ICON TOWER
INNOVATIVE INFRASTRUCTURE SOLUTIONS

Perry Williams Ltd

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Bromyard Town Football Club	Site Address:	Land at Bromyard Town Football Club, Delahay Meadow Stourport Road Bromyard HR7 4NT
National Grid Reference:	E: 366125 N: 254904		
Site Ref Number:	DUR0009	Site Type:[1]	Macro

2. Pre Application Check List

Site Selection (for New Sites only)
(Would not generally apply to upgrades/alterations to existing site including redevelopment or replacement of an existing site to facilitate an upgrade or sharing with another operator)

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

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	No
Date of pre-application contact:	N/A
Name of contact:	N/A

[1] Macro or Micro

Summary of outcome/Main issues raised: A pre-application consultation letter and plans were emailed to the Chief Planning Officer of Herefordshire Council on 04/12/2023. No site specific comments have been received.

Annual area wide information to planning authority

Has annual area wide information been provided?	No
If no explain why:	See below
Summary issues raised: Icon Tower are an independent infrastructure company and therefore they do not have visibility of the MNO's annual area wide information. However, Icon are fully committed to working closely with Local Planning Authorities and following best practice guidance.	

Community Consultation

Rating of Site under Traffic Light Model:	~~Red~~	**Amber**	~~Green~~
Outline of consultation carried out: Pre-application consultation letters and proposal drawings were emailed to the ward councillor for Bromyard Bringsty (Councillor Pete Stoddart), Brockhampton Group Parish Council, and Bill Wiggin MP for North Herefordshire on 04/12/2023.			
Summary of outcome/main issues raised (include copies of relevant correspondence): No responses have been received at the time of making the application.			

School/College

Location of site in relation to school/college (include name of school/college): None nearby in line with Code.
Outline of consultation carried out with school/college (include evidence of consultation): N/A
Summary of outcome/main issues raised (include copies of main correspondence):

N/A

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

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

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	Developer's notice served 26/07/2024, copy of notice and proof of delivery enclosed.	

3. Proposed Development

The proposed site:
Icon Tower Infrastructure Ltd (Icon Tower) is a UK company owned by Radius Global Infrastructure, Inc (Radius). In the UK, Icon Tower is an Electronic Communications Code Operator and reflecting its operations, it is an "Infrastructure System" provider. An infrastructure system is essentially a network of sites where passive infrastructure is made available for sharing by other operators. In the UK, Icon Tower has an established portfolio of sites hosting MNOs. In addition to this, Icon has access to a further 1,600 locations held by the wider Radius group and which also host a variety of operators. 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
INNOVATIVE INFRASTRUCTURE SOLUTIONS

Perry Williams Ltd

This application is submitted for and on behalf of Icon Tower. The proposal is considered the most suitable option for both the operational needs to the clients and in terms of local planning policies and national planning policy guidance. The application relates to:

The proposed shareable telecommunications base station installation comprising a 25m lattice tower supporting up to 12 no antennas and up to 4 no dishes together with up to 6 no ground based cabinets, 1 no meter cabinet and ancillary development thereto including compound fencing.

This multi user structure with secure compound can enable a consolidation of equipment and in time may lead to the removal of unused infrastructure from the wider site and cell area.

The proposed equipment will be located within the existing car park land at the Bromyard Town Football Club. The site is approx. 1km to the east of Bromyard town centre with access off B4203 to the north. The football pitch is to the north of the site and the clubhouse is to the east. The site is surrounded by agricultural fields in all other directions, with Brick Barn Farm approx. 300m to the south east, and the industrial buildings on the eastern edge of the town are approx. 290m to the west of the site. The nearest residential properties are over 120m away to the north, there is mature hedgerow and trees on along the northern edge of the football club which separates the sites.

The proposed equipment is sited adjacent to an existing mature Oak tree and hedgerow. The football ground is also surrounded by mature hedgerow on the western edge which appropriately separates the pitch from the application site and access. There are also mature trees to the south of the application and dense woodland to the east and further south beyond the site. These features will aid in screening the majority of the development and assimilating it within the wider landscape.

The site will be viewed in the context of the existing football club, there are mature trees and hedgerow both within the site and in the wider landscape. There are also existing floodlights and telegraph poles with associated overhead lines within close proximity to the site. The site is set back 140m from the public highway and so it will not be widely visible from public vantage points or outside the immediate vicinity of the site.

There are two existing telecommunications installations nearby, approx. 90m to the north east of the application site, these are third party operator installations. The proposed new shareable installation will allow the operators at these sites to enhance their service and in the future may allow for the consolidation of their equipment, which would minimise the overall number of telecommunications installations over time, whilst ensuring that sufficient, reliable coverage is provided to residents, businesses and visitors in this area of Bromyard.

The Government have placed a great level of importance on providing 5G coverage throughout the UK, as outlined later in this statement. The Wireless Infrastructure Strategy, published in April 2023, outlines the Government's ambitions for the UK to have nationwide

coverage of standalone 5G to all populated areas by 2030. As such, the main mobile network operators are seeking to upgrade their networks to 5G.

The existing coverage for the main mobile network operators in the area has not been upgraded to provide 5G coverage. The proposed shareable installation will allow these operators to provide new 5G provision to the area, and allow consolidation of their equipment on one tower, which would minimise the overall number of telecommunications installations over time, whilst ensuring that improve, reliable coverage is provided to residents, businesses and visitors in this area of Bromyard.

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

The proposed installation will allow the four main UK mobile network operators, virtual mobile network operators who share their networks, and over 100 other smaller essential networks, to consolidate their sites and share one installation. This is in full accordance with the Code of Practice for Wireless Network Development in England (March 2022) and National Planning Policy Framework (December 2023) which both promote site sharing principles.

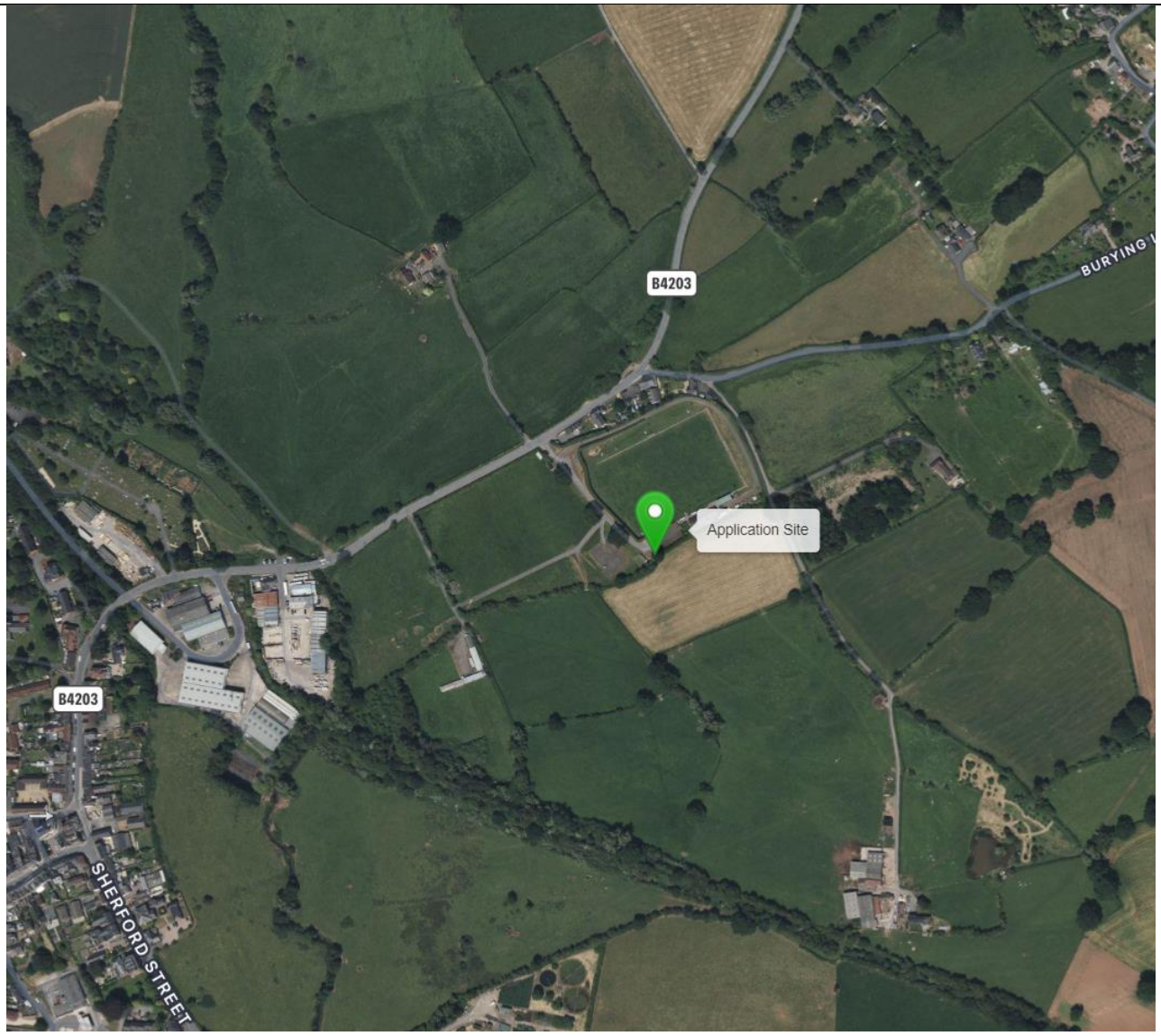

Image 1 – Aerial view of application site (Source: Grid Reference Finder)

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

Icon Tower are an infrastructure company. They aim to locate their sites close to existing telecommunications infrastructure, so that other operators may utilise their tower without detrimentally impacting their coverage footprints in the area.

Type of Structure *(e.g. tower, mast, etc): 25.0m High Swann 5SH lattice tower*

ICON TOWER
INNOVATIVE INFRASTRUCTURE SOLUTIONS

Perry Williams Ltd

Description: The proposed shareable telecommunications base station installation comprising a 25m lattice tower supporting up to 12 no antennas and up to 4 no dishes together with up to 6 no ground based cabinets, 1 no meter cabinet and ancillary development thereto including compound fencing.	
Overall Height: 25.0m	
Height of existing building *(where applicable)*:	N/A
Equipment Housing: Up to 6 no. equipment cabinets and 1 no. electric meter cabinet	
Materials (as applicable):	
Tower/mast etc – type of material and external colour:	Steel – Galvanised (Can be changed to alternative RAL colour on request by LPA)
Equipment housing – type of material and external colour:	Steel – RAL 6009 Green (Can be changed to alternative RAL colour on request by LPA)

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

In line with NPPF and the Code of Practice, Icon Tower has carefully considered the design of the proposed installation. The proposed structure will allow several operators to share the installation, consolidating equipment and promoting site sharing.

Para. 119 of NPPF states:

"119. 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..."

The Code of Practice, at para. 69, states:

"69. Operators should seek to share sites where possible, site sharing reduces the number of sites required and network proliferation. However, site sharing means that masts must safely accommodate equipment for all technologies (2G-5G) from multiple operators. Existing masts may be required to be strengthened or replaced with a larger, lattice-type structure…"

The proposed installation will not only allow all four MNOs to share the structure if required, but also smaller essential networks locally. As such, the proposed design has to be robust enough to support all of the potential equipment required. In addition, due to the proposed height, the structure has to be safe from a windloading perspective. In this instance, the proposed design is a lattice tower with one headframe. This is considered to be a more suitable design solution in this semi-rural location with numerous mature trees on the site and

in the wider landscape, as it allows light to pass through it, which reduces the visual impact, particularly in long views.

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 antennas must be able to 'see' over any obstructions. This is acknowledged at Para. 39 of the Code of Practice:

"39. Mast positioning: all new masts should be sited, so far as practicable, so as to minimise their impact on their setting, including the landscape and any buildings… Placing a mast within or adjacent to an existing group of trees, vegetation and other natural features can reduce visual impact. Care should be taken to minimise the unnecessary loss of existing trees, though antennas will need to be sufficiently elevated to clear the tree-line…"

The site will be viewed in the context of the existing football ground and clubhouse, as well as the mature trees and hedgerow both within the site and in the wider landscape. There are also two existing masts, floodlights and telegraph poles within close proximity to the site. The site is set back 140m from the road and away from the football ground so it will not be widely visible from public vantage points or outside the immediate vicinity of the site.

This proposal, coupled with the ability to consolidate nearby existing masts, will make an overall improvement to the visual amenity of the area by condensing the potential number of telecommunications sites to one single installation, which is fully in line with national planning policy and guidance.

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

4. Technical Information

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

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)	Yes	

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, Icon Tower Infrastructure Limited (Icon) operate their networks in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision. As part of Icon'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.		

5. 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

As explained above, the proposed installation will allow existing sites in the area to be consolidated, and will provide a structure for other operators who may wish to roll out in this area to utilise (including smaller essential network operators).

Over time, this will ensure that the number of telecommunications installations in the area are minimised, which is in full accordance with national planning policy and guidance.

6. Site Selection Process

The applicant's site selection strategy is to keep the overall environmental impact to a minimum. Improvements in telecommunications technology have led to a large number of existing sites around the UK becoming unsuitable, as existing structures cannot support the required upgrades to the existing systems currently located on them. Each time this occurs, a redevelopment of the existing structure is required. Icon Tower aims to minimise the number of sites that require redevelopment, by providing a shareable structure that all Mobile Network Operators and small essential network providers can utilise. Existing sites that are redundant can then be removed, minimising the overall number of installations, which is in full accordance with national policy and guidance.

As the proposed site aspires to be utilised by MNOs, it is important that the new site is co-located alongside existing sites in the operators' networks, to ensure that the site will be able to integrate into those networks and cover the same target coverage areas, providing enhanced coverage to local residents, businesses and visitors.

Site Type	Site name and address	National Grid Reference	Reason for not choosing site
Existing telecoms mast (D1)	CTIL 125468:BROMYARD, Existing Mast at Bromyard Town Football Club, Burying Lane, Bromyard	E366197, N254957	This is an existing nearby mast which is unable to host new or multiple technologies. The proposed new shareable installation will allow the operators at these sites to enhance their service and in the future may

	Downs, Norton, Bromyard, HR7 4NT		allow for the consolidation of their equipment, which would minimise the overall number of telecommunications installations over time.
Existing telecoms mast (D2)	Airwave WME102O:Airwave Site, Existing Mast at Bromyard Town Football Club, Burying Lane, Bromyard Downs, Norton, Bromyard, HR7 4NT	E366213, N254955	This is an existing nearby mast which is unable to host new or multiple technologies. The proposed new shareable installation will allow the operators at these sites to enhance their service and in the future may allow for the consolidation of their equipment, which would minimise the overall number of telecommunications installations over time.
Greenfield (D3)	Land to south of Burying Lane, Bromyard Downs, Norton, Bromyard, HR7 4NU	E366295, N254941	Whilst there is adequate space to build an installation at this location, it is foreseen that building the site would cause considerable issues with crane access as well as ongoing maintenance. As such, this site has been discounted.
Greenfield (D4)	Land off Burying Lane, Bromyard Downs, Norton, Bromyard, HR7 4NU	E366634, N254992	This location has been discounted as it is outside the optimal search area for the network.
Greenfield (D5)	Land to north of Burying Lane, Bromyard Downs, Norton, Bromyard, HR7 4NU	E366396, N255180	A site in this location would not be able to be built due to the proximity of overhead power lines would make the installation of a radio base station in this location problematic. A site in this location has therefore been discounted for this reason.
Greenfield (D6)	Land at Brick Barn Farm, Linton, Bromyard, HR7 4QQ	E366325, N254616	This location has been discounted as it is outside the optimal search area for the network.
Greenfield (D7)	Land to south of B4203, Bromyard Downs, Norton, Bromyard, HR7 4NT	E366008, N254924	An installation at this location is considered to be too exposed with limited screening and other alternatives exist which are more appropriate in order to deliver the required coverage to the target area.

			This site has therefore been discounted for this reason.
Greenfield (D8)	Land to south of Burying Lane, Bromyard Downs, Norton, Bromyard, HR7 4NU3	E366444, N255048	Whilst there is adequate space to build an installation at this location, it is foreseen that building the site would cause considerable issues with crane access as well as ongoing maintenance.
Greenfield (D9)	Land to south of B4203, Bromyard Downs, Norton, Bromyard, HR7 4NT	E366118, N254791	Whilst there is adequate space to build an installation at this location, it is foreseen that building the site would cause considerable issues with crane access as well as ongoing maintenance.
Greenfield (D10)	Travis Perkins, Broadbridge, Bromyard HR7 4NT	E365827, N254788	There is insufficient space at this location for a mobile telecoms installation. Any reduction in overall space on site would detrimentally affect the daily operations of the Travis Perkins. As such, this location has been discounted.
Greenfield (D11)	Land to north of B4203, Bromyard Downs, Norton, Bromyard, HR7 4NT	E365990, N255009	An installation at this location is considered to be too exposed with limited screening/backdrop and other alternatives exist which are more appropriate in order to deliver the required coverage to the target area. This site has therefore been discounted for this reason.
Greenfield (D12)	Land to south of B4203, Bromyard Downs, Norton, Bromyard, HR7 4NT	E366277, N254882	Whilst there is adequate space to build an installation at this location, it is foreseen that building the site would cause considerable issues with crane access as well as ongoing maintenance.
Greenfield (D13)	Land to south of B4203, Bromyard Downs, Norton, Bromyard, HR7 4NT	E366090, N254869	Whilst there is adequate space to build an installation at this location, it is foreseen that building the site would cause considerable issues with crane access as well as ongoing maintenance.
Greenfield (D14)	Land to north of B4203, Bromyard Downs,	E366150, N255077	An installation at this location is considered to be too exposed with limited screening/backdrop and other

	Norton, Bromyard, HR7 4NU		alternatives exist which are more appropriate in order to deliver the required coverage to the target area. This site has therefore been discounted for this reason.

Image 2: Map of discounted options (red pins) and application site (green pin) (Source: Grid Reference Finder)

Link to Grid Reference Finder:
https://gridreferencefinder.com/#gr=SO6612554904|Application_s_Site|2,SO6619754957|D1|1,SO6621354955|D2|1,SO6629554941|D3|1,SO6663454992|D4|1,SO6639655180|D5|1,SO6632554616|D6|1,SO6600854924|D7|1,SO6644455048|D8|1,SO6611854791|D9|1,SO6582754788|D10|1,SO6599055009|D11|1,SO6627754882|D12|1,SO6609054869|D13|1,SO6615055077|D14|1

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

N/A

Land use planning designations:

The site does not fall within any known designated areas.

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

National Planning Guidance

Planning policy is provided at the national level by the National Planning Policy Framework (NPPF). It is a material consideration in planning decisions.

It is not necessary to quote extensively from this document but the following points are highlighted.

National Planning Policy Framework (December 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 July 2021, in order to strengthen sections including requirements on improved design quality, a new requirement for Councils to produce local design codes or guides, an emphasis on using trees in new developments, revised policies on plan-making, removing statues and opting out of PD rights relating to residential conversions. It was most recently updated again in December 2023, in relation to a number of themes including; flexibility for planning authorities in local housing need, clarification of Green Belt boundary alterations and acceptable brownfield development within the Green Belt. It strengthens the importance of building 'beautifully' and respecting the character of an area. It removes the need for annual five-year land supply updates, and protects neighbourhood plans from speculative development for five years. Also, the update encourages community-led and self-build developments and further protects agricultural land in its availability for food production. The update does not change any parts relating specifically in relation to telecommunications.

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 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.

The NPPF supports the expansion of telecommunications:

> *"Planning policies and decisions should support the expansion of electronic communications networks…"* (para. 118).

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

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

At the heart of the NPPF is the retained presumption in favour of sustainable development (para 11). For decision-taking this means approving development proposals that accord with an up-to-date development plan without delay or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless the application of policies within the revised Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed or any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the revised Framework taken as a whole.

The NPPF continues to provide guidance on decision-making. At paragraph 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"* (emphasis added).

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

> *"Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking in to account both local business needs and wider opportunities for development. The approach taken, should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation[42]"…*

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."*

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

The Code of Practice (COP) provides guidance to Code Operators (referred to as 'operators' throughout the Code of Practice), including the Mobile Network Operators and wireless infrastructure providers, their agents and contractors, local planning authorities, and all other relevant stakeholders in England on how to carry out their roles and responsibilities when installing wireless network infrastructure. It is also a useful tool for other interested stakeholders such as community groups, amenity bodies and individuals with an interest in mobile connectivity.

The aim of the Code of Practice is to support the government's objective of delivering high quality wireless infrastructure whilst balancing these needs with environmental considerations. It also has an important role in making sure that appropriate engagement takes place with local communities and other interested parties.

The Code of Practice covers all forms of wireless infrastructure development, including mobile masts and cabinets. It is recommended that other wireless communications operators follow the principles of this Code of Practice, where appropriate.

Unlike previous iterations this Code of Practice has been led by the Department for Digital, Culture, Media and Sport (DCMS) and developed in collaboration with representatives of the mobile network industry, other government departments and public bodies, local planning authorities, and protected landscapes. This document replaces the previous Code of Best

Practice on Mobile Network Development, which was published in 2016 and is now published by DCMS.

The COP sets out the legal and policy framework for the delivery of wireless infrastructure development.

Paragraph 8 of the revised Code acknowledges that connectivity is vital to enable people to stay connected and that fast, reliable digital connectivity can deliver economic, social and well-being benefits for the whole of the UK. The Code continues to acknowledge that as the demand for mobile data in the United Kingdom is increasing rapidly, and that it is important that everyone has access to dependable and consistent mobile coverage where they live, work and travel.

The Government recognises the role of Planning in delivering the digital infrastructure that we need, in a sustainable and well-designed way, especially as households and businesses become increasingly reliant on mobile connectivity.

Paragraph 13 of the Code continues to echo the NPPF guidance in strongly supporting high quality communications infrastructure, which is seen as essential for sustainable economic growth. More specifically that planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technologies (such as 5G) in order to support economic growth across the country.

The COP sets outs 'How wireless networks function'.

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

Para. 17 sets out that "*Wireless technology continues to evolve rapidly, and mobile devices are now capable of much more. Second generation (2G) technology gave us voice calls and text messages, 3G led to the launch of smartphones, and 4G, which enabled faster browsing, allowed us to do things like watching videos on the move. 5G, the latest generation of wireless technology, is much faster than previous generations of wireless technology and can offer greater capacity and lower latency, allowing thousands of devices in a small area to be connected at the same time. 5G networks, and future mobile generations, will be vital for a range of Internet of Things uses (IoT) and Smart City applications*".

The COP establishes 'Principles and commitments' by which operators should develop their networks and that Local Planning Authorities should demonstrate their support by.

Para. 18 states "*Operators should develop their networks and install wireless infrastructure according to the following principles and commitments:*

- ***Site sharing and use of existing infrastructure**: make use of existing structures, sites and masts wherever possible to reduce the need for new development. The NPPF states that, when installing mobile infrastructure, the number of masts and sites should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion.*
- ***Consultation with local planning authorities, local communities and other stakeholders**: participate in dialogue with local planning authorities, along with other relevant stakeholders such as the highways authorities, Area of Outstanding Natural Beauty bodies, Historic England, and Natural England, including pre-application discussions, where appropriate. Maintain clear procedures, and high quality communication and consultation with local communities and other interested parties. Operators should agree community engagement with local planning authorities and share information as appropriate (see Pre-application consultation with local communities below).*
- ***Standardised and high-quality approach to planning applications, and the notification procedure**: provide standardised supporting documentation for planning applications (where appropriate) within the context of national and local requirements. Ensure planning submissions are of high-quality and provide the necessary evidence to support the application (as per the NPPF).*
- ***Prompt responses to enquiries**: respond to complaints and enquiries within a timely manner (see Review and Enquiries section below).*
- ***Siting and Design**: wireless infrastructure should be deployed in accordance with the guidance set out within this Code of Practice. Where appropriate, equipment should comply with the principles set out in the NPPF and consider any local planning policies, including any local and national design codes. When located in protected landscapes and other designated land, the sensitive nature of these areas must be considered.*
- ***Removal of redundant equipment and site restoration:** ensure that when infrastructure is upgraded, any equipment that is made redundant by the upgrade, such as brackets, is removed to benefit the local environment. Where a whole site is no longer in use, the site should be restored to its original state.*
- ***Compliance with guidance laid out in the International Commission on Non-Ionizing Radiation Protection (ICNIRP) public exposure levels guidance**: as required by spectrum licences, comply with international guidelines for limiting exposure to electromagnetic fields (EMF) - including, as set out in the NPPF, providing a statement that self-certifies that ICNIRP guidelines will be met with all applications (see Annex C).*

Paragraph 19 states that Local Planning Authorities should demonstrate their support by:

- ***"Incentivising connectivity**: support the expansion of telecommunications networks and take a 'joined-up' approach to the wireless infrastructure planning process, including ensuring that Local Plans effectively support the deployment of digital infrastructure.*
- ***Facilitating sites**: engage with operators when new sites have been proposed and discuss site requirements.*
- ***Engagement with operators**: respond positively to requests for engagement and make decisions in line with national policy and Local Plans. For planning applications, find solutions to issues and ensure timely decisions are made.*
- ***Information and communication**: ensure that members of the public can access information about any development proposals within their local area. Send communications promptly to an appropriate operator contact (or their representatives)".*

The added emphasis on support from Local Planning Authorities in the deployment in digital infrastructure is even more evident in the revised 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'.*

Finally, the Code of Practice acknowledges the need for a taller lattice mast in rural area at Paragraph 29, stating: *"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".*

Siting and Design Principles

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

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

Para. 23 confirms that there should be a ***'presumption in favour of facilitating sustainable network development'*** and, as such, operators and local planning authorities, as well as all other bodies involved in the deployment process, should work together to ensure connectivity needs are met and find viable solutions to deployment issues (emphasis added).

Paragraphs 24 - 27 sets out general siting and site selection principles which Operators should consider. The COP acknowledges at Para. 24 that *'Operators use a range of sophisticated, computer-based planning tools to predict levels of signal strength and coverage from sites for 2G, 3G, 4G and now 5G. Once an operator has identified a requirement for a new cell site, a suitable site needs to be found. Elements that make a site favourable include: having existing or ready access to a power supply, access to fibre optic cables, vehicular access, and, other buildings and development which may provide a level of existing screening. Operators will typically look to upgrade existing infrastructure prior to considering a new deployment, in particular for initial 5G deployment'*.

Para 25 notes that *'When selecting sites for mobile infrastructure, operators should examine local plans and designations for the area, as well as carrying out an in-person site search to identify potential options which meet their requirements. Operators should follow these general siting and site selection principles:*

- *Installation on existing buildings and structures;*
- *Erecting new ground based masts;*
- *Camouflaging or disguising equipment where appropriate;*
- *Using small scale equipment (although small cells themselves are generally used to address capacity issues as opposed to providing coverage); and*
- *Mast and/or site sharing (including redevelopment of a site to enable upgrade or sharing with another operator)'*.

Para. 26 highlights that the installation of all wireless infrastructure requires a balanced approach between the technical needs and constraints of the proposed site and the potential impact of the development. The three key technical and operational considerations for installation sites are:

- **Coverage**: wireless infrastructure needs to provide an appropriate level of coverage over the intended geographical area. This involves ensuring that antennas are elevated sufficiently (often via masts) to provide clear lines of sight for signals.
- **Capacity:** where existing network infrastructure can no longer meet the demand for network capacity in a particular area, additional sites may be required within that coverage area to meet the demand. This is more likely to be required in densely populated areas or areas of high footfall.

- **Backhaul**: the radio access network requires a connection to the core network. Backhaul is sometimes provided by a microwave link, which requires a clear line of sight between the two ends of the link.

Para 27 requires that Local Planning Authorities consider these issues and consider the need for a site within a limited search area alongside the public benefit of improved connectivity. Para. 27 further considers that in general, it should not, therefore, be appropriate for planning authorities to seek wider evidence of alternative sites (beyond that required by the NPPF), unless they consider the proposed development is unacceptable having regard to the relevant material planning considerations.

In respect of 'Design', the COP at Para 28 acknowledges that the siting of wireless infrastructure will influence which design options are most appropriate for reducing the visual impact including

- **Protecting visual amenity**
- **Mitigating visual impacts**

Para. 29 acknowledges that these factors along with location and the coverage and capacity requirements can influence the type of infrastructure structure that is deployed and requires that '*planning authorities should be aware of these constraints when considering proposals. In particular:*

- *In urban areas, where there is a high level of demand for mobile data, mobile base stations are likely to need to be deployed more densely. In these settings you can expect to see more use of streetwork monopoles and rooftop installations and, in future, we are likely to see a larger number of smaller units (so-called "small cells") deployed on buildings and on street furniture.'*

The COP establishes radio equipment housing (cabinets) principles. The COP at Para. 30 states that "*cabinets protect radio transmitters and receivers, provide the power source for mobile equipment, and are connected to antennas via cables. Equipment cabinets are likely to be needed at most sites. The cabinets must be of sufficient size to facilitate hosting various operating equipment whilst also allowing air circulation to reduce the potential for overheating*". The COP establishes the planning and visual considerations for siting radio housing. These include:

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

- Trees

Local Policy

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that "If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise".

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

- **The Herefordshire Local Plan Core Strategy 2011-2031**

The Herefordshire Local Plan Core Strategy was adopted in 2015 and guides development and change in the county up to 2031. There are no specific telecommunications policies contained within the Local Plan. In the absence of a specific telecommunications policy, the NPPF should be consulted in this regard.

Policy SD1 relates to Sustainable Design. It states that development proposals should create safe, sustainable, well integrated environments for all members of the community, and sets out criteria which new development should incorporate, including maintenance of local distinctiveness, safeguarding of residential amenity and ensuring that new development does not contribute to, or suffer from, adverse impacts arising from noise, light or air contamination, land instability or cause ground water pollution.

Policy SS6 relates to Environmental quality and local distinctiveness. It states that development proposals should conserve and enhance those environmental assets that contribute towards the county's distinctiveness. It sets out a number of environmental components that development proposals should seek to integrate into their plans, including landscape, townscape and local distinctiveness, biodiversity and geodiversity, and historic environment and heritage assets.

Policy LD1 relates to Landscape and townscape design. It lists a number of criteria that development proposals should demonstrate in order to be acceptable, including the need to conserve and enhance the natural, historic and scenic beauty of important landscapes and features.

Policy RA6 relates to Rural Economy Employment Generation. It states that proposals which help to diversify the rural economy, including home working, will be supported.

Brockhampton Group Draft Neighbourhood Development Plan 2011-2031

The plan is at regulation 14 Draft Plan stage so can only be given limited weight. It contains Draft policies which outline how the local community would like required development to be implemented.

Whilst there is no specific policy in relation to telecommunications, Policy BROCK9: Social and community facilities states that proposals for the enhancement of existing facilities and for new provision where practicable will be supported. Para. 5.28 states: "*The household survey demonstrated the importance placed on bus services, broadband and mobile phone reception by the community.*"

Policy BROCK2: relates to Landscape character and states that development should protect and enhance the landscape character of the area by retaining, conserving, restoring and enhancing existing site features including trees and hedgerows. Also important views, vistas and panoramas should be retained, in particular Brockhampton registered park and garden, Bromyard Downs and Bringsty Common.

The Marches LEP Digital Strategy

The Digital Strategy covers the period 2020-25 and sets out the narrative and foundation for a digital future across The Marches. It lists key 'drivers' behind the rationale for the development of a Digital Strategy, including:

" *- The LEP's ambition to be a digital leader;…*
- The opportunity to build on strong existing digital assets and characteristics;…
- The chance to showcase key digital assets: observes through the lens of facilities, assets and digital infrastructure…"

The Digital Strategy acknowledges that mobile connectivity is an integral component of The Marches' digital infrastructure offer. It states "*It provides the basis for seamless communication and increasingly, access to broadband speeds equivalent to those achieved through fixed networks. It is also likely to be the bedrock of agile working across the area's expansive and diverse geographies, in the future*". Data shows that The Marches is currently falling behind the national average for mobile connectivity on indoor 4G services and indoor data services overall.

It states that it is important that The Marches is not left behind. In its Strategic Implications, the Digital Strategy states "*there is a need to continue to bridge the 'digital divide', providing equitable access to high-speed services and 4G…*"

<u>Relevant Government Reports relating to Telecommunications Development</u>

Levelling Up the United Kingdom (February 2022)

Digital Connectivity is a focus area and the mission is 'By 2030, the UK will have nationwide gigabit-capable broadband and 4G coverage, with 5G coverage for the majority of the population'. This mission is focused on improving digital connectivity.

Digital connectivity: The case for action

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

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

The policy programme

In 2020, the UK Government published the National Infrastructure Strategy, committing to providing £5bn in public funding to roll out gigabit broadband to at least 85% of the country by 2025, and subsequently to as close to 100% as possible, working with the private sector.

Public investment will target premises that are hardest to reach and which would otherwise not be provided for by the private sector, ensuring no areas are left behind. Gigabit coverage has increased from 10% to over 60% in less than two years. Since 2019, coverage has improved across the UK, and the UK Government anticipates the following additional improvements to be delivered as a minimum by 2025, as set out below.

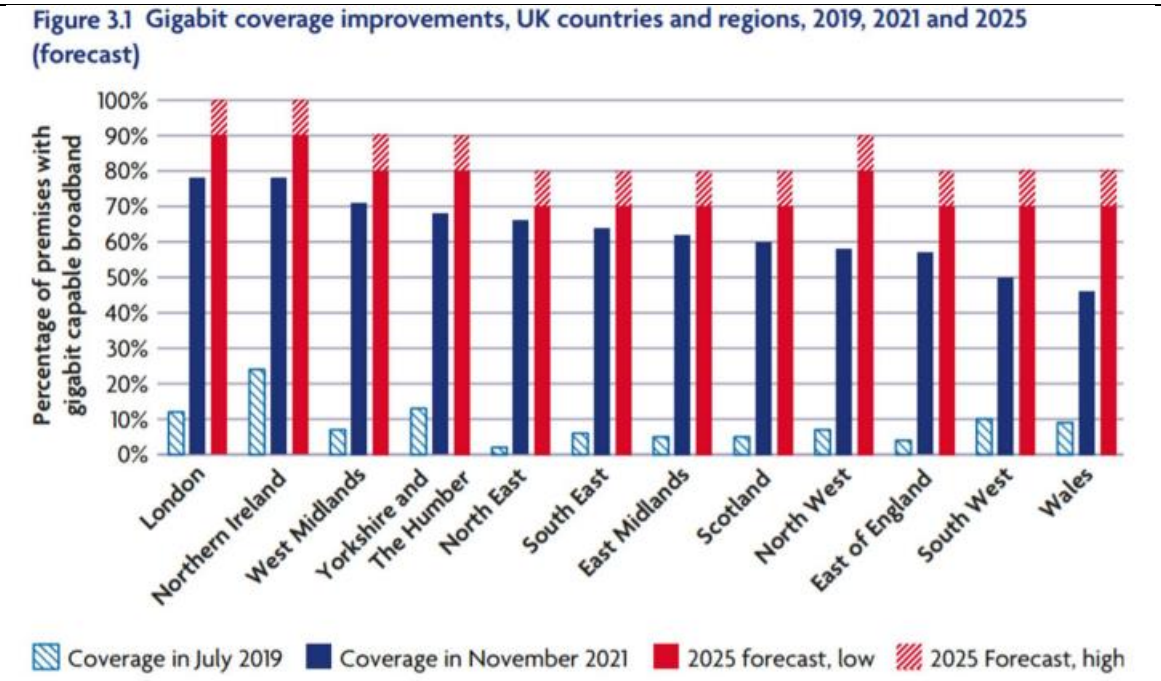

Image 3: Source: Levelling Up the United Kingdom.

Online Nation 2022

Online Nation is an annual research report, published for the first time in 2019. Using research produced by Ofcom and others, it looks at what people in the UK are doing online, how they are served by online content providers and platforms, and their attitudes to and experiences of using the internet.

The latest Online Nation 2022 report (published June 2022) found that for most people in the UK, being online is a major part of daily life. Being online allows people to connect with others, sometimes in ways they may not be able to do offline. Data shows how we benefit from a range of online services, from messaging and calling platforms to gaming platforms, online news outlets and online shopping.

The Meta-Owned social media apps (Facebook, Instagram, WhatsApp and Facebook Messenger) made up the top four smartphone apps most visited daily by UK adults in September 2021. The top-reaching smartphone app was WhatsApp (88% of UK online smart-phone using adults) closely followed by the Facebook app (87%).

94% of UK adult internet users aged 16+ said they used an online communications service for making voice/video calls or sending messages in 2021, and 80% of children aged 3-15 did the same.

The 2022 report found that the UK adult internet users spent almost 4 hours online a day in September 2021, with 3 of those hours being spent on smartphones. One in five people only use a smartphone to go online compared to one in ten last year. News and government public services are among the most-visited websites and apps in the UK.

The majority (67%) of UK internet users aged 13+ feel that the benefits of being online outweigh the risks. 43% agree that being online has an overall positive impact on their mental health.

The report found that 60% of children aged 8-15 say that using social media and messaging platforms makes them feel closer to their friends. More than three-quarters of children aged 12-15 said that being online can help with their school/homework, whilst half said it can be used to learn a new skill.

The Online Nation 2022 report acknowledged that the global pandemic since March 2020 has resulted in significant changes in online behaviour. Online shopping habits developed during the lockdown periods have remained. The largest online platforms' revenues and profits increased significantly during the lockdown periods and this growth continued in 2021. The growth is being driven by UK consumers' increased spend on e-commerce and entertainment subscription services, while advertising revenues are also increasing with the continuing brand migration to online.

Figure 1.2 of the Online Nation 2022 report indicates that the percentage of UK online adults accessing the internet, by device, in 2021 was the highest by smartphone at 88%. In September 2021 73% of the time spent online by UK adults per day was on a smartphone.

Percentage of adult internet users	Smartphone	Tablet	Laptop	Smartphone only
2021	88%	43%	53%	21%

Source: Ofcom Adults' Media Literacy Tracker 2021: Core survey and CATI omnibus survey. IN1. Which of these devices do you use to go online? (MULTI CODE) Base: All adults 16+ that go online (at home or elsewhere) (excluding those who did not give a response at the postal survey) (3577)

Image 4: Percentage of UK online adults accessing the internet, by device: 2021 Source: Reproduced from Online Nation 2022 Report

The table below (Image 5) indicates the most-missed device among adults were it be taken away from them, using data collected 2014-2019. As can be seen, nearly half of all adults say that their mobile device is the device they would miss the most were it taken away from them.

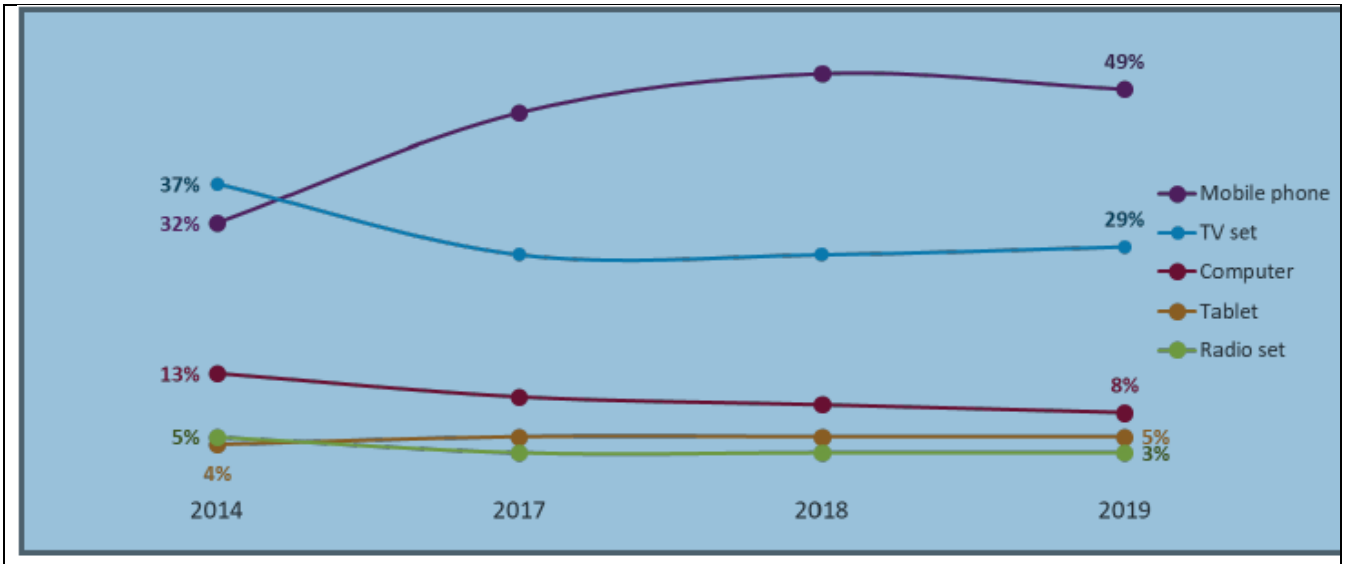

Image 5: Source: Ofcom Adults' Media Literacy Tracker 2014-2019

More people than ever now rely on their mobile phones for day to day, and even hour to hour, access to services. For example, some people use their mobile phones to monitor their health, such as diabetics. Mobile phones can be a lifesaver in that sense, just as much as being able to call 999 in an emergency.

Further to the Government's commitment to improve digital connectivity, on 04th April 2022 the new permitted development rights for telecommunication operators came into force (SI 2022 No.278). The Explanatory Memorandum to the Town and Country Planning (General Permitted Development) (England)(Amendment) Order 2022 confirms that '*permitted development rights have an important role to play in the planning system. They provide a more streamlined planning process with greater planning certainty, while at the same time allowing the local consideration of key planning matters through a light-touch prior approval process*'.

Ofcom Connected Nations 2022

The OFCOM Connected Nations 2022 – England Report acknowledges that in England 4G geographic coverage is currently at 92-94% and the UK geographic coverage is just 80-87%. In order to improve these rates, adequate infrastructure will be required.

	Northern Ireland	Scotland	Wales	England	UK
5G outside premises (MNO range)	14-26%	29-51%	10-46%	42-61%	39-58%
4G outside premises (MNO range)	98-99%	97-99%	96-99%	99%+	99%+
4G geographic (MNO range)	88-92%	57-75%	73-85%	92-94%	80-87%
4G total not spots	3%	17%	10%	2%	8%
Voice & text total not spots	>1%	10%	4%	>1%	4%

[21] The MNO ranges in this figure refer to span between the MNO with the least coverage and that with the most coverage on a given measure. For 5G outside premises the MNO range is based on our 'High Confidence' measure, rather than the 'Very High Confidence' measure which we also use in this report.

Image 6: Summary of Mobile Coverage across the UK (Source: Connected Nations)

Connected Nations update: Spring 2023

The Connected Nations update: Spring 2023 report was published in May 2023. This is the first interim update to Ofcom's Connected Nations 2022 report. It is based on mobile coverage and fixed broadband availability across the UK as of January 2023. The report acknowledges that there has not been a significant increase in coverage since the December 2022 report, but the industry continues to develop its coverage footprint.

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

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

percentage point drop in geographic not-spots since our December report, which we attribute to the SRN scheme.

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

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

Connected Nations update: Summer 2023

The Connected Nations update: Summer 2023 report was published in September 2023, and is the second interim update to the December 2022 annual Connected Nations report. It is based on mobile coverage and fixed broadband availability across the UK as of April and May 2023.

The report found that mobile coverage remains stable for 4G, with around 93% of the UK landmass predicted to have good outdoor 4G coverage from at least one operator. In terms of geographical coverage, the coverage range across MNOs currently sits at 92-95% in England, which is a 1% increase since May 2022. However, across the UK as a whole, it is currently only at 80-87% - still some way off the Government target of 95% geographical coverage for the UK by 2025.

4G coverage

Premises (outdoor) – coverage range across MNOs	May 2022	September 2022	January 2023	April 2023
UK	99-c.100%	99-c.100%	99-c.100%	99-c.100%
England	99-c.100%	99-c.100%	99-c.100%	99-c.100%
Northern Ireland	97-99%	98-99%	97-99%	98-99%
Scotland	97-99%	97-99%	97-99%	98-c.100%
Wales	96-99%	96-99%	96-99%	96-99%

Geographic area – coverage range across MNOs	May 2022	September 2022	January 2023	April 2023
UK	79-87%	80-87%	80-87%	80-87%
England	92-94%	92-94%	92-94%	92-95%
Northern Ireland	88-92%	88-92%	88-92%	88-92%
Scotland	57-74%	57-75%	57-75%	58-76%
Wales	72-85%	73-85%	74-85%	74-85%

Image 7: 4G coverage statistics (Source: Connected Nations update: Summer 2023 report)

The report also states:

"The UK Government targets for mobile include a target of 95% UK geographic coverage for 4G, and in April 2023 it published the Wireless Infrastructure Strategy where it announced a new ambition for the UK to have nationwide coverage of standalone 5G to all populated areas by 2030."

UK Wireless Infrastructure Strategy: April 2023

The UK Wireless Infrastructure Strategy was issued by the Government in April 2023, and sets out how the Government will delivery world-class digital infrastructure to all Britons over the next decade.

In the foreword by the Secretary of State for Science, Innovation and Technology, Michelle Donelan, it is stated:

"…wireless technology has transformed our world almost beyond recognition. Today, radio waves connect communities across the country not just with one another, but with the world thousands of miles beyond our shores, and the satellites hundreds of miles above our skies.

Connectivity has brough benefits for British household and British business, boosting growth, productivity, and opportunity for all. And change shows no sign of stopping…

…It is my personal mission as the Department's first Secretary of State to put Britain right at the forefront of scientific and technological progress. By bringing together world-class research and a dynamic business ecosystem, we can harness enterprise and innovation to grow the economy, driving forward the delivery of one of the Prime Minister's five priorities.

To do all this, we need world-class digital infrastructure… we have redoubled our efforts to build gigabit broadband in remote regions like Cornwall or Cumbria, together with our work to extend 4G coverage across the country through the £1 billion Shared Rural Network.

…Government will lead by example, putting wireless connectivity right at the heart of new and existing infrastructure to ensure that we do build infrastructure fit for the digital age…

…We will strengthen the infrastructure that underpins these markets, too, by managing the spectrum for the benefit of all, driving forward the rapid deployment of mobile networks…"

The Minister for State for Digital Infrastructure, Julia Lopez, also highlights the importance of connectivity in her foreword to the UK Wireless Infrastructure Strategy:

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

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

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

…Falling behind in coverage will mean falling behind in international competitiveness when it comes to the technologies of tomorrow, and failing to provide British people with innovative, life-enhancing services on secure, resilient networks."

The Executive Summary sets out the prime minister's five priorities for this Government:

"…to build a better, more secure, more prosperous future for the UK, including growing the economy, and creating better-paid jobs and opportunity right across the country, which this strategy is focused on delivering.

We can only deliver on that priority with world-class digital infrastructure. Advanced wireless connectivity will be the foundation on which we build industries, jobs, skills and services for the future, and this strategy sets out our plan to harness its potential for our economy and our society.

The next decade will see seismic changes both in terms of what wireless connectivity can deliver and how we can use it. The economic and social benefits from these changes promise to be vast, from supercharging growth to accelerating our transition to net zero. But we can only realise these benefits with concerted action from government, industry, and others. This strategy sets out our plan to do just that…"

The Executive Summary goes on to highlight that the UK Government is supporting the rural areas of the UK "*through our £1bn deal with the mobile network operators, we are supporting rural communities by ensuring that 95% of the UK landmass have 4G coverage by 2025. This currently stands at 92%.*"

The Strategy indicates why the Government that already has a high bar of digital connectivity, aspires to set it even higher. It notes that 2G and 3G mobile networks opened up a new realm of connectivity and mobile communication, but these legacy technologies are being phased out over the course of the next decade to free up spectrum for next generation networks and remove barriers to new companies entering the telecoms supply chain.

The Strategy goes on to acknowledge that:

"*4G revolutionised the way people use their mobile phones, supporting access to bandwidth hungry content on platforms like YouTube. Today, a 4G mobile phone can process data four times as fast as a 2G equivalent at the turn of the millennium.*

By building world-class, secure digital infrastructure networks, we can realise the vision we set out in our Digital Strategy for a competitive and innovative digital economy, support our vision for new technologies like that set out in the AI Regulation White Paper and deliver on our commitment to grow the economy.

…By ensuring that everyone can access the technology they need, including through specific support for rural economies by enabling applications such as agritech, we can make it as easy to start and scale up a digital business in rural Yorkshire as it is in central London."

The strategy sets out how the UK will maximise the potential of advanced wireless networks over the next decade, securing international competitiveness for the future and driving economic growth across the UK. This includes:

"*Ensuring good connectivity for all – 4G will continue to play an important role over the next decade in providing mobile connectivity across the UK. Through the Government's £1 billion*

Shared Rural Network programme it is moving further and faster to push 4G coverage to 95% of the UK's landmass."

To drive good connectivity for all the Government is taking action on reporting. It has asked Ofcom to continue to hold the mobile network operators to account through on-the-ground signal testing and to improve the accuracy of its coverage reporting through increased use of crowdsourced data. It has also asked Ofcom to consider how it can improve the accuracy of reporting of network performance levels in rural areas and for indoor coverage, to help policy makers and industry understand where coverage improvements are needed.

The Government wants rural economies to benefit from the huge benefits connectivity offers. As a result, the Government will be appointing a Rural Connectivity Champion to report to DSIT and DEFRA Secretaries of State to remove local barriers for deployment and promote digitally based innovation in rural areas.

Chapter 2 of the UK Wireless Infrastructure Strategy relates to ensuring good connectivity across rural and urban areas. It states that:

"The government's priority to build a better, more secure, more prosperous future for the UK includes a clear commitment to grow the economy, and create better paid jobs and opportunity right across the country. To do this, it is vital that people who live and work in all parts of the UK, including in rural areas, have access to good quality mobile and broadband coverage."

The Government seeks to support rural communities by ensuring that 95% of the UK landmass has 4G coverage by 2025. Currently 92% of the UK landmass is covered by a good 4G signal from at least one Mobile Network Operator, while 70% of the country is covered by all four operators.

The Government has a plan for rural connectivity which includes investing £1bn in the SRN programme to deliver 4G coverage to 95% of the UK landmass:

"This will also deliver 4G coverage on a further 16,000km of roads, with further indirect improvements over time, including a boost to 'in-car' coverage on around 45,000km of roads and we improve geographic coverage to 79% of Areas of Natural Beauty, benefitting millions of visitors every year."

The Government has also asked Ofcom to improve mobile coverage reporting, including in rural areas.

The strategy acknowledges that wireless connectivity can play a crucial role in delivering fixed broadband to the hardest to reach areas of the country. It goes on to note that world-class digital infrastructure underpins the digital economy and was worth £143 billion in 2021, accounting for 5% of the national workforce. This infrastructure provides the backbone of the

UK economy and society with ever more jobs, public services and societal interactions built upon its foundations. As growth in the digital sector is nearly six times faster than across the economy as a whole, its importance will only continue to increase as the Prime Minister's priority to grow the economy is delivered. 4G technology revolutionised the way people use their mobile phones. We have all seen the growth of streaming services, like Netflix and Spotify, and gained constant access to high quality, user-produced content for free on platforms such as YouTube, transformed the way we shop on line, travel around cities access to apps like Uber and use public services such as booking NHS appointments through apps. According to Ofcom's Communications Market Report, there are already close to 100 million mobile subscriptions in the UK, and a significant and growing number of machine-to-machine subscriptions.

The proposed equipment will be located on land at the Bromyard Town Football Club. The site is approx. 1km to the east of Bromyard town centre with access off B4203 to the north. The nearest residential properties are over 120m away to the north, there is mature hedgerow and trees on along the northern edge of the football club which separates the sites. The football ground is also surrounded by mature hedgerow on the western edge which appropriately separates the ground from the application site and access. The installation is sited immediately to the north of an existing hedgerow and mature Oak tree, and there are also mature trees to the south of the application, and dense woodland to the east and further south which will aid in screening the majority of the development and assimilating it within the wider landscape.

The site will be viewed in the context of the football ground and clubhouse, there are mature trees and hedgerow both within the site and in the wider landscape. There are also existing floodlights and telegraph poles within close proximity to the site. The site is set back 140m from the public highway and away from the football ground so will not be widely visible from public vantage points or outside the immediate vicinity of the site.

There are two existing telecommunications installations nearby, approx. 90m to the north east of the application site, these are third party operator installations. The proposed new shareable installation will allow these operators to enhance their service, and in the future may consolidate their equipment. This would minimise the overall number of telecommunications installations over time, whilst ensuring that sufficient, reliable coverage is provided to residents, businesses and visitors in this area of Bromyard.

Planning Matters

The main issues arising from this prior approval notification are whether the proposed mast and cabinets due to their scale and siting would be a visually obtrusive feature which would be detrimental to the character and appearance of the area. Whether any perceived harm would outweigh the significant social and economic benefits associated with the increased

service provision attributed to the proposal and other valid material considerations as outlined within NPPF and the Herefordshire Local Plan.

Principle of Development

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

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

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

The development therefore benefits from deemed planning permission under the GPDO, subject to prior approval by the local planning authority.

Siting

The siting of the equipment is well considered. The base station will be viewed in the context of the surrounding mature trees and hedgerow, the existing football ground and clubhouse, and the nearby vertical structures including the floodlights, existing masts and telegraph poles. The site benefits from screening in the form of mature hedgerow which surrounds the football pitch, which will aid in shielding the majority of the installation from public vantage points and prevent it from being widely visible outside of the site. The visual impact of the proposed installation will therefore be minimised in the wider locality, such as protecting the character and qualities of wider landscape. This is in full accordance with Policies SD1, SS6, LD1 and RA6 of the Herefordshire Local Plan.

The site will be accessed via the existing entrance to the football ground, off the B4203 to the north of the site. The proposed installation is set from the public highway and residential properties, it is also a significant distance (over 90m) away from the existing masts in the football ground, this separation distance helps to prevent the cluttering of the landscape.

The siting of the proposed installation within an existing hedgerow and mature Oak tree to the south, measuring up to 13m in height, which will screen the equipment and lower sections of the tower and reduce the visual impact of the installation. This is in full accordance with guidance outlined in the Code of Practice for Wireless Network Development in England:

"Placing a mast within or adjacent to an existing group of trees, vegetation and other natural features can reduce visual impact. Care should be taken to minimise the unnecessary loss of existing trees, though antennas will need to be sufficiently elevated to clear the tree-line…"

The application is supported by an Arboricultural Impact Assessment dated July 2024 included within the submission. The report states that the hedgerow requires minor pruning to allow for the installation of the proposal, and concludes that the development retains the site's principal arboreal features with a good spatial relationship and recommends precautions to be followed to ensure the trees are retained in good condition.

This proposal, coupled with the ability to consolidate nearby existing masts in the future, has the potential to make an overall improvement to the visual amenity of the area by condensing the likely future number of telecommunications sites to one single installation, which is fully in line with national planning policy and guidance.

Appearance

The design has been dictated by the need for the structure to host a number of operators' equipment. As acknowledged in the Code of Practice, *"larger, lattice-type structures"* are often required to accommodate this.

The lattice style structure allows light to pass through it which minimises it's visual impact, particularly in long views. This design therefore minimises the impact on the character and appearance of the surrounding area in comparison with more solid column installations, in accordance with Policies SD1, SS6 and LD1 of the Local Plan.

The Code of Practice also acknowledges the need for a latter lattice mast in rural areas at Para. 29, stating *"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 maximum height of the proposed mast at 25 metres is the absolute operational minimum to allow the antennas to clear surrounding vegetation. It is a simple lattice design in neutral colours (grey mast and green cabinets) to blend with background of the usual grey skies and green nearby vegetation. However, these can be coloured any other colour should the Local Planning Authority consider an alternative would be more appropriate.

The proposal presents an opportunity for a shareable telecommunications structure, where mobile operators can install equipment on a neutral host's mast, rather than on a competitor's mast, which is currently rarely undertaken in the UK. There is a high demand for

mobile services in this area, as shown by the supporting cumulative drive test analysis, indicating that overall there is an overwhelming fair/poor mobile coverage. As such, the provision of a shareable site will help to improve this and to ensure that there is a reduced need for existing and proposed masts elsewhere in the cell area in the future.

It has been demonstrated that the site has been chosen as the most suitable option. Enabling an installation of telecommunications equipment on one single mast, and helping to ensure that the area can benefit from high quality network coverage and service provision from a number of operators, is fully in line with national policy.

The proposed mast is a neutral, third party structure, which eliminates reluctance to mast share by the competing Mobile Network Operators. It is open to any operator wanting to host their equipment on the mast, including smaller essential network providers (subject to the standard legal agreements being in place). Over time this aims to reduce the overall number of masts in the wider cell area.

Economic and Social Benefits

The NPPF strongly supports sustainable development, as does the Herefordshire 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 the Local Plan and the aspirations of The Marches LEP Digital Strategy.

In such instances, as described above, the NPPF supports development that improves the economic, social and environmental conditions in the area. The provision of a new shareable structure in this location will fully meet this national policy objective.

Mobile connectivity is essential to the future success of the economy. Mobile connectivity is essential to creating a better society. Digital inclusion can help people gain employment, become more financially secure and improve health and well-being. Mobile connectivity is essential to fulfilling the potential of new technologies. Innovations such as artificial intelligence and connected cars will change how we work, spend our leisure time and run our public services.

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

Paragraph 38 of the revised NPPF states that:

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

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

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

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

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

Further to the Government's commitment to improve connectivity, new permitted development rights have come into force for telecommunication operators, designed to lift the restrictions on mobile operators such is the significance and weight the Government place upon the benefits attached to modern connectivity.

A National Needs Assessment – A Vision for UK Infrastructure was also published in October 2016. It sets out the infrastructure needs for the UK which includes the importance of digital technology. An extract of this assessment can be found below:

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

The Assessment goes on to note that '*Universal digital connectivity would serve as an equaliser of economic opportunity in that it enables participation in a modern digital economy*'. Therefore this Needs Assessment further explains the consequences of a lack of coverage and the effects this has on social and economic prosperity. This clearly highlights the importance of providing the adequate infrastructure for high quality digital connectivity.

The Government's continued strong support for connectivity is further evidenced by the DCMS who launched their UK wide Digital Connectivity Portal on 20 December 2018. The Digital connectivity portal provides guidance for local authorities and network providers on improving connectivity in local areas. The Government wants everyone in the UK to benefit from world-class connectivity no matter where they live, work or travel. The Future Telecommunications Infrastructure Review outlines a package of measures to create the right market and policy conditions to deliver world-class connectivity for citizens and businesses. The proposed installation will allow operators and network providers to share one robust installation, reducing the time it takes to roll out new and enhanced services in this area.

Summary

As this is a prior approval application, the Government confirms that this is permitted development, akin to outline planning permission, with just the finer details of siting and appearance to be considered by the local planning authority.

Taking into consideration all of 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 mast at 25 metres is the absolute operational minimum to allow the antennas to clear surrounding vegetation.

Site selection was progressed in accordance with advice in the NPPF and the Code of Practice and represents the least environmentally intrusive, technically suitable, available option.

The siting of the proposed shareable radio base station has been carefully considered. The site benefits from screening from the surrounding hedgerow and also from the adjacent mature trees. It is viewed in the context of the existing football ground and clubhouse building to the east. The numerous nearby vertical structures including, the existing nearby floodlights, telecommunications masts, and telegraph poles with associated overhead lines, all help assimilate the development to the site. The lattice style structure allows light to pass through it which minimises it's visual impact, particularly in long views. The proposed installation due to its siting will not be widely visible outside the immediate vicinity of the site or from public vantage points, and will therefore not detract from the character of the area.

It has been demonstrated that the proposal complies with the relevant policies outlined in the Herefordshire Local Plan Core Strategy. The social and economic benefits of providing continued reliable and high quality mobile broadband connections support sustainable growth, meeting the needs of the population and strengthening global competitiveness. This is fully supported by the NPPF and the aspirations of The Marches LEP Digital Strategy. These benefits are strong material considerations which outweigh any perceived visual harm to the surrounding area.

We confirm that submitted drawings have been checked for accuracy.

Name: (Agent)	Rachel Gormley	Telephone:	07999 834 759
Company:	Perry Williams on behalf of Icon Tower Infrastructure Limited		
Company Address:	Adamson House, Towers Business Park, Manchester, M20 2YY	Email Address:	rgormley@perrywilliams.co.uk
Signed:	RGormley	Date:	26/07/2024
Position:	Consultant Town Planner	(on behalf of Icon Tower Infrastructure Limited)	