

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	HOOK	Site Address:	Midge Hall Nurseries, Wootton Bassett, Swindon, SN4 8ER
National Grid Reference:	E: 407654 N: 184178		
Site Ref Number:	CS 12393623	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:		
Upgrade to existing base station		
Were industry site databases checked for suitable sites by the operator:		No
If no explain why:		
Upgrade to existing base station		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	No
Date of pre-application contact:	N/A
Name of contact:	N/A
Summary of outcome/Main issues raised:	
A pre-application consultation letter, a consultation plan and a set of proposed plans were sent to the Chief Planning Officer for the Local Planning Authority via email, dated 06/02/2026.	
No comments were received to date	

¹ Macro or Micro

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Registered Address:
Cornerstone Telecommunications, Infrastructure Limited,
Hive 2, 1530 Arlington Business Park, Theale, Berkshire, RG7 4SA.
Registered in England & Wales No. 08087551.
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Annual area wide information to planning authority

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

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline of consultation carried out:			
Pre-application consultation letters and sets of proposed plans were sent to the local ward councillor for Charlestown Ward (Councillors V. Kirkpatrick, B. Curley and H. Priest) and the Parish Clerk for Lydiard Tregoze Parish Council via email, dated 06/02/2026. A pre-application consultation letter and a set of proposed plans were sent to the local MP for Chippenham (MP Sarah Gibson) via email, dated 06/02/2026.			
Summary of outcome/main issues raised (include copies of relevant correspondence):			
No comments received to date.			

School/College

Location of site in relation to school/college (include name of school/college):
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No schools nearby.
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 or the operator of the civil safeguarding area or defence safeguarding area notification (only required for an application for prior approval)

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

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	Developer's notice, covering letter and site plans were sent to the landowner on 19/02/2026 via Email. Notice and proof of delivery attached as part of this application.	

3. Proposed Development

The proposed site:
Background:
Cornerstone is the UK's leading mobile infrastructure services company. They acquire, manage and own over 20,000 sites and are committed to enabling best in class mobile connectivity for over half of all the country's mobile customers. They oversee works on behalf of telecommunications providers and wherever possible aim to: • promote shared infrastructure. • maximise opportunities to consolidate the number of base stations.

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- significantly reduce the environmental impact of network development.

As part of Cornerstone's continued network improvement programme, there is a specific requirement for a new radio base station at the land at Midge Hall Nurseries to provide improved 4G coverage and capacity and new 5G technology, ensuring that this area of Wootton Bassett continues to have access to the latest technologies. This is in line with its legal obligations, as well as the Government aspirations for the UK to be a world leader in 5G.

3G (and eventually 2G) has been switched off by the operators in order to repurpose these radio frequencies for faster more energy-efficient 4G and 5G services. 3G was primarily used for mobile data services. It has been switched off first because it has already largely been superseded by 4G. Hence the importance of providing the latest 4G and new 5G service provision in areas where there is no such coverage. As a result, it is imperative that the operator builds resilience into the network.

5G service provision is not just about coverage, it is about capacity through the many layers of technology the operator provides to their customers to deliver a better-quality experience, greater data speed upload and download, as opposed to waiting for a file to download or a map to get from A to B (on the network) due to congestion.

To keep up with growing demand the operators need to upgrade existing base stations or build new base stations to improve the capacity. Capacity is the maximum data or calls that can be processed by a base station. When capacity is exceeded, users may experience slower internet speeds, dropped calls, or difficulty connecting to the network. Upgrading or expanding infrastructure helps ensure the network can handle increasing usage demands, providing reliable service for both current and future needs.

Planning History

PL/2023/09107 – Prior notification. Proposed removal and replacement of existing 12.0m high CU Phosco K3 monopole and existing 3No. antennas with proposed 17.5m high CU Phosco Monopole c/w 4.9 headframe and proposed 3No. antennas and 1No. GPS Node. Existing 300a dish to be relocated to proposed monopole. Existing Equipment Cabin to be upgraded internally and associated ancillary works – approved on 14/12/2023.

Prior approval was granted on 14th December 2023 to replace this site with a similar design. See figures 1 and 2 below for the changes in design compared to this proposal. Since the previous approval, there have been greater demands on the operator's network and the previous design is not capable of hosting all of the latest

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technologies, therefore the site has been re-designed slightly to host more ERs and it has changed position slightly by a few metres. This is due to the existing root foundation not being strong enough to support the new structure. The site will be seen in the same context as before, due to its siting remaining within the existing compound and will not have a profound effect on the surrounding areas.

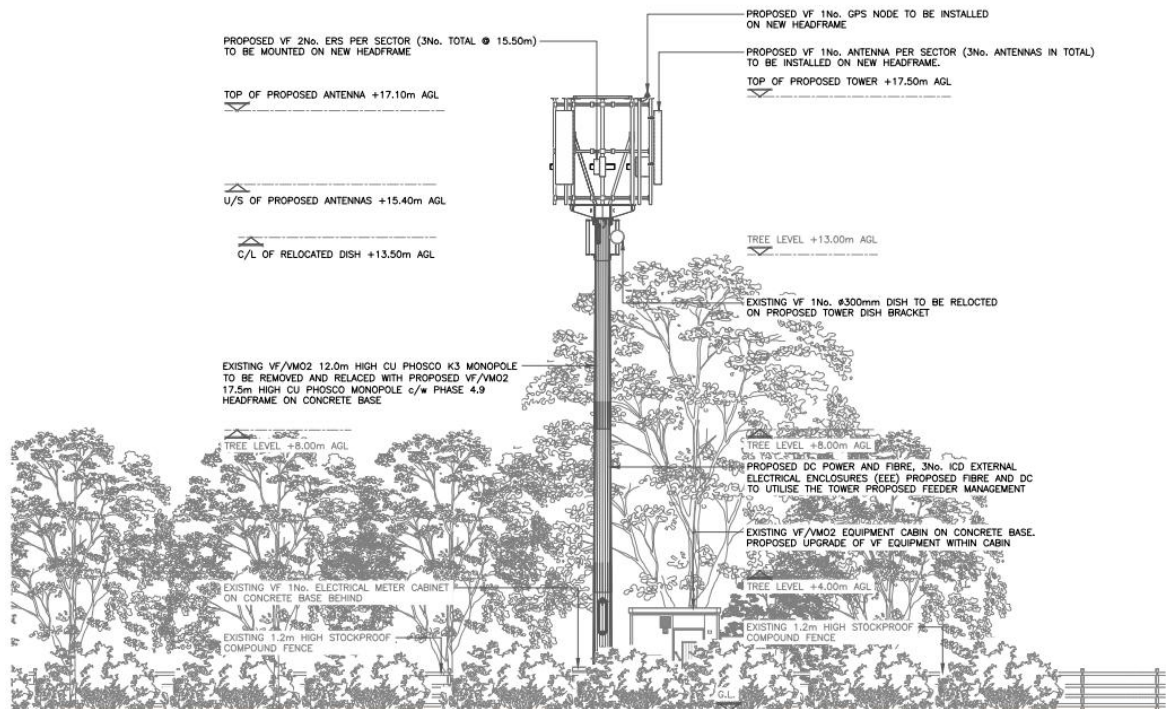


Figure 1. Approved Plans under LPA ref: PL/2023/09107

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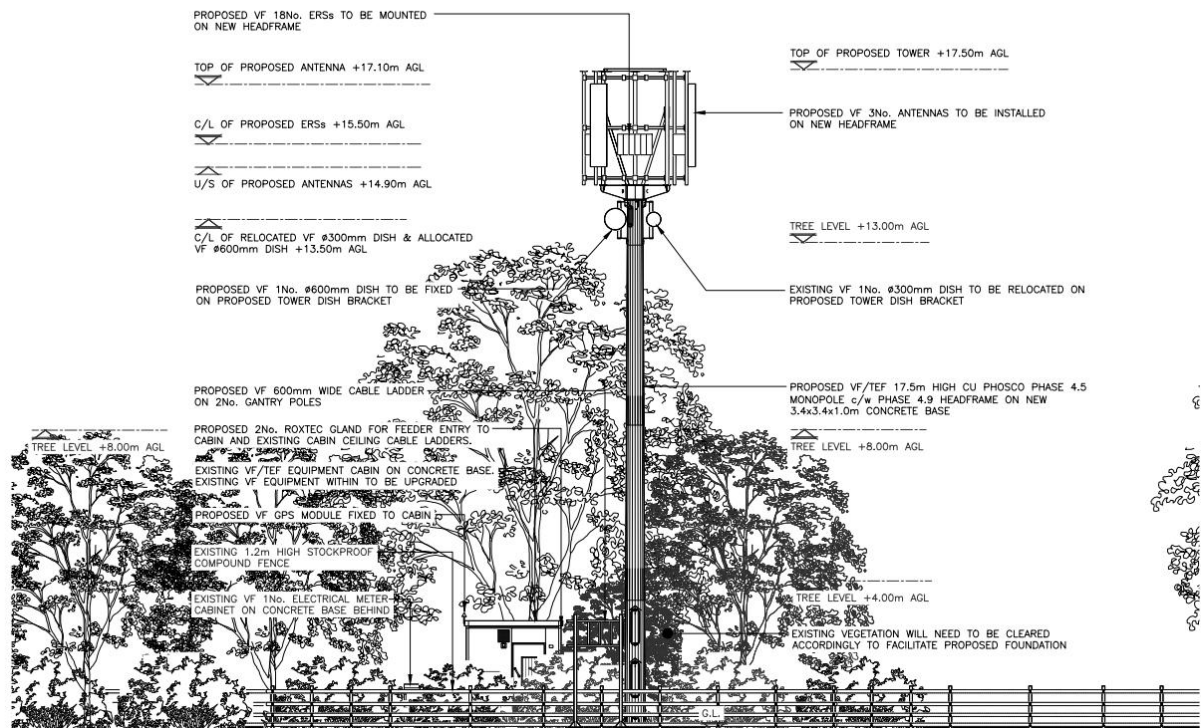


Figure 2. Revised Plans Under This New Prior Approval Application

Proposed Development

The proposed works comprise the removal of existing 12m monopole supporting 3 no. antennas and the installation of a new 17.5m monopole supporting 3 no. antennas on an open headframe, 1 no 300mm transmission dish, 1 no. 600mm transmission dish and ancillary development there to including 18 no. Ericsson Radio Systems (ERSs).

The site is situated in a field immediately south of the M4 and approximately 240m north of Marsh Farm Bungalow. It is screened by mature and semi mature trees with some reaching a top height of 13m AGL. Contextually the site is mainly rural in nature with some residential areas to the north and south.

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Figure 3. Map of the Site

To the north of the site is the M4 motorway and further north are residential properties surrounded by agricultural fields. One such building in this area is 38 Old Purton Road, which is a grade II listed building. North east of the site are more agricultural fields which spread for a few kilometres. To the west are more fields with some commercial buildings which lie within. To the south is the main residential area in Royal Wootton Bassett. Finally, to the west there are yet again, more agricultural fields, showing the overall rural, secluded nature of the base station installation.

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

The installation of this ground based installation will enable enhanced 2G and 4G coverage and capacity to the surrounding area as well as provide new 5G service provision for VodafoneThree to ensure high quality customer experience is obtained as demands on the network increase and technologies change.

4G provision allows internet access, video calling, data downstreaming, accessing social media networks and emailing to name just a few of the benefits. Therefore, to

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maintain high quality indoor 2G and 4G services in to this area would promote activity in line with the general population demand as the ownership of smart devices increases. 5G will deliver unparalleled speeds and capacity, with significantly reduced latency, which will be needed to deliver numerous innovative applications from autonomous cars to Internet of Things.

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

Description:

The proposed works comprise the removal of existing 12m monopole supporting 3 no. antennas and the installation of a new 17.5m monopole supporting 3 no. antennas on an open headframe, 1 no 300mm transmission dish, 1 no. 600mm transmission dish and ancillary development there to including 18 no. Ericsson Radio Systems (ERSs).

Overall Height: 17.50m

Height of existing building (where applicable):

N/A Metres

Equipment Housing: Vari Rack

Length:

0.600 Metres

Width:

0.700 Metres

Height:

2.000 Metres

Materials (as applicable):

Tower/mast etc – type of material and external colour:

Galvanised – Steel – Grey

Equipment housing – type of material and external colour:

Steel – Grey

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

The existing radio base station has been in situ at Midge Hall for a number of years and has become an established part of the area. The location of the monopole is proposed to move slightly due to the root foundation not being strong enough to support the new requirements. However, technology advances (including 5G service provision) and additional demands on the operators' mobile network systems in the area have meant that replacement mast and additional antennas need to be installed to facilitate all the data that is required to be carried for mobile superfast broadband. This enables customers to continue to be able to use their handheld devices for the purposes in which they have become accustomed and now rely on in the modern world we live in, a similar scenario to the reliance on gas and electricity. However, this new technology and the design of the antennas required for 5G provision means that the existing mast has to be replaced in order to support all of the required equipment.

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One of the main thrusts of 'Supporting High Quality Infrastructure' in the NPPF is a reduction in the proliferation of telecommunications sites. The guidance states operators:

"should aim to keep the numbers of radio and telecommunications masts and the sites for such installations to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used, unless the need for a new site has been justified. Where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate".

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

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

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

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

VodafoneThree require improved coverage and capacity, and to ensure new 5G service provision in their networks in this cell area. This site is currently being utilised by VodafoneThree to provide 4G service provision. However, the operators require an upgrade of this site to be able to provide new 5G technology provision in this area as well providing enhanced 4G service provision. Due to the large data that is carried by this new technology the existing antennas cannot be utilised for new 5G as well as 4G services. In addition, the existing monopole is not structurally capable of supporting all the operator's latest technologies. Therefore, a replacement monopole is required to ensure that the latest technologies can be provided to the surrounding area. The replacement of the existing monopole is essential in order that customer's handheld devices continue to operate for the purposes in which they have become accustomed, accessible wherever they are whether that is indoors or outside.

To minimise the impact on the surrounding area, the replacement new antennas will

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resemble as closely as possible the existing antennas already in situ. They will be located in approximately the same location at the top of the monopole. The new antennas need to be slightly bigger in order to support the latest technologies and the high-speed data and capacity needed for customers' handheld devices to continue to operate for the purposes in which they were purchased.

The antennas are all unshrouded for technical reasons. However, they have been designed to be as tight as possible. The headframe will be wider than monopole to accommodate all the required technologies, however given the site's rural setting and set back from the road within the field, this change in appearance will not be overly noticeable. The higher the radio frequency the more signal attenuation there is. The higher frequency 5G antennas are unable to operate effectively through the Glass Reinforced Plastic that a shroud is made up of and as such if these antennas were to be shielded then they would not be able to provide the necessary coverage to the target coverage area. An additional installation would be needed elsewhere within the cell area, leading to the proliferation of masts.

The new antennas need to handle significantly more data and capacity than the existing antennas and as such need to be slightly bigger in order to accommodate all the technologies including new 5G provision in the one installation, without the need for an additional installation elsewhere in the immediate area of Wootton Bassett.

The design of the column maintains its simple, functional, vertical structure which will not appear incongruous within the area. This is especially so given its careful siting at the north of the field, sited against mature trees that rise to some 13m in height. The column will be coloured galvanised to blend in with the often grey sky. Although the column can be coloured any other colour the LPA consider appropriate.

It is also proposed to install ERS units. These aspects of the proposal fall within the remit of 'ancillary development' and do not require permission in their own right. They are small for telecommunications apparatus, approximately the size of a shoe box. They are designed to act like a booster to make the antennas more efficient and reduce the amount and size of equipment cabinets at ground level. They further reduce the overall amount of apparatus required at this radio base station minimising the visual impact on the area. Given this site's location set well within the field, away from the main highway, coupled with the position of the ERS behind the antennas it ensures that this ancillary development to the existing installation will not appear over prominent in the surrounding area.

The new transmission dishes will also be located below the antenna headframe at a centre line height of 13.5m. This will have no impact on the surrounding area considering the height on which they are located and their size. The dishes will provide

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a link into the network. A clear line of sight is required in order for them to meet their design brief.

It is therefore considered that the proposal before you strikes a good balance between environmental impact and operational considerations. The proposed upgrade in height and design represents the best compromise between the visual impact of the proposal on the surrounding area and meeting the multi technical requirements for the site. Taking all matters into account, it is considered that this upgrade proposal, to provide the latest of 2G and 4G service provision and new 5G coverage to the surrounding area, would not appear out of place within its surroundings and would provide enhanced high quality, reliable and secure coverage and capacity, delivering the capability for a multi hi tech service.

Health and Safety – including ICNIRP compliance

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

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

When determining compliance, the emissions from all mobile phone network operators on or near to the site are taken into account.

In order to minimise interference within its own network and with other radio networks, Vodafone Three Ltd operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision.

As part of VodafoneThree'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 transmitters 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 system. 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 included investigation and remedy of any reported significant interference.

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4. Technical Justification

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

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

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

The National Planning Policy Framework states that local planning authorities should not question the need for telecommunications systems, which the proposed development is to support. However, for the avoidance of doubt as set out below the proposed installation is needed for VodafoneThree, via Cornerstone to enhance the existing 4G coverage and capacity whilst also providing new 5G services to the Wootton Bassett area.

The term 'capacity' refers to the fact that each base station can only provide services to a certain number of users at any one time. When this is exceeded, coverage may remain present, the base station cannot provide service to any further users and calls/text/data usage would be unavailable. This is contrary to the purposes in which the operator's customers purchased their handheld devices as well as the Government's latest thinking that everyone should have access to the information superhighway wherever they are. Capacity is the maximum data or calls that can be processed by a base station.

Therefore, without this installation, the area would continue to be detrimentally affected as they continue to try to serve a much larger demand. The result would be constant buffering and dropped calls to the surrounding area, to the detriment of locals, businesses, students and visitors to the area.

Further details regarding the general operation of the network can be found in the accompanying document entitled 'General Background Information for Telecommunications Development'. In addition, fact sheets on Radio Planning and Propagation and 5G services have been attached to this application for reference. This information is provided to assist the local authority in understanding any technical constraints on the location of the proposed development.

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There is a specific requirement for a new radio base station at this location to allow VodafoneThree to provide increased digital connectivity to the Wootton Bassett area whilst also providing new 5G services.

5. Site Selection Process

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

Site Type	Site name and address	National Grid Reference	Reason for not choosing site
D1 – Streetworks	Coped Hall, Royal Wootton Bassett, Swindon SN4 8ER	Various	There is insufficient space available on this stretch of pavement as the siting and dimensions of a streetworks style mast and its associated equipment cabinets, would restrict pedestrian movements to unacceptable levels and may result in them stepping into the carriageway. The trees also overhang significantly here and would require significant tree lopping at the installation stage and when it comes to maintenance. Therefore, a site here was discounted as it would lead to highway safety concerns.
D2 – Streetworks	Dianmer Close, Wiltshire, Hook, SN4 8EB	Various	There are houses fronting both sides of this road. The pavements are narrow and there are regular driveways and pathways for some of the properties. Given the purely residential setting there are no opportunities to site a streetworks style proposal on Dianmer Close as on balance any scheme would compromise pedestrian movements, access arrangements

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			to properties and impact on highway safety.
D3 – Greenfield	Field east of Coped Hall, Midge Hall, Royal Wootton Bassett, SN4	E: 407806 N: 184228	This location would be too close to the overhead power lines to be safely installed and maintained in line with health and safety requirements.
D4 – Greenfield	The Glasshouse Restaurant Car Park, Copped Hall, Royal Wootton Bassett, Swindon SN4 8ER	E: 407648 N: 183857	Given the site's existing use as a car park where space is limited, with frequent vehicle movements and access arrangements, there is no practical space available to accommodate a ground-based installation of the nature and footprint required.
D5 – Greenfield	Midge Hall, Coped Hall, Wiltshire, Royal Wootton Bassett, SN4 8ER	E: 407736 N: 183940	The identified site has no permanent, nor can a viable route to site be identified. Therefore, even if this site obtained planning it has to be discounted as it cannot be accessed for build, any major upgrade works and maintenance purposes.

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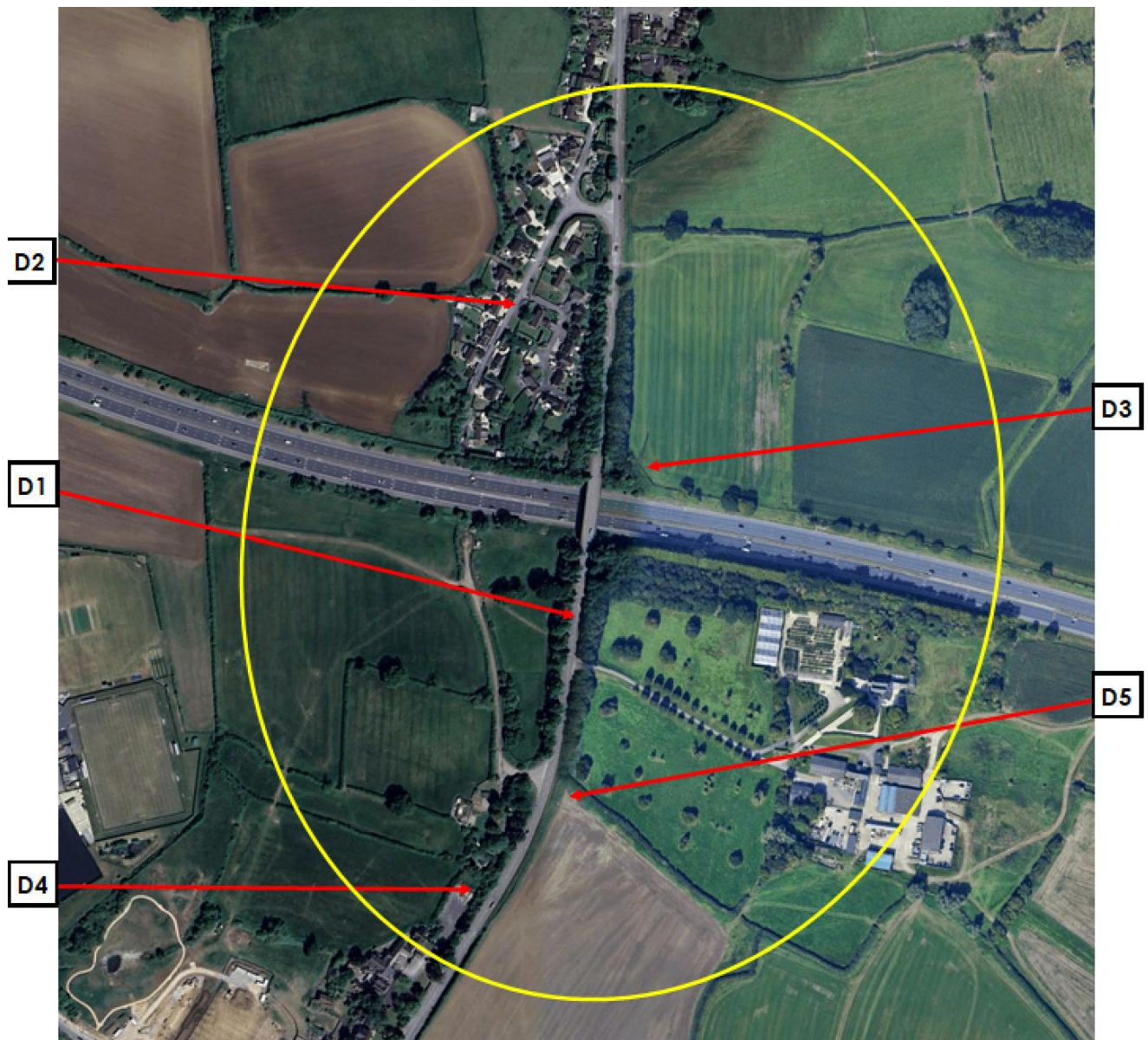


Figure 4. Map of Discounted Locations

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

N/A

Land use planning designations:

39 Old Purton Road – 100m North – Grade II Listed Building

Midge Hall – 400 West – Grade II Listed Building

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The Marsh – 400m South – Grade II Listed Building

Wootton Bassett Conservation Area – 1.4km South

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

National Planning Guidance

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

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

National Planning Policy Framework (December 2024)

The Government's National Planning Policy Framework (NPPF) was published on 24 July 2018 and updates the 2012 version. In February 2019 the NPPF was revised again, with minor alterations to wording relating to housing supply and not any parts relating to telecommunications. The NPPF was updated in July 2021, in order to strengthen sections including requirements on improved design quality, a new requirement for Councils to produce local design codes or guides, an emphasis on using trees in new developments, revised policies on plan-making, removing statues and opting out of PD rights relating to residential conversions. The NPPF has been revised again in December 2023, however, it did not affect any parts relating 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.

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The NPPF makes reference to 5G:

'Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G)...

With the above in mind, the Government is already forward thinking the evolution of data networks and seeks planning decisions to take account of this. 5G technology provides increased speed of data and more capacity in the network, to ensure that handheld devices can continue to be used for the purposes in which they were purchased. This will bring even greater economic and social benefits to the area.

Paragraph 120 of the NPPF retains the requirement to minimise the number of installations consistent with the efficient operation of the network but also includes being consistent with the needs of consumers and providing reasonable capacity for future expansion.

Paragraph 123 of the NPPF retains the guidance set out in paragraph 46 of the 2012 NPPF version which relates to determining applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.

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

The NPPF continues to provide guidance on decision-making. At paragraph 39 it states that:

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

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where possible'.

The NPPF builds on the aspiration to build a strong, competitive economy. Chapter 6 of the NPPF relates to 'Building a Strong, Competitive Economy' and refers specifically to 'Digital Infrastructure'. 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'...

Footnote 43 of the NPPF states:

'...The UK's Modern Industrial Strategy identifies priority sectors for growth and support as: advanced manufacturing; clean energy industries; defence industries; digital and technology businesses; financial services; life sciences; and professional and business services.'

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

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

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

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

Unlike previous iterations this Code of Practice has been led by the Department for Digital, Culture, Media and Sport (DCMS) and developed in collaboration with representatives of the mobile network industry, other government departments and

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public bodies, local planning authorities, and protected landscapes. This document replaces the previous Code of 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 out 'How wireless networks function.

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

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

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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.

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- **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'.

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

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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:

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

Para 27 requires that Local Planning Authorities consider these issues and consider the need for a site within a limited search area alongside the public benefit of improved connectivity. Para. 27 further considers that in general, it should not, therefore, be appropriate for planning authorities to seek wider evidence of alternative sites (beyond that required by the NPPF), unless they consider the proposed development is unacceptable having regard to the relevant material planning considerations. In respect of 'Design', the CoP at Para 28 acknowledges that the siting of wireless infrastructure will influence which design options are most appropriate for reducing the visual impact including

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

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

- *In urban areas, where there is a high level of demand for mobile data, mobile base stations are likely to need to be deployed more densely. In these settings you can expect to see more use of streetwork monopoles and rooftop installations, and, in future, we are likely to see a larger number of smaller units (so-called "small cells") deployed on buildings and on street furniture.*
- *In rural areas, base stations often need to cover wider geographic areas. Operators may need to use tall masts or lattice towers to provide the required coverage. The location of masts can sometimes be dictated by access to transmission links back to the operator's main network and proximity to a power supply. Coverage in some areas can be limited because of the geography, topography and terrain'.*

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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

The CoP explains the planning and visual considerations an operator should aim towards when siting a new mast, including the information referenced above:

Paragraph 39 of the CoP refers to mast positioning:

'All new masts should be sited, so far as is practicable, so as to minimise their impact on their setting, including the landscape and any buildings. This includes sitting next to similar structures - streetworks masts, for example, should ideally be sited in line, and in harmony, with existing vertical infrastructure, such as street lighting columns, to minimise their visual impact. 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 treeline and the trees may need to be maintained to prevent growth above a certain level'.

Paragraph 40 refers to colouring and camouflage of the mast:

'Where appropriate, masts should be coloured to match their backdrop to minimise contrast in an urban or rural setting. Streetworks monopoles can utilise design features such as shrouding or banding to protect visual amenity, though, for some 5G infrastructure, camouflage design solutions may not be practicable. Simple designs should be encouraged - masts which have complex designs are more likely to dominate and be in discord with the landscape and have adverse visual impacts. Operators and planning authorities should work collaboratively to agree on the optimal design solution on a site-specific basis'.

Local Policy

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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”.

Wiltshire Core Strategy (Adopted January 2015)

The Wiltshire Core Strategy sets out a flexible and realistic framework within which local communities can work. The purpose of the planning system is to contribute to the achievement of sustainable development. The policies and proposals contained within this strategy, taken as a whole, constitute what sustainable development in Wiltshire means in practice for land use planning.

Strategic objective 6: to ensure that infrastructure is in place to support communities

The anticipated level of growth within Wiltshire will increase demand on local infrastructure services and facilities. The strategy will need to ensure that infrastructure requirements are appropriately planned, secured and implemented to ensure the timely delivery of development proposals.

Core Policy 48: Supporting rural life

Core Policy 48 explains the approach that will be taken to support rural communities, outside the limits of development of Principal Settlements, Market Towns, Local Service Centres and Large Villages and outside the existing built areas of Small Villages.

Improving accessibility between places within the countryside may sometimes mean that development requiring planning permission is required, such as new roads, cycle routes, gates, signposts and bus shelters. Some telecommunications works may also fall into this category. In such cases, Core Policy 48 introduces a presumption in favour of such works which can greatly benefit rural areas, where these are environmentally acceptable.

Core Policy 57: Ensuring high quality design and place shaping

Ensuring high quality design and place shaping

A high standard of design is required in all new developments, including extensions, alterations, and changes of use of existing buildings. Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality. Applications for new development must be

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accompanied by appropriate information to demonstrate how the proposal will make a positive contribution to the character of Wiltshire through:

- i. enhancing local distinctiveness by responding to the value of the natural and historic environment, relating positively to its landscape setting and the existing pattern of development and responding to local topography by ensuring that important views into, within and out of the site are to be retained and enhanced
- ii. the retention and enhancement of existing important landscaping and natural features, (e.g. trees, hedges, banks and watercourses), in order to take opportunities to enhance biodiversity, create wildlife and recreational corridors, effectively integrate the development into its setting and to justify and mitigate against any losses that may occur through the development
- iii. responding positively to the existing townscape and landscape features in terms of building layouts, built form, height, mass, scale, building line, plot size, elevational design, materials, streetscape and rooflines to effectively integrate the building into its setting
- vi making efficient use of land whilst taking account of the characteristics of the site and the local context to deliver an appropriate development which relates effectively to the immediate setting and to the wider character of the area
- vii. having regard to the compatibility of adjoining buildings and uses, the impact on the amenities of existing occupants, and ensuring that appropriate levels of amenity are achievable within the development itself, including the consideration of privacy, overshadowing, vibration, and pollution (e.g. light intrusion, noise, smoke, fumes, effluent, waste or litter)
- x. the sensitive design of advertisements and signage, which are appropriate and sympathetic to their local setting by means of scale, design, lighting and materials

Swindon and Wiltshire Digital Capabilities Strategy - Draft Strategy (September 2018)

It is built around three key themes:

- Digital Creation: enabling the growth of those businesses at the 'leading edge' of digital innovation.
- Digital Adoption: ensuring that across the economy, businesses remain ahead of the curve in using digital technology to stay competitive and resilient.

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- Digital foundations: making sure that our future success is underpinned by the right infrastructure and the right skills as technology advances.

Mobile coverage in Swindon and Wiltshire similar to comparator locations

There are some gaps in 2G and 4G availability, mostly on the Salisbury Plain and in the south of Wiltshire (accounting for about 4% of Wiltshire's land area for 4G). But overall, 90% of Swindon's and 67% of Wiltshire's land area has 4G mobile coverage by all four mobile network operators.

Weaknesses

Lack of universal superfast broadband coverage, as some rural areas remain without provision – and mobile coverage sub-optimal in some places.

Digital Infrastructure

Strategic aim: *"To ensure that Swindon and Wiltshire's digital infrastructure network keeps pace with the potential of new technology and that the benefits of this technology are spread evenly throughout the area"*

Mobile coverage is good in Swindon and Wiltshire with very high coverage of 2G networks (still important for voice coverage) and high and growing 4G coverage of Swindon (90%) and Wiltshire (67%)

Action 3.7: Engage with mobile operators so that they are aware of acute problems caused by poor coverage or capacity.

Connected Nations 2025 Report (November 2025)

Connected Nations is an annual report on progress in the availability of broadband and mobile services in the UK, including the roll out of mobile 5G networks. The 2025 report was published in November 2025. These reports support Ofcom's objective of making communications work for everyone, including to promote reliable, widely available, and high-quality networks. The latest report found that the availability of 5G services is continuing to grow rapidly. The level of 5G coverage provided outside of premises by at least one mobile network operator (MNO) is now between 94% and 97%. 4G coverage now reaches 96% of the UK landmass outdoors from at least one MNO.

For the first time the Connected Nations report supplied information on 5G standalone coverage (5G SA) which is now available across 83% of areas outside of premises in the UK for at least one MNO.

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Two MNOs have completed their 3G switch-off and all operators have committed to retiring their 2G networks by 2033 at the latest.

Whilst 4G coverage now reaches 96% of geographic landmass, 4G is in a slow user decline. It still remains the most used mobile technology, however the report notes its down by 6 percentage points from 2024, indicating a shift towards 5G.

Figure 3.1: Overview of voice and data coverage across the UK and UK nations ³⁷

	5G outside premises (MNO range)	5G SA outside premises (MNO range)	4G outside premises (MNO range)	4G geographic (MNO range)	4G total not spots	Voice and text total not spots
UK	64-89%	47-65%	99-99%+	89-90%	4%	3%
Scotland	59-84%	40-64%	99-99%+	79-81%	10%	6%
Northern Ireland	38-95%	20-91%	98-99%	90-96%	2%	1%
Wales	23-89%	12-57%	99%	84-90%	3%	2%
England	67-91%	47-67%	99%+	95-96%	1%	1%



Source: Ofcom analysis of MNO data (July 2025)

Figure 5. Voice and Data coverage across the UK and UK nations

The footprint where all MNOs provide 5G coverage remains considerably lower. However, the Connected Nations 2025 report notes the shift towards 5G standalone, with 5G SA coverage from at least one MNO reaching 83% at the High Confidence level and 74% at the Very High Confidence level in areas outside of premises and reported 5G SA deployments accounting for approximately 41% of all 5G sites.

The rollout of full 5G (SA) is important because it enables more advanced features (lower latency, higher capacity) beyond the “non-standalone” 5G that uses 4G core networks. The report highlights this as a key infrastructure step.

There is gradual progress in geographic 5G coverage, however the report notes this is at a moderate pace. As of 2025, overall 5G coverage across the UK geography

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stands at 65% at the High Confidence level and 54% at the Very High Confidence level - up from 60% and 48%, respectively, in the previous year.

Indoor coverage continues to be widely available, there are certain factors that impact the level of indoor coverage people are able to access, including: wall thickness, building materials used in construction and where in a building people are using their phone. Indoor coverage is notably lower in rural areas, compared to urban areas.

Although coverage figures are high, coverage is only one part of service quality. The report and commentary note that the rollout of advanced 5G (SA) is still ongoing and that some areas (especially rural) still rely on older infrastructure.

The Connected Nations 2025 report also contains an updated interactive map which shows mobile coverage for the local authorities throughout the UK. The below figures show the coverage of landmass, premises and roads by mobile networks for voice, data for 5G (with a High Confidence, and Very High Confidence). The line charts below show coverage over time since May 2022 in relation to 5G coverage at both high confidence and very high confidence levels in Wiltshire.

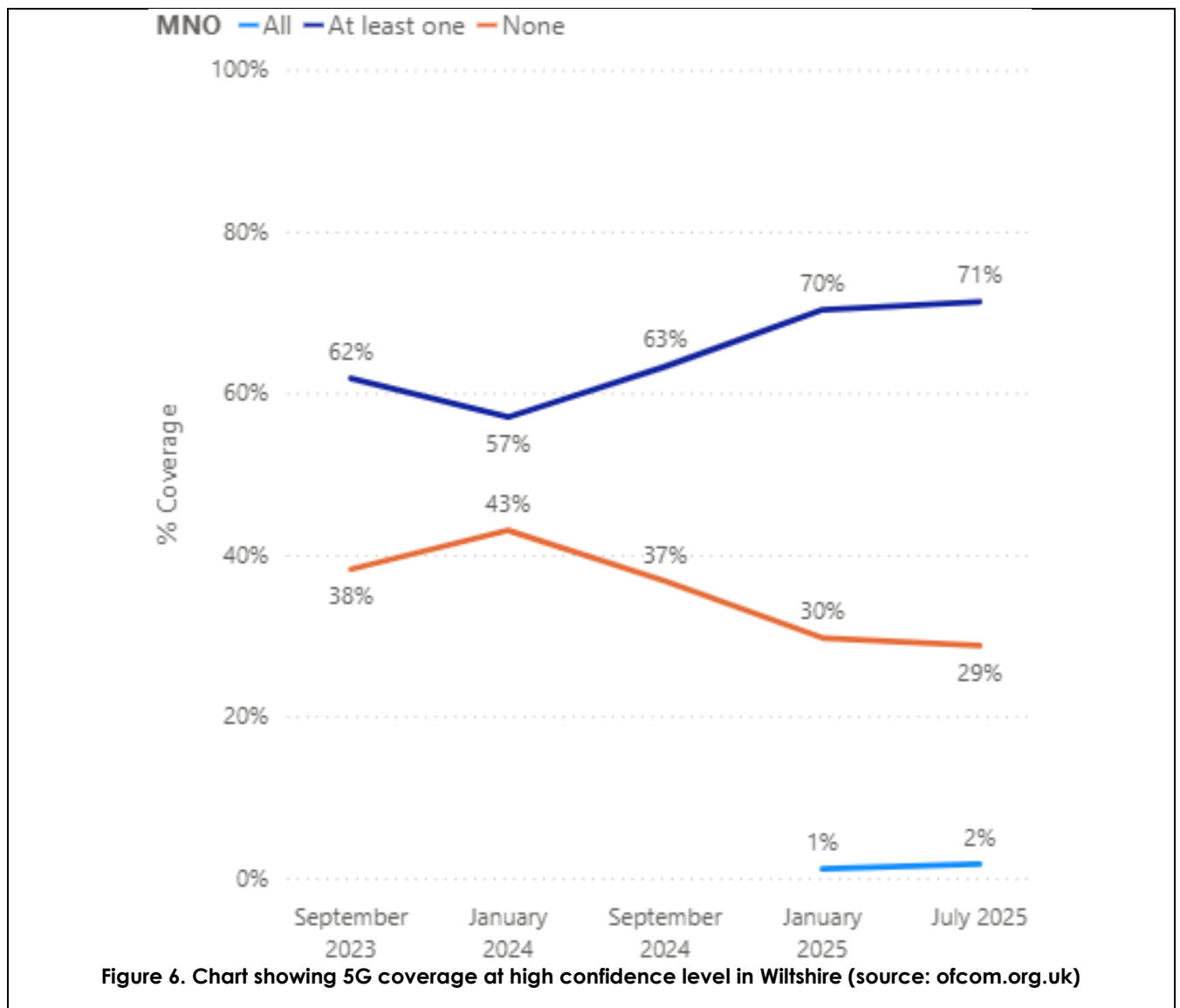
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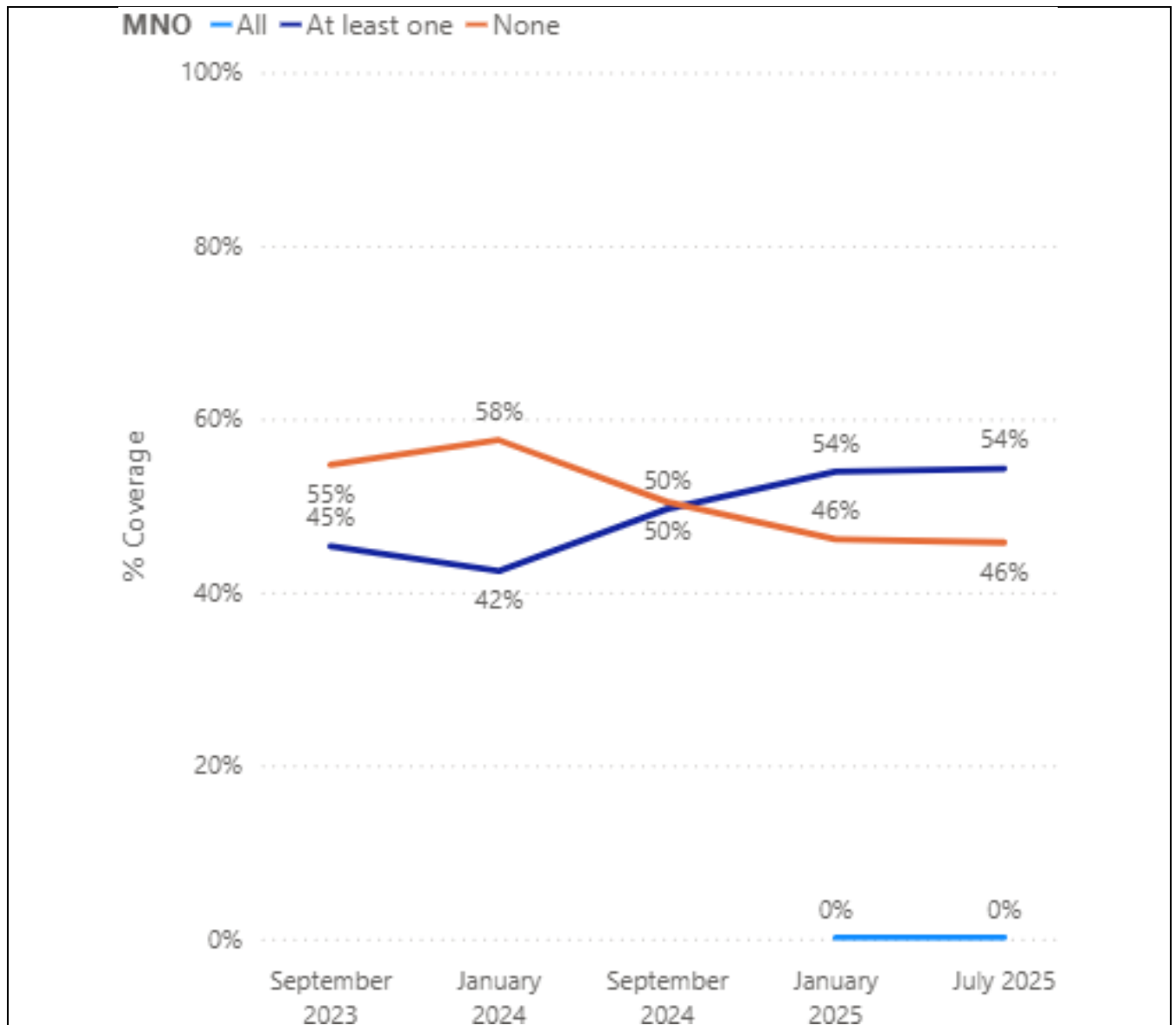


Figure 7. Chart showing 5G coverage at very high confidence level in Wiltshire (source: ofcom.org.uk)

As shown in the figures above, 71% of the Wiltshire area has access to 5G at a high confidence level from at least one operator, and 54% has access at a very high confidence level. However, these figures drop significantly to 2% and 0% respectively when considering 5G provision from all four main mobile operators. The proposed radio base station will help improve digital connectivity in the surrounding area by enhancing 2G and 4G coverage and capacity, and by providing new 5G coverage.

UK Wireless Infrastructure Strategy (April 2023)

In April 2023, the UK Government published the 'UK Wireless Infrastructure Strategy'¹, a plan for delivering world-class digital infrastructure which the government identifies

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as an essential enabler for its 5 priorities of building a better, more secure, more prosperous future for the UK, including growing the economy, and creating better-paid jobs and opportunity right across the country. In her foreword, the Rt Hon Michelle Donelan MP, Secretary of State for Department for Science, Innovation and Technology, provides context for the strategy:

*"5G will be the cornerstone of our digital economy. With higher capacity and lower latency, standalone **5G will drive growth** in the industries of today and tomorrow, including in emerging sectors like artificial intelligence where Britain leads the world. Just take smart ports, where 5G-enabled remote operation can help us to move containers more quickly, efficiently, and safely, boosting our international competitiveness. **5G can improve our public services**, too, in everything from education to social care. In transport, for example, we can use 5G to power forward progress in everything from real time travel information to augmented reality navigation and self-driving buses and taxis.... This is an incredible opportunity; widespread adoption of **5G could see £159 billion in productivity** benefits by 2035".*

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

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

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

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

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

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

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

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

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

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

Planning Assessment

The main issues arising from this prior approval application to replace the existing installation at Midge Hall Nurseries is whether the mast and replacement head frame, due to their scale and siting, would be a visually obtrusive feature which would be detrimental to the character and appearance of the area and 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 in the NPPF, which fully supports the roll out of 5G and the next generation connectivity to accelerate business opportunities and growth to ensure the economy is resilient and competitive, the Code of Practice, and also the relevant objectives and policies within the Wiltshire Core Strategy.

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The replacement of the existing mast complies with the NPPF, the Wiltshire Core Strategy and the Swindon and Wiltshire Digital Capabilities Strategy as it will improve capacity and provide new 5G services to this area of Wootton Bassett. Access to a high quality, reliable superfast mobile network is not just 'a nice to have' but an essential part of everyday life. In the latest UK Infrastructure 10 year Strategy (June 2025), the Government identifies digital connectivity being part of the long term future of the UK. The Strategy states:

"Digital infrastructure for growth and innovation

Para - 3.37 Digital infrastructure supports productivity growth through lowering costs for firms, underpinning technological change, widening access to labour markets across the country and enabling new and innovative services to be provided.

Para - 3.38 Digital infrastructure also increasingly underpins the provision of services critical for the functioning of society, business, and government – including the operation of other infrastructure sectors. In particular, demand for data centre services is projected to surge over the next decade including for AI development and deployment.¹²⁰ The government is committed to facilitating the development and expansion of cutting-edge, secure, and sustainable digital infrastructure that meets the needs of both the private and public sectors".

The principle of development has been established by the Government when the new permitted development rights came in to force in April 2022, 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 in to consideration (as the width of the replacement column and headframe is more than two thirds wider than the existing).

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).

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The Planning Portal also provides Application Type Guidance. This guidance states that:

'Certain forms of telecommunication development, for example, mobile telephone masts, are known as 'permitted development' and subject to prior approval from the local planning authority. The prior approval procedure means that the principle of development is not an issue. The LPA can only consider the siting and appearance of the proposal'.

The proposal is similar to the design submitted under LPA ref: PL/2023/09107. However, there are more ERS's being required due to the increase in demand. The location of the pole is also moving by a few metres. It is considered that the proposed will appear in the same context as the current situation as well as the proposal that was approved in 2023.

Siting

The existing radio base station has hosted telecommunications equipment for a number of years, and it has become an established feature in this area of Wootton Bassett.

This is in full accordance with NPPF as it will utilise an existing site. The replacement of the existing monopole with a new monopole and headframe are required in order to improve the existing 2G, 4G coverage and capacity in this cell area, as well as providing new 5G coverage. This is in fully accordance with national guidance contained within the NPPF, the Code of Practice and Core Policy 48 of the Wiltshire Core Strategy.

The proposed amendments have been carefully considered. The top height of the antennas will remain exactly the same height as the current situation. The new antennas will resemble as closely as possible the existing antennas currently in situ and they will be located in approximately the same position as the existing antennas at the top of the monopole, although they are wider. The new antennas will be made from the same type of materials, same colour and a similar size to the existing antennas although they will need to be slightly bigger and wider in order to support all the latest technologies on the one installation. This minimises visual amenity in line with Strategic Objective 6 of the Wiltshire Core Strategy and will not detrimentally affect the character of the surrounding area.

The proposed replacement of the existing radio base station will fully support the NPPF guidance. Government guidance states that in order to limit visual intrusion, the number of radio and telecommunication sites should be kept to a minimum consistent

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with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing buildings and other structures for new electronic communications capability should be encouraged. It is therefore in full compliance with the NPPF.

This upgrade to the radio base station will fill the gap in coverage that this area of Wootton Bassett is experiencing in line with the NPPF. The operators' license obligations requires them to meet customers "reasonable demand". Reasonable demand would be to provide indoor coverage as customers expect to be able to use their handsets indoors. The operators also have a competitive market driven "requirement" to provide a high-quality service. The monopole is essentially required to enhance the existing 4G coverage and capacity but will also provide new 5G services to the area. The new site will reduce the overall number of radio base stations required which is fully in line with national guidance and The Code of Practice.

Technical requirements have dictated the siting of the proposed equipment. The operator has spent a considerable amount of time identifying a potential site and the proposed location is considered to present the best balance between operational/technical requirements and environmental impact. The search area is naturally smaller due to the operator looking to upgrade their existing site. Moving outside of the search area simply would not work, it would leave a hole in coverage in this location, and another radio base station would be required in order to infill this hole. This would lead to a proliferation of masts, contrary to the NPPF.

Appearance

The appearance and design of the installation has been selected to balance both the technical requirements and constraints associated with telecommunications development and to minimise harm by considering planning, environmental and visual considerations. To this end, it is a simple, functional monopole. The column width is essential in order to safely support the antennas at the top of the column. The column is proposed to be galvanised to match the existing monopole. However, the street pole can be painted any colour should the Local Planning Authority consider that an alternative colour would be more appropriate.

The height of 17.5m is essential and will be seen in a similar view as the current site. The top height of the current site is 14.6m AGL, resulting in less than a 3m increase in height in total height. If the column were to be any lower, the antennas would not be able to clear the surrounding urban clutter as such would not be able to operate effectively. A lower height would lead to a poor user experience for a large part of the target coverage area. As such, this would fail the operators design brief, and an additional installation would have to be found leading to the proliferation of masts contrary to national planning guidance contained in the NPPF. This would have a

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greater impact on the wider surrounding area, as there would be multiple masts required in order to reach the target coverage area of Wootton Bassett. The proposed monopole benefits from being in line with other vertical elements in the area such as pylons and mature / semi mature trees.

It is essential that the 5G antennas are unshrouded. As the radio frequencies get higher, required for data carrying, the antennas are less able to propagate through immediate blockages including Glass Reinforced Plastic, which is what the shroud is made from. This affects the 5G antennas more so than any other technology. The result being they cannot operate effectively close to Glass Reinforced Plastic or any other blocking material. Therefore, there is a technical reason why the 5G antennas need to be unshrouded. The latest 4G technology are also affected more so than older technologies by propagation and are therefore less efficient if they are shrouded. As such, the other antennas also need to be unshrouded to ensure that the latest technologies are provided to the surrounding area maximising their propagation.

NPPF states at paragraph 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. In order to provide the latest 4G technology and 5G service in this locality, and to ensure that the coverage in the area is reliable and does not buffer or drop out, an upgrade to the site is required. The operator has already explained above, it is unable to shroud the antennas, but the design is as slim as possible and will represent a simple, functional, vertical structure in the area similar to the existing mature / semi mature trees adjacent to the site.

If the column and shroud were to be any slimmer, then the multi technologies would not be able to fit in the same upgrade and an additional radio base station would be required which would be contrary to national planning guidance. It would also not be structurally capable of supporting all the technologies including the latest 4G coverage as well as 5G service provision. If the column were to be the same width throughout, then it would have to be as wide as the antennas at the top of the column.

This is the slimmest design approved for use by the operator, which will enable all technologies to be supported from this site. The antennas have been designed to be as tightly packed together as possible to minimise their visual appearance. If the column and antenna width were to be any slimmer then the technology would not fit in the one column and another radio base station would be required, which would lead to the proliferation of masts contrary to national guidance contained in NPPF and the Code of Practice. Similarly, if the column were to be a uniform width

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throughout then the width of the supporting column would have to increase which would appear more visually prominent in the area, than the proposed design.

The only element of the proposal which requires prior approval is the monopole. The cabinets are designed to appear like other statutory undertakers' equipment cabinets, including in the immediate locale. The equipment cabinets measure below 2.5m² so can be installed under the operators permitted development rights. However, they have been included on the plans and in the description in order to remain fully transparent. Their colour is proposed to be grey to match other statutory operators' equipment cabinets commonly found in urban areas.

The proposed new site accords with NPPF because the equipment will resemble other linear structures within the area and will expand the network, ensure high quality communications infrastructure is maintained whilst minimising the number of radio base stations in the area. Placing masts near similar structures such as trees, light columns and road signage, utilising simple and unfussy designs is acknowledged in the Code of Practice on Mobile Network Development in England to be less likely to dominate and be in discord with the rural scene and as a result less likely to have a detrimental impact on the visual amenity of the surrounding area.

Lack of Coverage – Material Consideration

Attached as part of this application is a letter dated 29 November 2024. The letter is from Sir Chris Bryant MP to Council Leaders and Council Chief Executives across the UK in support of digital infrastructure deployment.

The letter confirms the importance of fast and reliable connectivity and the Government's commitment to supporting the delivery of next-generation connectivity across the UK by driving towards nationwide 5G coverage by 2030. The letter requests help from Councils across the UK to achieve these goals by prioritising digital infrastructure and focussing on a number of areas that remain a challenge to telecoms investment.

There is a specific ask in the MP's letter that Councils 'support the deployment of communications infrastructure wherever possible' (emphasis added).

The Government published the UK Government Resilience Action Plan on July 2025. At paragraph 57 - Improving the resilience of Critical National Infrastructure, it states:

"The resilience of the UK's CNI is of central importance to ensuring that the essential services the public rely on continue to operate. Given the fundamental and connected nature of these services, failure has the potential to cause cascading and catastrophic consequences. This could be, for

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example, power outages impacting other essential functions, like transport or water provision, **or a failure in the telecoms or data infrastructure sectors impacting the energy sector - across all four nations**" (emphasis added)

And para 109d –

"further invest in resilient telecommunications capabilities for crisis management response. The UK government has undertaken a strategic overhaul of its approach to resilient telecommunications, which are paramount to respond to a National Power Outage and other national security risks. This has included a recent investment in ensuring our resilient voice capability, situated across the UK to enable a means of information flow across the local and national level, is fit for purpose and is now exploring opportunities to augment our capabilities with the addition of resilient data provision".

These Government publications weigh heavily in favour of the application in regard to the social and economic benefits of telecommunications installations, more specifically 5G can bring.

The current proposals will facilitate the development of an advanced broadband telecommunications infrastructure in line with the National Government guidance contained within the NPPF which supports infrastructure especially where growth takes place. By providing the latest 4G technology and new 5G service provision the proposals will support the aspirations of Central Government for everyone to have access to the superfast highway network wherever they are and that all populated areas access to a 5G service by 2030.

The proposals will ensure that any customer in this cell area will be able to access resilient, seamless connectivity at a speed they need anywhere at any time. Without the more basic technology solutions such as 5G, the Wireless Infrastructure Strategy Framework acknowledges that smart-region solutions and value-added outcomes will struggle to be brought to fruition.

Mobiles can only work with a network of base stations in place where people want to use their mobile phones or other wireless devices. Without base stations, the mobile phones and other devices we rely on simply won't work.

Without this proposed replacement the operator's customers would experience increasing numbers of dropped calls and buffering unable to access the internet on their handheld devices. They would also not be able to access the 5G network, a demand which is increasing rapidly as customers update their handheld devices to ones that are 5G compatible. If the 5G network is not available, then the customers would not be able to utilise these handheld devices for the purposes in which they

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were purchased. This would be contrary to the aspirations of Central Government which aspires to everyone having access to the superfast highway network wherever they are and being a world leader in 5G.

The Government fully supports high quality communications infrastructure, even more so with the advent of 5G. The NPPF continues to strongly support telecommunications connectivity and states at paragraph 119 that local planning authorities should support the expansion of electronic communications networks. It acknowledges that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being.

The demand for mobile data in the UK is increasing rapidly, and as households and businesses become increasingly reliant on mobile connectivity, the infrastructure must be in place to ensure supply does not become a constraint on future demand.

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

In the Code of Practice emphasis, the need for Local Planning Authorities to take account of these constraints, on network deployment and siting and design, when considering proposals. In relation to the introduction of 5G network deployment the Code acknowledges the requirement of additional equipment to provide necessary coverage and capacity. With the increasing consumer demand and the Government's ambitious aspirations it is becoming more important to improve connectivity and capacity. This is due to the ever increasing demand for data hungry applications to be available to a range of connected devices, such as smartphones and tablet computers. However, the Code notes that upgrading and improving mobile networks will not be possible without the necessary infrastructure on which they rely. Therefore, there is a significant need to locate the equipment in this area.

The operators not only have a license requirement to provide a certain level of 2G/4G coverage to the population, but they are also obliged to meet the growing consumer demand for 5G coverage, especially as more people are purchasing 5G enabled devices, in line with their license obligations and the operators competitive market driven "requirement" to provide a high quality service. Customers expect to be able to access their portable handheld devices wherever they are, whether that be indoors or outside.

It is therefore imperative that the operator continues to invest in ensuring that the latest technologies are available on its network, so that customers are able to

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continue to use their handheld devices wherever they are, for whatever reason, for the purposes in which they were purchased.

Economic and Social Benefits

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

In such instances, as described above, the NPPF supports development that improves the economic, social and environmental conditions in the area. Enhancing the 2G, and 4G coverage and capacity in this area and providing new 5G services will fully meet this national policy objective. Continuing to transform the digital connectivity of the city-region to drive economic growth and innovation, working to meet national targets of full roll-out of 5G technology for all populated areas by 2030.

Providing the latest digital infrastructure to enable improvements in digital technology empowers and enables residents to have the highest quality of life, supports the creation of high quality jobs and achieves the maximum productivity levels. It also helps the economy to be resilient and competitive. This is in accordance with the UK Wireless Infrastructure Strategy. It will help Wootton Bassett become an area where its businesses, public service providers and citizens are using digital technology by default and to the fullest to grow their businesses and improve productivity to access skills, training and employment opportunities to address global challenges that have a local impact such as ill health, social isolation, and pollution; to improve living standards and well-being, helping people to lead prosperous and rewarding lives; and to improve the quality and value for money of public services.

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In line with Core Policy 48 of the Wiltshire Core Strategy, the significant socio-economic benefits that are associated with improved digital connectivity, including the provision of new 5G coverage and capacity to this region of Wiltshire outweighs the "less than substantial" harm that would arise from this replacement.

The proposed 5G installation would deliver a range of notable socio-economic benefits that carry significant weight in the planning balance. Enhanced 5G coverage supports improved mobile connectivity, enabling faster, more reliable digital communication for residents, businesses, and visitors. This uplift directly contributes to economic productivity, allowing local enterprises to operate more efficiently, adopt new technologies, and remain competitive.

Improved digital infrastructure also strengthens the area's attractiveness for investment, employment, and innovation, helping to future-proof the local economy. For residents, 5G enhances access to online services including education, healthcare, and public services, promoting greater social inclusion. The upgrade also supports emergency services and public-safety communications, contributing to wider community benefits.

Practical Applications of 5G Connectivity as Example of Material Socio-Economic Benefit: -

Education:

The relationship between 5G and education is evolving at a massive rate with educators exploring the relevance of Virtual Reality (VR) technologies for education and training. Crucially, VR can support remote learning, allowing students a presence in the classroom even when working elsewhere.

5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high definition images and video), increased capacity and heightened security will also allow learning on the job, thanks to technologies such as Augmented Reality (AR) goggles, which can give engineers real-time instructions on how to fix a machine on a production line, for example.

Health:

Patients across the country are now becoming accustomed to relying on remote healthcare services such as NHS 111, virtual GP appointments, and ordering online deliveries of essential medical supplies.

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5G will prove critical in providing the infrastructure required to deliver remote health services over the next decade. By design, 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high definition images and video), increased capacity and heightened security are going to be fundamental in scaling the patient benefits of remote healthcare and keeping medical records secure and private. For instance, trials have shown that connecting ambulance crews to expert resources using 5G allows paramedics to work with doctors and conduct specialist procedures in real time whilst on the road.

Paragraph 39 of the NPPF states that:

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

Providing improved 4G coverage and capacity and new 5G service provision in this area will fully meet paragraph 39 of the NPPF and the Wiltshire Core Strategy. These strategies and the Wireless Infrastructure Strategy Framework also support strengthening digital and data infrastructure (including 5G) and using data to help address challenges.

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

This will allow everyone in the country to benefit from the economic advantages of widespread mobile coverage. As well as improved mobile signal, 5G networks are also crucial to drive productivity and growth across the sectors that local areas are focusing on through their emerging Local Industrial Strategies. Enabling and planning for 5G implementation is central to achieving the Government's objective to deliver property at the local level and enable all places to share in the proceeds of growth.

The case for 5G is compelling as it will bring faster, more responsive and reliable connections than ever before. More than any previous generation of mobile networks, 5G has the potential to improve the way people live, work and travel, and to deliver significant benefits to the economy and industry through the ability to connect more devices to the Internet at the same time, creating the so-called

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“Internet of Things”. This will enable communities to manage traffic flow and control energy usage, monitor patient health remotely, and increase productivity for business and farmers, all through the real-time management of data.

Summary

A similar design has been approved in 2023, in a similar position. The current proposal will move all but a few metres from this application and will stay within the same compound. This was due to the root foundation not being structurally strong enough to support the technologies required now by the operator. The site will be seen in a similar context. There are additional ERS's required, in turn this increases the width of the headframe. It is considered the overall bulk of the headframe will not impact the surrounding area given its setting, away from any residential frontages and located in the context of a predominantly rural area.

The existing site is located at land at Midge Hall Farm just south of the M4. This site was chosen to be upgraded to 17.5m as it will be viewed in line with the pylons and mature/semi mature trees adjacent, which minimises the impact in this area. The site will be rising by less than 3 metres in terms of top overall height of the antennas. The replacement pole is proposed to be coloured galvanised to allow it to blend in with the typically grey sky, further minimising visual impact in the surrounding area.

As part of Vodafone Three's continued network improvement program, there is a specific requirement for a new installation at this location to provide improved 4G coverage and capacity, and new 5G coverage, ensuring that this area of Wootton Bassett has access to the latest technologies.

The proposed height at 17.5m is essential in order for the antennas to clear the surrounding trees and ensure the antennas are able to reach the target coverage area, to provide new high quality 4G coverage and capacity and new 5G service provision to Wootton Bassett.

This will fully meet the national Governments aim of 'ensuring that everyone is connected to the information superhighway' and the national policies set out in the NPPF. If the height of the column were to be reduced then the antennas would not be able to operate effectively, leading to a degraded service for the operator's customers especially for the higher frequency technologies including the latest 4G technology and new 5G service provision.

The social and economic benefits of providing reliable and high quality mobile broadband connections including 5G support growth in productivity, efficiency and labour force participation across the whole economy. This is fully supported by the

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

Registered Address:

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Registered in England & Wales No. 08087551.
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NPPF. These benefits are strong material considerations which outweigh any perceived loss of visual amenity to the surrounding area.

Confirmation that submitted drawings have been checked for accuracy

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Signed:		Date:	23/02/2026
Position:	Graduate Town Planner		

(on behalf of Cornerstone)

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