidance.</p> <p>We aim to engage and work with the planning department at the earliest opportunity from when we are instructed to deliver new infrastructure within your Local Authority area and often conduct strategic pre-rollout engagement meetings to discuss our wider rollout. If your Local Authority would like a meeting to discuss wider Cornerstone rollout plans then please advise. We recognise the importance of developing long term partnerships and will always work with you to deliver improved mobile connectivity.</p>	

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
<p>Outline of consultation carried out:</p> <p>Pre-application correspondence including a covering letter and proposed plans were emailed to the following community groups 23rd February 2024.</p> <ul style="list-style-type: none"> All Saints Ward Cllr Barbara Clark & Cllr Izaak Tailford Alex Chalk MP 			

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

Summary of outcome/main issues raised (include copies of relevant correspondence):

No responses have been received to date.

School/College

Location of site in relation to school/college (include name of school/college):

St John's Primary School and Holy Trinity Church of England Primary School in proximity.

Outline of consultation carried out with school/college (include evidence of consultation):

Pre-application correspondence including a covering letter and proposed plans were emailed to the Headteachers and Chairs of Governors on 23rd February 2024.

Summary of outcome/main issues raised (include copies of main correspondence):

No responses have been received to date.

Civil Aviation Authority/Secretary of State for Defence or the operator of the civil safeguarding area or defence safeguarding area notification (only required for an application for prior approval)

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

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	N/A – Full Planning application	

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



3. Proposed Development

The proposed site:

Cornerstone is the UK's leading mobile infrastructure services company. They acquire, manage and own over 20,000 sites and are committed to enabling best in class mobile connectivity for over half of all the country's mobile customers. They oversee works on behalf of telecommunications providers and wherever possible aim to:

- promote shared infrastructure
- maximise opportunities to consolidate the number of base stations
- significantly reduce the environmental impact of network development

Cornerstone is in the process of progressing an upgrade to an existing site within the area to ensure the inclusion of all technologies which will significantly improve service provision for Vodafone Limited, ensuring that the most up to date service provision, including 4G, is provided in this area of Cheltenham.

There is a specific requirement for a radio base station upgrade at this location to provide improved coverage for 4G to the area.

This application seeks consent for the following development:

The removal and replacement of 3 no. new antennas and extension of the support pole on which they are mounted, enclosed with a GRP chimney shroud, at a total height of 19.52 AGL, the replacement of ancillary equipment and development works thereto.

The proposed works relate to an existing rooftop telecommunications site located on Williams Cycles chimney shroud.

The proposed location is shown below:

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





This proposal is made as part of a continued network improvement program and technical requirement to provide improved coverage to the Cheltenham area. A sequential approach has been taken to ensure that existing masts and equipment are used where possible. Following technical assessment however, the existing rooftop installation cannot accommodate the operators' latest technical requirements. As such replacement equipment is required for this upgrade.

The proposal allows the installation to be upgraded and avoids the need for an additional installation. It is considered to be the most unobtrusive way of fulfilling the service requirement.

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

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

N/A – upgrade site

Type of Structure (e.g. tower, mast, etc):

Description:

The removal and replacement of 3 no. new antennas and extension of the support pole on which they are mounted, enclosed with a GRP chimney shroud, at a total height of 19.52 AGL, the replacement of ancillary equipment and development works thereto.

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



Overall Height: 19.52 Metres (to top of GRP shroud)	
Height of existing building (where applicable):	13.18 Metres
Equipment Housing: Existing cabinets	
Length:	Metres
Width:	Metres
Height:	Metres
Materials (as applicable):	
Tower/mast etc – type of material and external colour:	Support pole within GRP chimney shroud
Equipment housing – type of material and external colour:	N/A

<p>Reasons for choice of design, making reference to pre-application responses:</p> <p>The replacement and upgrading of an existing installation is in accordance with the sequential approach to site selection criteria set out within the Code of Practice for Wireless Network Development in England (2022) and is encouraged within the National Planning Policy Framework (2023) over the development of a, separate, new telecommunications site.</p> <p>A pre-application covering letter and drawings was submitted to the Council on the 23rd of February for comments. No response has been received to date.</p> <p>This is an established rooftop site comprising of antennas mounted on a support pole of the rooftop and contained within a chimney shroud on Williams Cycles' chimney. The replacement equipment is required to provide improved and continuous coverage to this area of Cheltenham.</p> <p>The upgrade comprises the removal and replacement of 3 no. new antennas on a new support pole within a GRP chimney shroud of increased height, the replacement of ancillary equipment and development works thereto.</p> <p>With regards to form and scale, the replacement equipment has been sited and designed to replicate the existing installation being located on the existing chimney within an extended GRP shroud. The ancillary equipment is to be mounted on the internal wall. In all aspects of the design the smallest practical components have been utilised to ensure that the visual impact of the development is kept to a minimum and to streamline the design as much as possible, the equipment being hidden within the GRP shroud.</p> <p>The existing 3no. antennas will be removed and replaced on a new support pole within the extended GRP chimney shroud. Ancillary equipment will be removed and</p>
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replaced on the internal wall of the building. The existing equipment within the building will be refreshed internally.

An upgraded installation of increased height is required in this location to provide upgraded coverage and capacity to the locality and take into consideration technical constraints associated with modern technologies and frequencies. As such, there is a need to ensure that the antennas are able to rise above any obstructions including variations in topography. The additional height will also improve coverage in the area for the existing technologies. A height increase of 3.3m is therefore required bringing the height of the installation from 16.2m to 19.52m. This is the lowest possible height which can still deliver the required levels of mobile phone coverage and connectivity to the locality due to the technical constraints.

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

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

The installation has been designed to be read in the same context as the existing equipment, so as to limit visual impact so far as technically possible whilst still working within the technical design constraints of delivering the latest technologies.

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Health and Safety - including ICNIRP compliance

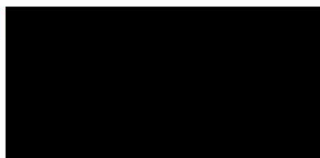
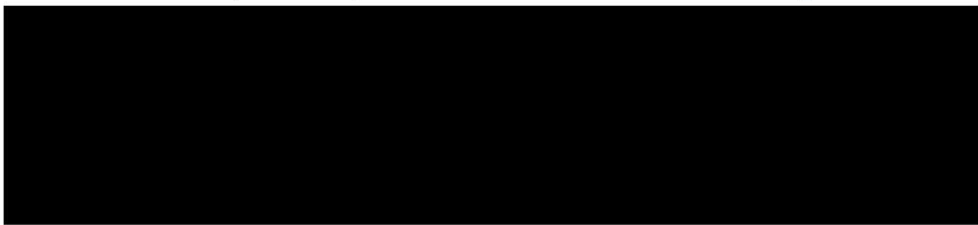
International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines. When determining compliance, the emissions from all mobile phone network operators on or near to the site are taken into account.

In order to minimise interference within its own network and with other radio networks, Vodafone Limited operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision. As part of Vodafone's network, the radio base station that is the subject of this application will be configured to operate in this way.

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

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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.

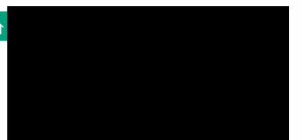
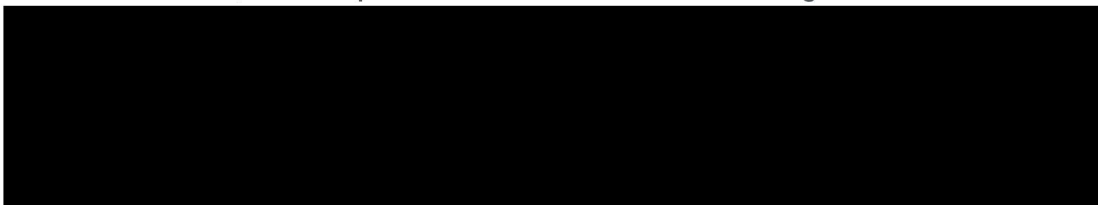
Reason(s) why site required e.g. coverage, upgrade, capacity

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 program is designed to identify and address these gaps within their coverage and ensure that people can use their phones whenever and wherever they are.

There is a specific requirement to upgrade the existing rooftop radio base station at this location to enable enhanced 2G and 4G coverage for Vodafone to this area. This ensures customers are able to continue to use their handheld devices for the purposes in which they have become accustomed, whilst on the move, as demands on the system for greater capacity augment as more customers access the data on the operator's network.

Mobile connectivity and service is required where customers live, work and play. Improved 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 infrastructure within the built environment has had to be reviewed and adapted as appropriate.

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5. Site Selection Process

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

Site Type	Site name and address	National Grid Reference	Reason for not choosing site
N/A	N/A	N/A	N/A

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

This application seeks to upgrade an existing site which has been positioned to ensure the most effective delivery of mobile phone coverage to the locality and where the principle of telecommunications development has already been accepted.

As referred to above, the applicant has taken a sequential approach and is seeking to upgrade the existing established telecommunications site. Due to the size and amount of the required antennas to provide the enhanced 2G and 4G coverage to the area for Vodafone, replacement antennas and ancillary equipment are required. The proposal does not seek to increase width or to move the installation, however, a slight increase in height is required. The equipment will ensure high quality coverage and capacity is delivered to the area for the operator.

These amendments to the existing radio base station will ensure that the latest superfast technologies will be able to be accessed by users in this area, in line with the operator's legal license obligations, and the Government's aspirations that everyone has access to the latest information super highway network and the customers' expectations that their handheld devices are able to operate wherever they are located whether that be indoors or outside.

The upgrading of an existing site / installation is in accordance with the sequential approach to development set out under para 118 of the NPPF (2023) which seeks to upgrade existing telecommunications site first. As such, no alternative site options have been investigated.

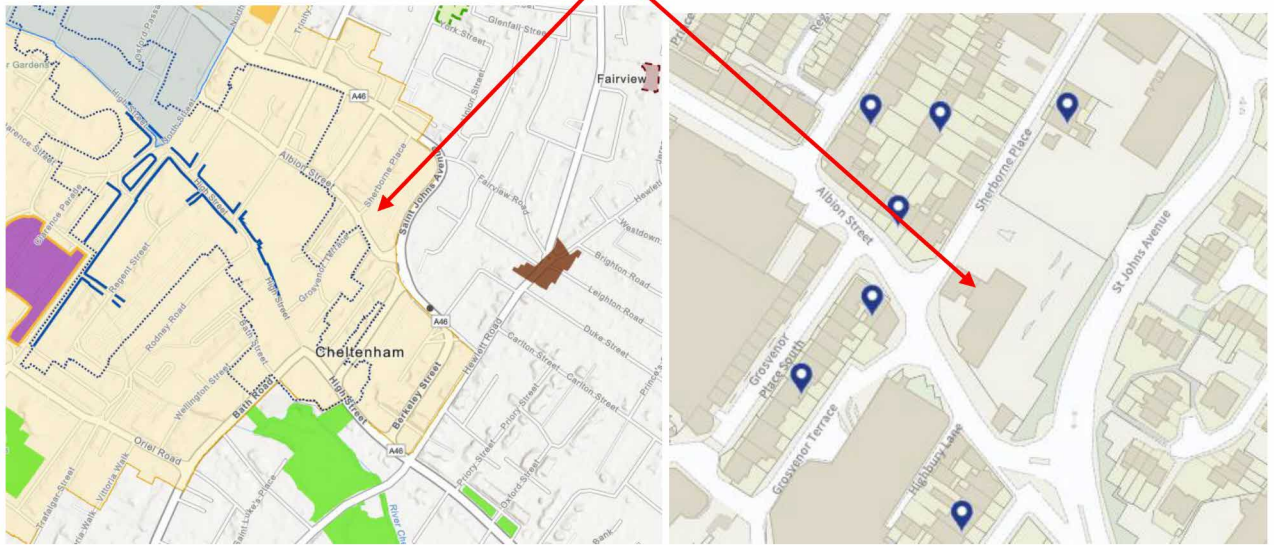
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Land use planning designations:

The Site



The site is within Cheltenham Conservation Area. Please see snip from Cheltenham Planning Policy Map above.

There is one listed building to the south from the site:

- 50-60 Grosvenor Street – Grade II - List UID: 1104303

There is one listed building to the north from the site:

- Number 18-19 and 20 – Grade II - List UID: 1387939

There are also three listed buildings to the west from the site:

- Aldridge House no 79 – Grade II - List UID: 1386676
- Numbers 70 and 80 – Grade II - List UID: 1386675
- 3 Sherborne Place – Grade II - List UID: 1387938

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

Background

As part of Vodafone's continued network improvement program, there is a specific requirement for a radio base station upgrade at this location to provide enhanced connectivity to the area. An existing telecommunications site has been identified;

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however, the current equipment cannot accommodate the operator's latest requirements. As such, the equipment needs to be replaced in order to implement this upgrade to Vodafone services.

The upgrade comprises the removal and replacement of 3 no. new antennas and extension of the support pole on which they are mounted, enclosed with a GRP chimney shroud, at a total height of 19.52 AGL, the replacement of ancillary equipment and development works thereto.

Relevant Planning Policy

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

- Town and Country Planning Act 1990 (as amended)
- National Planning Policy Framework (2023) – Chapter 10
- National Planning Policy Guidance
- JCS Plan Adopted Version December 2017- INF6: Infrastructure delivery; Policy SD8: Historic Environment; Policy SD4: Design Requirements
- Cheltenham Borough Council Local Plan 2011-2031 (adopted July 2020) - Policy CI4: Broadband Provision

Other relevant documents:

- The code of practice for wireless network development in England (2022) – Published by DCLG (referred to herein as the Code of Practice).

National Planning Policy Framework (2023)

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 September 2023, 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.

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 118 states that advanced, high quality and reliable communications infrastructure is

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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 118**. 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.

Paragraph 119 of the NPPF retains the requirement to minimise the number of installations consistent with the efficient operation of the network but also includes being consistent with the needs of consumers and providing reasonable capacity for future expansion.

Paragraph 122 of the NPPF retains the guidance set out in paragraph 46 of the 2012 NPPF version which relates to determining applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.

At the heart of the NPPF is the retained presumption in favour of sustainable development (para 11). For decision-taking this means approving development proposals that accord with an up-to-date development plan without delay or where there are no relevant development plan policies, or the policies which are most 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 38 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'.

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The NPPF builds on the aspiration to build a strong, competitive economy. Paragraph 81 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 innovation⁴²' ...

Footnote 42 of the NPPF states:

'The Government's Industrial Strategy sets out a vision to drive productivity improvements across the UK, identifies a number of Grand Challenges facing all nations, and sets out a delivery programme to make the UK a leader in four of these: artificial intelligence and big data; clean growth; future mobility and catering for an ageing society. HM Government (2017) Industrial Strategy: Building a Britain fit for the future'.

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

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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 in order to support economic growth across the country.

The CoP sets out 'How wireless networks function.

Para. 16 states *"Cellular wireless networks use base stations to provide an area of radio coverage. Wireless technology uses the radio spectrum to broadcast radio waves between base stations and devices. Different radio frequencies have different characteristics which, along with the density of cell site locations, affect the extent of coverage and how much data can be carried over the network. Depending on the radio frequencies used, base stations can deliver coverage over a wide area or provide extra network capacity in areas where there is a high demand for network bandwidth"*.

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:*

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- **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).

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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 CoP. The CoP recognises the importance of collaboration and partnership to help drive network coverage across the country. It goes on to state that ‘*In all instances, it is important for all parties involved in the process to take a positive approach to consultation and engagement*’.

Siting and Design Principles

The government’s objective is to deliver high quality, reliable wireless infrastructure whilst ensuring the impact of new network development is kept to a minimum. The siting and design of wireless network infrastructure is central to achieving this. The CoP acknowledges that ‘*good siting and design principles should apply to all wireless network development and take into account any site specific considerations and context. Both can create better places in which to live and work and help make development acceptable to communities*’.

The Code provides guidance on siting and appearance principles. It sets out several design principles in respect of telecommunications development and acknowledges that the options for design used by an operator will be affected by site conditions including requirements to link the site to the network, landscape features and coverage and capacity requirements. The guidance includes at Para. 22 ‘*the choice over the site selection and design of equipment is primarily dependent upon the coverage and capacity requirements and technical constraints of a specific location, although operators should make efforts to reduce visual impacts where possible*’.

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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).

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

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(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

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Local Plan Policy

Cheltenham Borough Council Local Plan was adopted in July 2020

Policy CI4 – Broadband Provision

“The Council will require new residential and commercial development to be served by a high-speed, reliable broadband connection.

Exceptions may only be made where applicants are able to demonstrate through consultation with broadband infrastructure providers that this would not be possible, practical or economically viable. In such cases, an equivalent developer contribution towards off-site works will be sought which could enable greater access in the future.

This policy contributes towards achieving the Cheltenham Plan Vision: Theme A - objective d.”

Paragraph 17.35 “...The Council wishes to ensure super-fast and fibre broadband is available to all properties at the earliest opportunity and will work with the telecommunications industry to help maximise access to superfast broadband, wireless hotspots and improved mobile signals for all residents and businesses, assisting them in delivering their investment plans and working to address any infrastructure deficiencies or barriers.”

The Joint Core Strategy (JCS) 2011-2031 was adopted by Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council in December 2017.

Policy INF6: Infrastructure Delivery

“1. Where infrastructure requirements are generated as a result of individual site proposals and / or having regard to cumulative impact, new development will be served and supported by adequate and appropriate on- and / or off-site infrastructure and services. In identifying infrastructure requirements, development proposals will also demonstrate that full regard has been given, where appropriate, to implementing the requirements of the Joint Core Strategy Infrastructure Delivery Plan.

2. Where need for additional infrastructure and services and / or impacts on existing infrastructure and services is expected to arise, the Local Planning Authority will seek to secure appropriate infrastructure which is necessary, directly related, and fairly and reasonably related to the scale and kind of the development proposal, including:

- i. Broadband infrastructure;
- ii. Climate change mitigation / adaptation;
- iii. Community and cultural facilities and initiatives;

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- iv. Early Years and Education;
- v. Health and well-being facilities and sport, recreation and leisure facilities;
- vi. The highway network, traffic management, sustainable transport and disabled people's access;
- vii. Protection of cultural and heritage assets and the potential for their enhancement;
- viii. Protection of environmental assets and the potential for their enhancement;
- ix. Provision of Green Infrastructure including open space;
- x. Public realm;
- xi. Safety and security including emergency services.

This list of potential infrastructure items is neither exhaustive, sequential nor are its elements mutually exclusive.

3. Priority for provision will be assessed both on a site-by-site basis and having regard to the mitigation of cumulative impact, together with implementation of the JCS Infrastructure Delivery Plan.

4. Planning permission will be granted only where sufficient provision has been made for infrastructure and services (together with their continued maintenance) to meet the needs of new development and / or which are required to mitigate the impact of new development upon existing communities. Infrastructure and services must be provided in line with an agreed, phased timescale and in accordance with other requirements of this Plan.

This policy contributes towards achieving all the JCS Strategic Objectives."

PLANNING ASSESSMENT

Principle of Development

The principle of development has been established by the approval of previous applications in this location.

Whilst the principle of development has already been established, it is useful to draw attention to the following paragraphs of the NPPF (2023) which bring further context to this application.

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

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

Chapter 10 [Para's 118-122] (Supporting High Quality Communications) is most relevant to this application.

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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 and full fibre broadband connections”.

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.

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”.

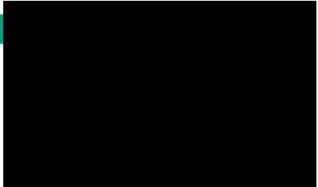
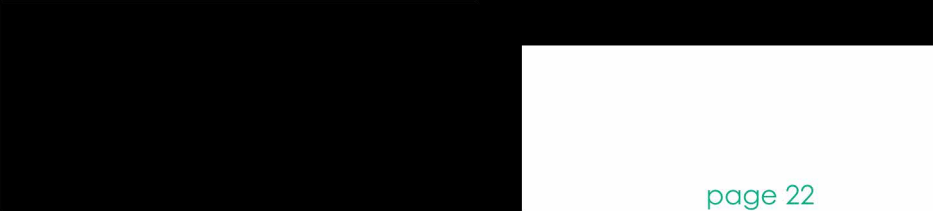
Para 121 requires “Applications for electronic communications development (including applications for prior approval under the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development. This should include:

- a) 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, technical site or military explosives storage area;
- b) for an addition to an existing mast or base station, a statement that self-certifies that the cumulative exposure, when operational, will not exceed International Commission guidelines on non-ionising radiation protection; or
- c) for a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure and a statement that self-certifies that, when operational, International Commission guidelines will be met.

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”.

At the heart of the NPPF is the retained presumption in favour of sustainable development (para 11). For decision-taking this means approving development proposals that accord with an up-to-date development plan without delay or where there are no relevant development plan policies, or the policies which are most

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important for determining the application are out-of-date, granting permission unless the application of policies within the revised Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed or any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the revised Framework taken as a whole.

The NPPF continues to provide guidance on decision-making. At paragraph 38 it states that:

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

The NPPF builds on the aspiration to build a strong, competitive economy. Paragraph 85 states:

'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking 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 innovation⁴² ...

Footnote 44 of the NPPF states:

'The Government's Industrial Strategy sets out a vision to drive productivity improvements across the UK, identifies a number of Grand Challenges facing all nations, and sets out a delivery programme to make the UK a leader in four of these: artificial intelligence and big data; clean growth; future mobility and catering for an ageing society. HM Government (2017) Industrial Strategy: Building a Britain fit for the future'

With regards to para 121, this application includes copies and a summary of pre-consultation correspondence. A certificate of ICNIRP compliance (which also supports para 114) and evidence that a sequential approach to development has been taken ensuring that there are no existing sites which can be shared, buildings or structures utilised and is therefore in full conformity with para 121.

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The proposal seeks to expand the electronic communications network to provide advance, high quality and reliable communications infrastructure in accordance with para 118 of the NPPF. This installation is proposed following an identified need for upgraded coverage to meet customer demands, to ensure the efficient operation of the network, including the provision of modern technologies and frequencies and provide reasonable capacity for future expansion. The operator has taken a sequential approach to development and has explored the use of existing masts, sites and buildings. In this instance it has been possible to provide the required levels of coverage and range of technologies required through upgrading the existing rooftop mast in accordance with para 119 of the NPPF. Addressing this requirement through the upgrading of this existing mast will reduce the number of masts needed within the locality and keeps the number of installations to a minimum, also in accordance with para 119 of the NPPF (2023).

At a local level, the installation is in accordance with the provisions of the Infrastructure Policy C11 - Cheltenham Plan in that the proposed development will provide improved connectivity to the area. This modest upgrade will ensure that there will be no significant adverse effect on its setting, landscape character or visual amenity.

The development will also accord with the overarching objective of the Cheltenham Local Plan and JCS Strategic Objectives which seeks to ensure that the residential and commercial developments are served by a high-speed and reliable broadband connection. The provision of high-speed telecommunications connection supports these objectives.

The provision of additional services is by the upgrading of an existing site and an ICNIRP certificate is provided with this application.

It is argued therefore that the principle of the development is acceptable.

Siting and appearance

The Code of Practice states at Para 25:

'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;*

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- *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)'.*

The proposal relates to an existing rooftop base site which is proposed to be re-developed and will provide improved coverage for the operator. Replacement equipment is required to upgrade the site to provide modern technologies and frequencies and ensure that effective up to date coverage and capacity can be provided to the locality for Vodafone users.

Policy SD4 of the local plan seeks to ensure that development is of a high quality. Telecommunications development is ultimately functional in nature however a high-quality design has been proposed which seeks to balance technical requirements and operational efficiency with planning considerations including design and visual amenity impact.

The siting of the mast will be in the same location and the design proposed will be similar to the existing, requiring the replacement of 3 no. antennas on a support pole which are enclosed and camouflaged within the GRP mock chimney shroud.

The main difference between the existing and proposed development is the increase in height of the antennas that is required and the subsequent extension of the GRP shroud to contain the antennas and extended support pole. The existing support pole and GRP shroud is to be extended from a total height of 16.2m AGL to a total height of 19.52 AGL – approximately 3.3m height increase. This increase in height is required to ensure that antennas are able to rise above any obstructions, enabling the required coverage to reach the required extent of the target area. The Code of Practice highlights at Para. 26 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. One of the key technical and operational consideration for installation sites is:

- **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.

This current application does not seek to amend the position of the mast or to increase its width. The replacement antennas are a similar to the existing and will be disguised within the extended GRP shroud.

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Whilst the increase in height will be noticeable from some vantage points, given the location of the antennas within the mock GRP chimney shroud and when considered in the context of the existing installation and roofline, the increased height of the antennas and extension of the GRP shroud would not result in an unacceptable impact on visual amenity or character.

This is the lowest possible height which can still deliver the required levels of mobile phone coverage and connectivity to the locality due to technical constraints and therefore seeks to protect the character of the area through the selection of the least detrimental design, keeping the installation hidden within the GRP shroud.

The proposed design is in accordance with the existing, this application seeking to just replace equipment on the existing installation and retain the shrouded mock chimney design. Ultimately this assessment finds that the upgraded installation would be in broad accordance with the aim of Policy INF6, SD4, CI4, to provide high quality development of appropriate design, when taking into consideration the technical constraints that exist.

Heritage Impacts

It is acknowledged that the site is located within the extended Cheltenham Conservation Area.

Policy SD8 seeks to protect the character and appearance of conservation areas.

The scheme is designed at the minimum height and scale to provide the required level of coverage and it is not possible to provide the service from outside the conservation area. The site is an established telecommunication site on the chimney shroud of the building and would be viewed in the context of the building. The proposed scheme seeks to retain the design and location of the pole mounted antennas, however, a heights increases is required. There are multiple listed buildings in the area, however, the nearest two are located to the west of the site Aldridge House and 3 Sherborne Place. The listed buildings 18, 19 & 20 Sherborne Place to the north are located beyond the Builders Yard and Car Park and are not facing the site. Notwithstanding this, the proposed development would result in a scheme which is similar to the existing installation which has previously considered to be acceptable with regards to siting and appearance. Given the camouflaged design of the installation within the GRP chimney shroud, the meaning and significance of these heritage assets is not impacted by the telecommunications equipment when considered in the context of the existing installation in accordance with policy SD8 of the Local Plan.

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Para 18 of (Reference ID: 18a-018-20190723) of Planning Practice Guidance's Historic Environment Chapter states that "works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all".

As such, given the design of the installation within the GRP chimney shroud, it is considered that the proposed upgrade would result in minimal harm to the conservation area and to the heritage assets. Para 208 of the NPPF (2023) states that "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".

There are significant benefits associated with the provision of upgraded coverage. These are considered in more detail in the following sections. It is argued that great weight should be afforded to the provision of these new and improved technologies and that any harm to the Conservation Area and heritage assets would be minimal as has already been set out above.

Lack of Coverage – Material Consideration

In accordance with the NPPF and the governmental objective to improve digital connectivity, the proposed installation is significant to enable continuous coverage of the telecommunication network, ensuring that this area continues to get the mobile coverage it needs for Vodafone customers as well as improved 4G coverage. It will also maintain and improve coverage for the Mobile Virtual Network Operator's (MVNOs) which use the Cornerstone network which includes GiffGaff, Tesco Mobile, Sky Mobile and Lyca Mobile on the VMO2 network and VOXI, Lebara Mobile and Talkmobile on the Vodafone network. So, the proposal will not only provide a service for the Cornerstone operators but those who buy network space off them, which is 3 with Vodafone. This will provide a choice for those customers who consider the level of coverage in their area when selecting which operator they agree future contracts with.

The current proposals will facilitate the development of an advanced broadband telecommunications infrastructure in line with National Government guidance contained within the NPPF which supports infrastructure especially where growth takes place. By providing the fast technology the proposals will also support the extension of good quality digital infrastructure to enable improvements in digital connectivity that will support local residents and businesses in the recovery from Covid-19, allowing people to work from home and access the internet whenever and wherever they need to.

The proposed replacement apparatus will also fully comply with the NPPF. There is an identified need for the upgrade to the existing site in order to provide the latest

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technology to this area, ensuring there is sufficient capacity in the network to prevent buffering as greater demands on the network lead to additional pressure on capacity. If there is insufficient capacity then even if coverage is available customers would increasingly be unable to utilise their handheld devices for the manner in which they have become accustomed. Ensuring that the coverage is sufficiently enhanced within the area is fully in line with the requirements of NPPF which recognises the importance of providing 21st Century Infrastructure to support an increasing population.

Economic and Social Benefits

The NPPF strongly supports sustainable development, as does the authority's Local Plan. 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 and local plan, 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 and local plan support development that improves the economic, social and environmental conditions in the area. Enhancing the 2G and 4G coverage and capacity in this area will fully meet this national and local policy objective. Continuing to transform the digital connectivity of the area to drive economic growth and innovation, working to meet national targets of full roll-out of the new technologies for most people by 2027, will ensure economic growth and social well-being.

OTHER RELEVANT INFORMATION

Connected Nations 2021 Report (June 2021)

The importance of the internet and access to smartphones is acknowledged within the latest Online Nation 2021 Report (June 2021). The report notes that the pandemic has highlighted the importance of being online and driven changes in the take-up and use of internet services, as many people have had a critical reliance on the

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internet for communications, information, entertainment and commerce. Increases in internet use in 2020 were most pronounced in spring and November 2020 lockdowns, as people turned to the internet and were more dependent than ever on online services for video calling for socialising or home-based working, home schooling, keeping in touch, films and gaming, shopping and information about the pandemic.

In September 2020, UK Internet users spent nearly 4 times as much time on smartphones than they did on computers. 68% of the time spent online was via smartphones up 4% from September 2019, this was compared to 18% of time spent on line via computers and 13% via tablets.

By the end of 2020 approximately 94% of UK homes had internet access, up from 89% in 2019. Video calling became an important way for people to keep in touch during the pandemic. Zoom went from a few hundred thousand users in the first few months of 2020 to more than 13 million in April and May 2020. This has dropped to 10.4 million users in March 2021, while platforms used mainly for work and education, notably Microsoft Teams have shown a sustained increase in use (13.7 million users in March 2021m up by 5.3 million year on year).

The report found that most of the time people spend on the internet is via apps on mobile devices. Online services were a crucial way for people to find out information about the pandemic, and for governments to try and track and control the spread of the virus.

The report acknowledged that the internet helped most children continue their education throughout lockdown. Virtually all households with school-aged children had access to the internet at home. 7% did not have fixed broadband and 4% had access only to a mobile phone. 1 in 5 did not have access to an appropriate device for their schoolwork all the time. The Report found that 2020 saw the rapid adoption of digital remote education by teachers, parents and children such as video conferencing, and platforms for setting and collecting work. In the first few weeks of lockdown in spring 2020, two thirds of children in England were not receiving any live or recorded lessons. By January 2021, this was down to just one in ten. The Report suggests that the use of these platforms may continue such as for those who can't attend school due to illness, or to provide additional revision materials.

Nine in ten 8 – 15 year olds who use social-media said it helped them to feel closer to their friends in 2020. The report stated that social video services offer huge benefits for users and the economy. They provide a platform for self-expression through enabling user-generated content (31% of adults and 40% of 13-17 year olds post video content).

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



Lockdown influenced the types of social video that were most popular such as the first episode of Joe Wickes' PE which was the most viewed YouTube video of 2020, and videos relating to home baking such as sourdough bread increased by 458%.

Social media serves as a means of entertainment and education for many (used by 97% of adult internet users), and as an important method of marketing for businesses (online video advertising grew by 23% in the UK in 2020).

Online retail spend in the UK increased by 48% in 2020 (compared to an average annual increase of 13% in the previous 4 years). Online's share of retail spend increased from approximately 20% in 2019 to 35% in the spring lockdown and 30% in December 2020. By December 2020 11% of the UK grocery market sales were online, up from 5% at the beginning of the year. Online food delivery services also increased in demand. Just Eat being the most popular with its UK orders up 58% higher in the last quarter of 202 compared to the same period in 2019.

People have relied on the internet for news and information throughout the pandemic. During the spring 2020 lockdown 52% of people said that news and current affairs was one of their main reasons to go online.

Adults are as likely to use social media to find information about the COVID-19 pandemic as they are to use news sites and apps (approximately 1 in 3). Whilst one in eight 16 – 24 year olds considered social media to be their most important source of information about the coronavirus pandemic, compared to 5% of all UK online adults.

The report found that 91% of households used smartphones to access the internet in 2021, compared to 65% who used tablets and 47% who accessed the internet using computers. The report also noted that 61% of UK adults who access the internet did so using both computers and smart devices.

The Report notes that the smartphone is the most-used device for accessing the internet for all age groups apart from those aged 65 +. It found that in 2020, 85% of internet users aged 16 + used a smartphone to go online, compared to nearly 75% accessing the internet via a computer and just over 50% using a tablet to access the internet. One in ten adults also stated that they only use a smartphone to go online and three in ten used their phone to complete an online form or app on a weekly basis.

In February 2021 the Government said that more than 1.7 million app users across England and Wales had been advised to isolate by the NHS COVID-19 app, following close contact with someone who had tested positive.

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Summary

National planning policy is to facilitate the growth of existing and new telecommunications systems, and operators have obligations to meet customer demands for improved quality of service. This development proposes an upgrade to existing coverage to the surrounding area for Vodafone Ltd to provide modern technologies and frequencies.

The NPPF is clear that the upgrading of existing sites is preferable over the creation of new. This preference for a sequential approach to development is also set out within the Code of Practice for Mobile Network Development in England (2022) which is published by DCMS.

To upgrade the site modern equipment is required. Replacement antennas and ancillary equipment are required to provide improved coverage to the locality and take account of technical constraints.

The replacement installation will be read in the context of the existing installation and remains similar to that which is already in place – replacement equipment within an extended GRP chimney shroud. The installation would be of a high-quality design when considering the technical constraints to development and design and is therefore considered to accord with the relevant Policy within the NPPF, Cheltenham Plan and The Joint Core Strategy.

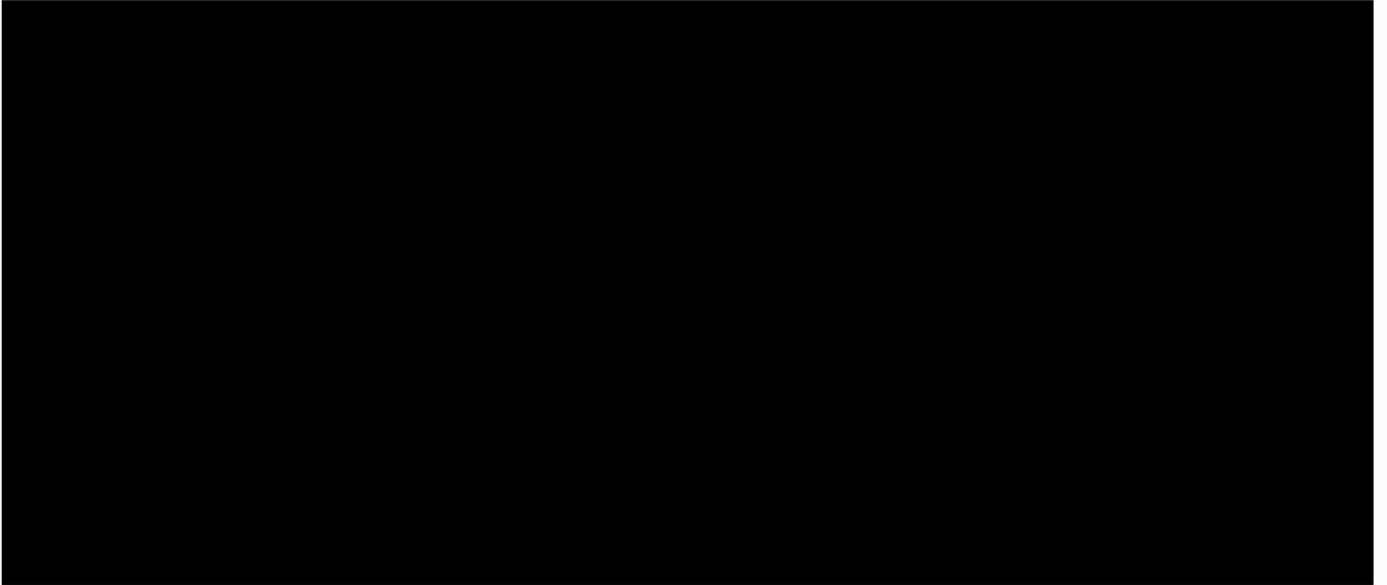
The upgraded installation would bring significant public benefit through the provision of improved coverage and the new technologies. The benefits of which have been set out within this document and should be considered.

The proposal is fully compliant with ICNIRP guidelines and declaration of compliance has been provided.

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Confirmation that submitted drawings have been checked for accuracy



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