SITE SUPPLEMENTARY INFORMATION

1. Site Details

Site Name	Nurdens Garden Centre	Site Address	Nurdens Garden Centre Festival Way St.Paul Makmesbury Without Melbourne Wiltshire SM16 9GN
NGR	E: 394157, N 188443		
Site Ref Number	WIL0005	Site Type[1]	Macro

2. Pre- Application Check List

Site Selection (for New Sites only)
(would not generally apply to upgrades/alterations to existing sites)

Was Wiltshire Council mast register available to check for suitable sites by the operator or the local planning authority?	~~Yes~~	No
If no explain why: The Ofcom database was not used as the proposal is for an upgrade to local nearby cells which are able to be consolidated on to the new Icon Tower mast in due course.		
Were industry site databases checked for suitable sites by the operator:	~~Yes~~	No
If no explain why: The Industry databases were not used as the proposal is for an upgrade to local nearby cells which are able to be consolidated on to the new Icon Tower mast in due course.		

Pre-application consultation with Wiltshire Council

Date of written offer of pre-application submission:	1st December 2023	
Was there pre-application contact:	YES	~~NO~~
Date of pre-application contact (meeting / response / e mail):	N/A	
Name of contact:	Email issued to the Local Planning Department.	
Summary of outcome/Main issues raised: The pre-consultation invited comments within a two-week period and while the merits of high-speed telecommunications are generally recognised; pre-application has identified the need to carefully consider the risk of increased visual amenity to the surrounding area through the siting of telecommunications infrastructure within urban settings. The e-mail communication included a set of planning drawings, site information sheet and an explanation behind the requirement for a new telecommunications installation. The information sheet also included other sites that have been investigated and discounted. Further details of the discounted sites are included within this document.		

[1] Macro or micro

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline Consultation carried out: In accordance with the Code of Best Practice this site has been given a rating of Amber. Existing installations which are being removed as part of this development in the same area, therefore the principle of telecommunications equipment has been established in this area. The proposal is consolidating equipment on to one single shareable mast, a relatively short distance away from the existing site(s).			
Summary of outcome/Main issues raised: Determination as to whether the prior approval of the authority will be required to the siting and appearance of the proposed installation is invited under Part 16, Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended, as well as the objectives of the National Planning Policy Framework (February 2019). It is our opinion that the proposed design presents a suitable balance within the local community and immediate and wider area, offering a reduced visual impact upon an area which is situated out with a conservation area or other such restrictive designation. It is considered that the design and siting, accords with Local Authority's critical role in delivering the UK Government's Digital connectivity vision and provides a basis for the local planning authority to support the request for plans to speed up digital infrastructure rollout set out by Ministers on the 27th August 2020.			

School/College

Location of site in relation to school/college include the name of school/college: No relevant educational establishments have been identified within 300 metres of our proposed development.
Outline of consultation carried out with school/college (include evidence of consultation): As above, no education establishments have been identified within the vicinity of our proposed development.
Summary of outcome/Main issues raised: N/A

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

Will the structure be within 3km of an aerodrome or airfield?	Yes	~~No~~
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	~~No~~
Details of Response: Chartlon Park Airfield shows to be approximately 1.2km away from the proposed location. However, to the best of our knowledge, no response was received.		

Developer's Notice

Copy of Developer's Notice enclosed	Yes	~~No~~
Date Served:	13th December 2023	

3. Proposed Development

The proposed site:

About Icon Tower Infrastructure Ltd (Icon Tower)

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

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

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

Icon Tower is committed to the responsible development of wireless infrastructure. Alternative locations are assessed based on strict Town Planning criteria (visual amenity, impact on the local community), balanced against the physical requirements of the mast (radio plan coverage, backhaul line of sight, power and road access). We operate in accordance with the Code of Best Practice on Mobile Network Development (Nov. 2016).

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

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

UK Government Policy on Mobile Infrastructure Deployment.

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

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

In June 2022 the Department for Digital, Culture, Media and Sport (DCMS) issued an updated UK Digital Strategy (UK Digital Strategy) with the goal of ensuring that the UK "will be the best place in the world to start and grow a technology business". The strategy focuses on the following key strands:

- Ideas and intellectual property (IP)
- Skills and Talent
- Financing digital growth
- The whole UK: spreading prosperity and levelling up
- Enhancing the UK's place in the world

In conjunction with the new Electronic Communications Code (2018), the DCMS wishes to make it easier for operators to upgrade and share their equipment with other operators to help increase coverage. The DCMS also sees new technology and improved connectivity and coverage as key to the future growth, both socially and economically, of the UK.

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

Description of the Site

The proposed site is located off Festival Way, within Wiltshire. This can be seen in Figure 1. It is clear the surrounding area is rural which is not within immediate view of residential dwellings. In our opinion, this has no significant negative effects on the area's amenity or its near surroundings. The location gives the proposed monopole a natural backdrop, making it appear neither out of place nor obtrusive. Commercial buildings such as Aldi and Malmesbury Garden Centre, are within close proximity however no visual impact will be made upon the local area.

It is also important to acknowledge that the proposed mast, has been kept to a minimum in height whilst providing the best technology for the area. The development has been positioned near users in order to meet operational needs, but it has also been placed away from densely populated regions in order to prevent the project from being aesthetically invasive. The nearest dwellings show to be approximately 400m away. Additionally, the development's impact would be maintained to a manageable level due to the site's distance from more sensitive users.

Figure 1 – An image to show the proposed location (indicated by the red marker) of the telecommunications mast at Oxford Road, Beedon, West Berkshire, RG20 8SJ. Image taken from Google Maps.

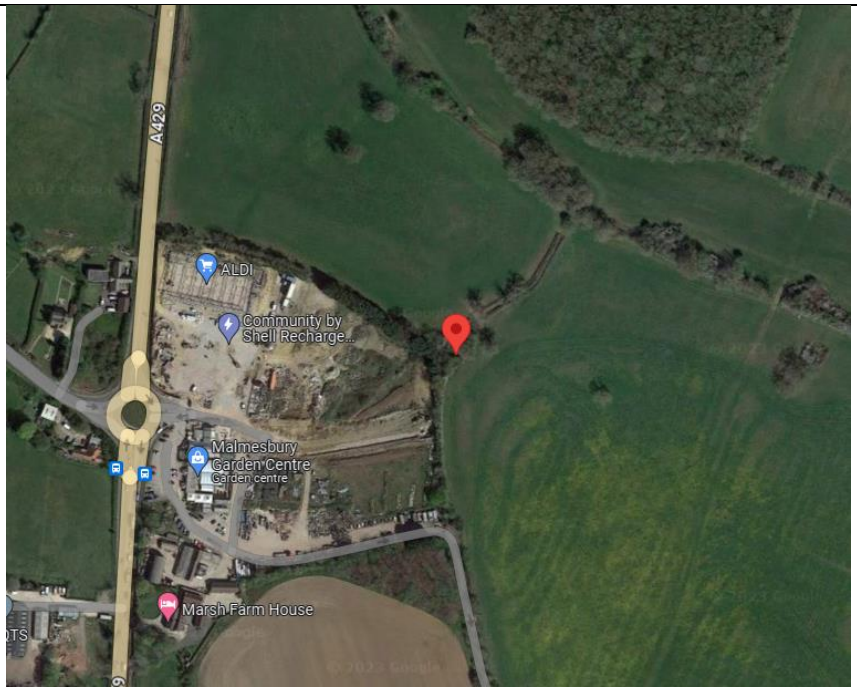


Figure 2 – An image to show the streetview image of the proposed location at Oxford Road, Beedon, West Berkshire, RG20 8SJ.



Proposed Development

The installation of 30m high lattice tower within a fenced compound as shown on the attached drawings. The development will include a base station, 2.4m high fencing compound, 6no. operator cabinets, 4no. dishes, 12no. antennas, 1no. meter cabinet and ancillary development thereto, as shown on the attached drawings.

The technical details of this proposal are illustrated within application design drawings as attached.

There is an acute need for a new base station at this location to provide effective service coverage to the local area.

Type of Structure:	Lattice Tower
Height:	30m
Antenna	See drawings
Equipment Housing	See drawings
Equipment Housing Colours	See drawings
Column/mast etc:	See drawings
Fencing	See drawings

Reasons for choice of design:
Code of Best Practice on Mobile Phone Network Development in England (2022) states:

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

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

- The proposed mast is the lowest height in which the Operators can continue to provide the required level of coverage to the target area. Following liaison with the planning officer, it was decided that a lattice was best suited to this particular site as it assimilates itself within the rural environment, because the lattice structure allows to 'see through'.
- The proposed mast is suggested to remain galvanised in order to assimilate the typical sky colour in the UK, however the Applicant is open to suggestions from the LPA if they feel that there are any other suitable RAL colours to paint the mast.

For the base station to effectively provide coverage to the target area in line with the established network pattern, specific antenna orientations and heights, determined by Network Radio Planners, must be achieved. The mast height is determined by features of the surrounding area such as existing buildings and trees, the antenna must be able to 'see over' any obstructions in order that they do not block the signals from the antennas. To achieve operator's upgrade requirements the maximum height of the proposed antennae on the mast will be 26.8m. The size is determined by the technological requirements by the Operator, in order to provide the reliable signal with greater capacity, reliability and lower latency. The antennae are to be finished in the standard light grey finish, which matches the existing antennae on the installation and help reduce prominence when viewed against the sky.

The proposal is to locate a proposed shared infrastructure which will have multiple operators on the mast. This will help reduce the proliferation of masts in the environment, and therefore will have less adverse visual impact on the landscape.

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

4. Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below) *. International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines. 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.	Yes

5. Technical Justification

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

Reason(s) why site required e.g., coverage, upgrade, capacity:
The existing masts within the locality cannot support the necessary upgrades. For legal reasons, it is not possible to take the existing mast down, however, to prevent the proliferation of masts Icon Tower has decided to co-located the mast nearby an existing one. The proposal has the capability for upgrades and the ability to host new and antenna systems and preparing the site for future innovations in telecommunication equipment.

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

The applicant's site selection strategy is to keep the overall environmental impact to a minimum. Utilising existing masts is always progressed where it is technically and legally possible. New sites are only developed where there are no viable or accessible alternatives. The feasibility of the build and maintenance of the site also needs to be considered.

Improvements in telecommunications technology has led to the existing sites nearby becoming unsuitable for Icon Tower, as existing structures cannot support the required upgrades to the existing telecommunications systems. To allow for these upgrades as well as future proofing the site for other potential telecommunication innovations Icon Tower has deemed it necessary to construct a new mast with additional capacity. The 30m in height is required to ensure none of the existing operators lose coverage as the antennas have to be relocated on to two new headframes on the proposed mast. The proposed height is also required to "see over" nearby trees and built form which are particularly problematic when broadcasting signal.

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

As referred to above, the applicant has taken a sequential approach. It is considered that developing a multi-user, sharable lattice tower on a site co-located with an existing one is the best option, as this avoids the proliferation of masts in the environment.

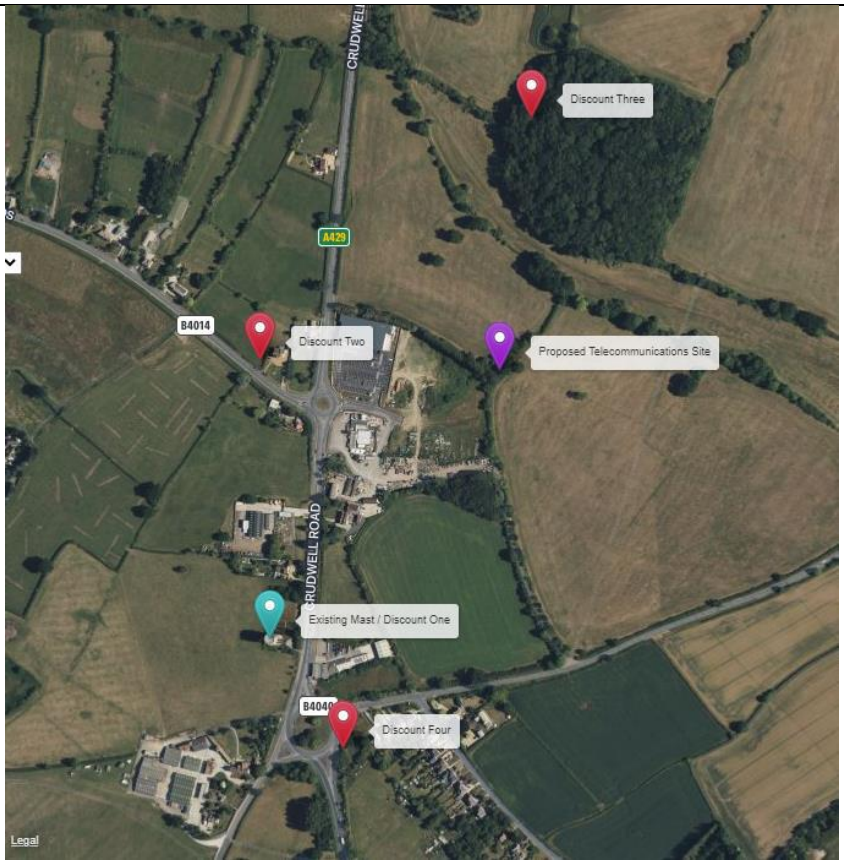
It should be noted that the proposed development is proposing to in time replace existing installations on existing masts which is in full accordance with the Code of Practice for Wireless Network Development in England (2022) and Code of Best Practice for Mobile Phone Network Development in England (2016).

Discounted Options

Table 1 – A table to show the discounted options and why they were not selected.

Site	NGR	Discounted Reason
D1 – Malmesbury Water Tower	393877, 188118	The existing telecommunications equipment on Malmesbury Water Tower was initially investigated for potential site sharing however, due to the extent of equipment proposed it was deemed the mast did not have the structural capacity to support the works in the attached planning drawings. Furthermore, in order for the mobile operators on both masts to achieve operational requirements a much taller mast would be required, leading to a significant visual impact.
D2 – Open Field by the B4014	591158, 174859	The open field located on the B4014 is discounted due to the close proximity to residential housing which is likely to be unfavourable to both, the local community and Wiltshire Council. Additionally, the site has limited accessibility and in order for assembly and routine maintenance a larger access track would be required leading to a loss of visual amenity.
D3 – Crudwell Road Forest	499197, 165960	The forest by Crudwell road is discounted due to inaccessibility. It is not feasible for the required vehicles to access the site during assembly and routine maintenance. Additionally, in order to allow for the installation significant tree felling would be required which is unlikely to be favourable and the exposed site would like to a significant visual impact.
D4 – Charlton Road Roundabout	499024, 166281	The grass verge at the roundabout adjoining Charlton Road is discounted due to visibility concerns from vehicles joining the nearby junction. Furthermore, there is a steep slope moving towards the M3 posing build and assembly concerns. It should also be noted that during assembly and routine maintenance it is anticipated to require a road closure would be required and due to the significant traffic this road experiences it would not be feasible.

Figure 3 – Location of the discounted sites



Additional relevant information (planning policy and material considerations)

National Planning Policy Framework (2023)

The latest version of the government's National Planning Policy Framework (NPPF) was published in September 2023. The Government's policy strongly supports communications infrastructure. Paragraph 114 of the framework document sets out the objectives of the Communications Infrastructure. It states that: "*Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. 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; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).*"

It goes on to acknowledge that the numbers of radio and telecommunications masts and the sites for such installations should be kept to the minimum consistent with the efficient operation of the network. Paragraph 116 indicates that local planning authorities should not impose a ban on new telecommunications development.

NPPF paragraph 118 sets out a clear message to local planning authorities on health issues and the need for telecommunications systems. It 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* ".

Throughout the NPPF there is strong support for sustainable development which is summed up in paragraph 10 which states '*At the heart of the Framework is a presumption in favour of sustainable development'.*

<u>Code of Best Practice on Mobile Phone Network Development in England (2022)</u>

The Code of Best Practice provides guidance primarily to mobile network operators, their agents and contractors and to local planning authorities in England. It is also useful guidance in Northern Ireland, Scotland and Wales too.

The principal aim of this Code is to ensure that the Government's objective of supporting high quality communications infrastructure is achieved in a timely manner, but in a way, that also minimises the potential impact that can be associated with such development. It provides clear and practical advice to ensure the delivery of significantly better and more effective communication and consultation between operators, local authorities and residents.

The Code highlights that the mobile telecommunications network is a key element of national infrastructure in both economic and social terms and a crucial component of everyday life. It states that "coverage *in rural area is recognised as a vital component for maintaining economic activity and social inclusion*". It acknowledges that the pressure on networks to upgrade and improve networks through changes to existing sites and the development of new sites is constant. With the ever-increasing demand and the Government's ambitious aspirations it is becoming more important to improve connectivity and capacity.

Concerning the erection of new ground-based masts the Code provides examples of where the environmental and visual impact of the mast can be greatly reduced.

- *Placing the mast near similar structures. For example, industrial and commercial premises, road signs and lamp posts*;
- *Placing a mast within or adjacent to an existing group of trees. 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 and the trees may need to be maintained to prevent growth above a certain level.*
- *Using simple and unfussy designs. Masts which have complex designs are more likely to dominate and be in discord with the landscape and have adverse visual impacts; and*
- *Appropriate colouring. Masts seen against the sky, for example, are best left in their galvanised state or painted pale grey. Against a wooded backdrop a matt green or brown colour scheme would be more applicable.*

The proposed mast completely supports the National Policies of all four UK Nations by allowing numerous future operators to share one single site, keeping the network to a minimum. The proposed mast has been sited on the land which is next to the A429. The proposed mast is co-located near an existing mast and has been intentionally sited near trees which offer a great level of screening, particularly at the base and lower portion of the mast.

UK government policy on mobile infrastructure deployment

The UK government has identified the need for greater investment in mobile infrastructure to increase the widespread availability and capacity of mobile voice and data networks.

"The Government acknowledges that there has been a profound shift over the last decade in the way citizens approach and access digital communications. What was once seen as a luxury is now a basic need, and people expect to have access to fast broadband at home, irrespective of where they live, and use their mobile devices anywhere they go". DCMS, May 2016.

The last few years have seen a number of UK-wide initiatives to improve coverage including:

- Coverage commitments in the 4G LTE spectrum awarded to Telefonica O_2 (February 2013) to deliver mobile broadband with 98% indoor premises coverage by the end of 2017
- National commitment by all four MNOs (December 2014) to deliver 90% geographic coverage by 2017
- Mobile Infrastructure Project (MIP) – investment by DCMS of up to £150m (to March 2016) in towers to deliver connectivity in complete mobile not-spots.

- Changes to the Permitted Development rights afforded to communications code operators (such as Icon Tower) to allow new networks to be rolled out more efficiently.
- Changes to the Electronic Communications to Code (December 2017) to allow mobile operators to more easily roll-out new communications infrastructure.

Local Policy

The relevant Local Plan against which the application will be determined is the Wiltshire Core Strategy (Adopted January 2015). The local plan was reviewed and highlighted reference to telecommunications.

Key outcomes

- Provision of essential infrastructure, including transport, water, energy, flood alleviation, sustainable urban drainage (SUDs), telecommunications, affordable housing, education, health care, emergency services and waste and recycling, will have been coordinated and provided in a timely manner within all new development.

4.38 In addition to managing the provision of the new infrastructure requirements of development proposals, the individual investment plans of infrastructure providers should be recognised and fully considered. It will be important that all new development proposals build safeguards into schemes to protect and enhance appropriate services and facilities, including: bus corridors, telecommunications equipment (particularly high speed broadband infrastructure), electricity power lines, high pressure gas mains, educational facilities, health facilities, flood protection measures, water treatment infrastructure, waste water treatment works and waste collection and management services. Developers proposing to connect to a waste water treatment works will need to check with the utilities provider that there is adequate capacity. Development in areas with no mains foul system will need to ensure that there are suitable options available for sewage disposal.

- Wiltshire Core Strategy (Adopted January 2015)

This policy sets out a number of criteria which have been met in order for a development proposal to be considered acceptable including: the siting and appearance of the proposed development being positioned within a field, which is not within proximity to residential properties and has abundant screening, ensuring that the visual amenity, character and appearance are maintained. Furthermore, the proposed works are not deemed to affect the overall character of the area and thus we believe our proposed development is in compliance with local policy.

Application Summary

The development has been designed to be compliant with national and local policy. The proposed location is deemed the best suited as there is already the principle of development in the area due to the presence of existing masts.

Consideration has been given to the future demands of network development as them mast will be capable of carrying upgrades and will facilitate the provision of high-speed broadband in the area. Additionally, the proposed development has reduced the possibility of criminal damage such as vandalism has been reduced by the erection of a 2.4m high fence, limiting the ability for anti-social behaviour giving the site a better sense of safety therefore reducing the fear of crime within the locality.

Size, scale, massing, orientation, materials and appearance have all been considered during the design process. The applicant is also allowing the LPA to suggest any alternative RAL colours of the mast structure, fencing and cabinets. The 30m height is required in order to provide coverage to the required cell area. A lattice tower was chosen as best design choice, as it suits the topography and industrial sector of the area. Visual impact has also been reduced by the choice of colours and materials for this development, for example the galvanised finish helps the mast blend with the sky, and the nature of the mast structure is a straightforward and minimal design which will assimilate with the immediate and wider surrounding, reducing the visual prominence where it does break the skyline. However, the applicant welcomes any suggestion of colour that the LPA deems most appropriate. Placing the proposed beside trees is in accordance with the Code of Best Practice on Mobile Phone Network Development in England (2022).

There is a high demand for telecommunications in the area, and the proposed development will help facilitate that requirement.

The National Policy and the recent correspondence from Government ministers to local authorities clearly highlights the government's positive stance regarding telecommunications and broadband development whilst noting the substantial environmental and social benefits telecommunications can provide. We acknowledge that the authority accepts the importance of telecommunications infrastructure and the NPPF guidance. The proposal upgrades telecommunication allowing more and better services to be provided from this tower. This is an important consideration in balancing the importance of the telecommunications infrastructure, against visual impact in line with local and national policy. Visual impact will be minimal, particularly when viewed in the context of what is currently in-situ at the site.

Conclusion

Taking into consideration all the relevant factors set out above, it is considered that this proposal is the optimum solution in terms of enhanced provision from a single site for multiple operators, minimising any adverse impacts on local amenity. The maximum height of the proposed antennas at 28.8 metres is the absolute operational minimum to clear the immediate environment and provide coverage.

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

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

Contact Details

Name: (Agent):	Kavita Bhopal DOT Surveying	**Telephone**	
Signed:		**Email**	k.bhopal@dotsurveying.co.uk
Position:	Planner	**Company**	Dot Surveying Limited (on behalf of Icon Tower Infrastructure Limited)
Address	Office 52, Zenith House, Highlands Road, Solihull, B90 4PD	**Operator**	Icon Tower Infrastructure Limited