

Town Planning & Heritage Statement

5G Electronic Communications Base Station

At the Existing Cellnex UK Site

**MARLBOROUGH
ARQIVA SITE, FOREST HILL
MILDENHALL
MARLBOROUGH
WILTSHIRE
SN8 3HN
*NGR: E 420961 N 168813***

Site Reference 141149

CELLNEX UK AND CTIL

March/2026

1. INTRODUCTION

- 1.1 This statement is submitted in support of an application for planning permission for a 5G mobile base station for the mobile network operator(s) (MNOs) Vodafone Ltd in conjunction with Cornerstone. The application site is owned / operated by Cellnex UK, a radio site infrastructure provider.
- 1.2 The application includes:
- A description of the site and surrounding area
 - A description of the proposal
 - A statement of community engagement
 - A review of planning policy considerations
 - A review of design and access considerations
- 1.3 A number of other accompanying documents have been submitted in support of the application and these are referred to and must be read in conjunction with this statement.

2. SITE AND SURROUNDING AREA

2.1 The site is located in a rural context with the immediate area containing mature trees to all sides. It is acknowledged the site is located within North Wessex Downs Area of Outstanding Natural Beauty (AONB).

Notable nearby heritage assets include the Scheduled Monument Camp on Forest Hill. However it should be noted that the existing 46.3m.

2.3 The most recent previous planning site history is listed below:

16/11347/PNTEL- Prior notification for the installation of a back-up power generator.

3. THE 5G PROPOSAL

3.1 The development proposed is shown in detail in the drawings submitted and is for an upgraded 5G electronic communications base station. The deployment of 5G will utilise the MNOs existing 3G and 4G networks such as the base station already existing at the application site. As such, the application site is likely to carry different mobile connectivity services in parallel, with high data uses operating through the new 5G higher capacity network apparatus subject of this application.

3.2 Unlike earlier generations of mobile connectivity, 5G has more significant technical and operational requirements and this has implications on the amount, height, position and design of the upgraded base station apparatus on the rooftop of the building. To help explain this important detail, we have set this out in the accompanying “**5G Technical Support**’ document, which must be read in conjunction with this planning statement.

3.3 The principal elements of the proposed development at the application site reflect these various siting and design factors within the technical support document:

The removal of 3 x RRZZVV-65B-R6N43 antenna at 25m from the existing 46.4m lattice tower.

These will be replaced by the installation of 3 x AP-MIMO antenna at 25.69m and 3 x AP-Medium antenna at 25m utilising existing support poles and yoke brackets of the lattice tower.

Ancillary works will see the removal of 9 x ERS Units from the tower, these will be replaced by the deployment of 9 x RRU's at 25.5m, 6 x RRU's at 24.3m, 3 x RRU's at 24.3m and 3 x Ancillary Large at 23.5m utilising existing steelwork off the tower. There will also be the removal of 3 x DC BoB's, 6 x Diplexors, 12 x feeder cables and 3 x Multicore fibre cables. These will be replaced by 9 x Multicore fibre cables and 15 DC cables within the existing cable management system, the equipment cabin at ground level will also have refreshment works within it.

3.4 The radio equipment housing will need to be mechanically ventilated to avoid overheating of equipment. The ventilation equipment is only likely to operate during the day during hot weather. If it is considered specific noise attenuation measures to be necessary, we would be pleased to discuss practicable solutions.

- 3.5 Paragraphs 16 & 17 of the Code of Practice for Wireless Network Development in England, published in March 2022 , explains how mobile networks operate. In the annual network rollout information supplied, the operators will have explained their network requirements for 5G and the anticipated use of existing sites, including those owned by radio site infrastructure providers like Cellnex UK.
- 3.6 The application site has been selected by the operator as this will provide the required level of 5G network coverage while properly meeting national town planning policy objectives for the shared use of existing electronic communication sites, in this case owned / operated by Cellnex UK.

4. PRIOR ENGAGEMENT

- 4.1 The recently revised National Planning Policy Framework (NPPF) and the Code of Practice for Wireless Network Development in England require a consultative approach to network development with the planning authority and local community, reflecting the particular sensitivities of any given site. The proposal received Red when assessed against the traffic light rating model as referenced in the Code of Practice.
- 4.3 In our engagement letter, sent out on the 15th January 2025 we sought to agree with you the appropriate traffic light rating and associated engagement requirements with the local community, and obtain your comments on the siting and design of the development.
- 4.4 No response was received following this consultation letter.

5. PLANNING POLICY

5.1 The relevant planning policy and best practice framework is found principally within:

- National Policy, especially the National Planning Policy Framework (NPPF)
- Wiltshire Core Strategy Adopted January 2015
- Saved Policies of the Wiltshire Local Plan
- The Code of Practice for Wireless Network Development in England.

5.2 From these documents can be discerned the general policy background that exists for electronic communications development, site specific policies and the key considerations relevant to the siting and design of appropriate electronic communications development. As planning authority, you will be familiar with this framework and so in the interests of brevity, we do not rehearse it back to you in detail, but address instead the principal themes to demonstrate that the application accords with them.

National Support for Modern Communications

5.3 There is significant UK Government support for the delivery of 5G, particularly as this new connectivity will be a step change from earlier generations of mobile connectivity and will be critical to economic growth and sustainable communities. Our accompanying document of national policy '**National Policy - Delivering Ultra Fast Broadband Mobile Connectivity**', sets out how 5G mobile connectivity will underpin the UK Digital Economy and the significant social, economic and sustainability benefits of advanced modern connectivity. It is essential that the planning system looks to support and facilitate new 5G base station installations such as that proposed to meet the Government's Digital Strategy. In addition, modern connectivity, such as 5G, will be essential to help the Government meet its wider sustainability and climate change targets and we explain this in more detail in our accompanying document '**5G –**

5.4 ***Helping tackle climate change***'.

National Planning Policy Framework (NPPF 2024)

Planning policy is provided at the national level by the National Planning Policy Framework (NPPF). It is a material consideration in planning decisions. The NPPF is pro – development with a ‘presumption in favour of sustainable development’ seen as a golden thread, running through both plan making and decision taking’. The thrust of this guidance is positive and a reminder to LPAs that we need to build the requisite infrastructure to enable economic growth. In this regard the Framework can be summarised as follows:

- Government policy is to support high quality communications infrastructure and systems, as essential for sustainable economic growth;
- Government policy is to keep the inevitable environmental impact associated with electronic communications development to the minimum;
- The keyway to minimise environmental impact is to avoid the unnecessary proliferation of new radio masts and sites;
- Great weight should be given to conserving landscape and scenic beauty in certain specified designated landscapes, e.g., National Parks, Areas of Outstanding Natural Beauty, Conservation Areas, etc.;
- The emphasis on minimising environmental impact is greater per the sensitivity of the site. The emphasis on exploring and utilising site sharing opportunities is consequently higher in these circumstances;
- Best practice encourages a consultative approach and one that seeks to minimise potential visual impact and
- The starting point for planning new networks or the expansion of existing networks is, therefore, to use existing electronic communications sites owned by other operators or radio site management companies.

The NPPF as a whole is aimed at encouraging a more positive approach to town planning. While the NPPF builds environmental protection into the definition of sustainable development, there is also a very clear emphasis that local planning authorities should be looking for ways to help development come forward and not reject applications simply on environmental grounds. This is emphasised in paragraph 10 of the NPPF, which states that in order that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development. The NPPF recognises that this is especially relevant where a development might have other significantly important benefits such as being essential to meet, for example, sustainable economic growth or a national need which can include upgrading to or the provision of new infrastructure.

It is important to reflect on some key points within The Framework which are relevant to the very important development at this site and the general planning principles that should apply when determining the merits of the application:

- a. Paragraph 7 advises that the purpose of the planning system is to contribute to the achievement of sustainable development. It then states that: “At a very high level, the objective of sustainable development can be summarised as meeting the

needs of the present without compromising the ability of future generations to meet their own needs.” [our emphasis];

b. Paragraph 11 advises that authorities should:

- “positively seek opportunities to meet the development needs of their area” [as part of plan making];
- meet objectively assessed needs unless the adverse effects would “significantly and demonstrably outweigh the benefits”;

As such, development proposals that accord with the provisions of the Development Plan should be approved without delay. In respect of this guidance, the following sections of this statement demonstrate that the proposed development accords fully with all relevant Development Plan and NPPF policies and, therefore, permission should be granted for the development.

The importance of the proposed development in providing the upgrading and expansion of the existing communications network is clearly an important material planning consideration as it directly supports sustainability and is also precisely the type of new digital infrastructure that the NPPF is seeking to support. The development proposed is comparatively small scale, and has been designed in a way that is predominately consistent with the existing infrastructure setup and so should be acceptable in every respect.

However, for completeness we still highlight some of the key points within the NPPF as they help demonstrate why the application should be permitted:

Paragraph 7 advises that the purpose of the planning system is to contribute to the achievement of sustainable development. It then states that: *“At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.”* [our emphasis];

Paragraph 20 advises that strategic policies should *“make sufficient provision for.....telecommunications” and that it should “be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances”*

Paragraph 39, on “decision-making” states that authorities should *“work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible”*.

The NPPF builds on the aspiration to build a strong, competitive economy. Paragraph 81 states: ‘Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking in to account both local business

needs and wider opportunities for development. The approach taken, should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation⁴⁰...

Footnote 42 of the NPPF states: ‘The Government’s Industrial Strategy, *HM Government (2017) Industrial Strategy: Building a Britain fit for the future*’, sets out a vision to drive productivity improvements across the UK, identifies a number of Grand Challenges facing all nations, and sets out a delivery programme to make the UK a leader in four of these: artificial intelligence and big data; clean growth; future mobility and catering for an ageing society.

The NPPF (2024) directly addresses the need for enhanced wireless communication services, first mentioned in paragraph 20, which states that an LPA’s strategic policies must make sufficient provision for:

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

Leading on from this, paragraph 119 states that “*Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high-quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time.....*”. This wording echoes guidance set out in previous versions of the NPPF. However, unlike the previous version it also includes the importance of reliable communications infrastructure for both economic growth and social well-being.

While supported, 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 retains the guidance set out in previous versions of the NPPF version and states that “*Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure*”.

In relation to heritage assets the NPPF states:

Paragraph 202. states heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that

they can be enjoyed for their contribution to the quality of life of existing and future generations.

203. Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

d) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;

e) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;

f) the desirability of new development making a positive contribution to local character and distinctiveness; and

g) opportunities to draw on the contribution made by the historic environment to the character of a place.

215. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use

As can be seen from the above, the NPPF clearly acknowledges the benefits of modern electronic communications and seeks to encourage such development as being essential due to their role in supporting a modern economy, contributing to sustainable objectives, and enhancing local community access to a range of goods and services. Local planning authorities are advised to respond positively to proposals for electronic communications development and this must include an understanding of the associated special problems and technical needs of developing and upgrading communications networks.

Public benefits are defined within the NPPF and could be anything that delivers economic, social or environmental progress. Benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.

Local Policy Considerations

5.4 At local level, the proposal has been considered against Wiltshire Core Strategy

There are no specific telecommunications policies however the general policy are of relevance to the proposal:

Core Policy 51 Landscape

Development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures. Proposals should be informed by and sympathetic to the distinctive character areas identified in the relevant Landscape Character Assessment(s) and any other relevant assessments and studies. In particular, 268 proposals will need to demonstrate that the following aspects of landscape character have been conserved and where possible enhanced through sensitive design, landscape mitigation and enhancement measures: The locally distinctive pattern and species composition of natural features such as trees, hedgerows, woodland, field boundaries, watercourses and waterbodies. The locally distinctive character of settlements and their landscape settings. The separate identity of settlements and the transition between man-made and natural landscapes at the urban fringe. Visually sensitive skylines, soils, geological and topographical features. Landscape features of cultural, historic and heritage value. vi. Important views and visual amenity. vii. Tranquillity and the need to protect against intrusion from light pollution, noise, and motion. viii. Landscape functions including places to live, work, relax and recreate. ix. Special qualities of Areas of Outstanding Natural Beauty (AONBs) and the New Forest National Park, where great weight will be afforded to conserving and enhancing landscapes and scenic beauty.

Proposals for development within or affecting the Areas of Outstanding Natural Beauty (AONBs), New Forest National Park (NFP) or Stonehenge and Avebury World Heritage Site (WHS) shall demonstrate that they have taken account of the objectives, policies and actions set out in the relevant Management Plans for these areas. Proposals for development outside of an AONB that is sufficiently prominent (in terms of its siting or scale) to have an impact on the area's special qualities (as set out in the

relevant management plan), must also demonstrate that it would not adversely affect its setting.

Core Policy 57 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 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.

iv. being sympathetic to and conserving historic buildings and historic landscapes.

v. the maximisation of opportunities for sustainable construction techniques, use of renewable energy sources and ensuring buildings and spaces are orientated to gain maximum benefit from sunlight and passive solar energy, in accordance with Core Policy 41 (Sustainable Construction and Low Carbon Energy).

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).

viii. incorporating measures to reduce any actual or perceived opportunities for crime or antisocial behaviour on the site and in the surrounding area through the creation of visually attractive frontages that have windows and doors located to assist in the informal surveillance of public and shared areas by 286 occupants of the site.

ix. ensuring that the public realm, including new roads and other rights of way, are designed to create places of character which are legible, safe and accessible in accordance with Core Policy 66 (Strategic Transport Network).

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.

xi. taking account of the needs of potential occupants, through planning for diversity and adaptability, and considering how buildings and space will be used in the immediate and long term future.

xii. the use of high standards of building materials, finishes and landscaping, including the provision of street furniture and the integration of art and design in the public realm.

xiii. the case of major developments, ensuring they are accompanied by a detailed design statement and masterplan, which is based on an analysis of the local context and assessment of constraints and opportunities of the site and is informed by a development concept, including clearly stated design principles, which will underpin the character of the new place
xiv. meeting the requirements of Core Policy 61 (Transport and New Development).

Core Policy 58 Ensuring the conservation of the historic environment

Development should protect, conserve and where possible enhance the historic environment. Designated heritage assets and their settings will be conserved, and where appropriate enhanced in a manner appropriate to their significance, including: i. nationally significant archaeological remains World Heritage Sites within and adjacent to Wiltshire iii. buildings and structures of special architectural or historic interest iv. the special character or appearance of conservation areas v. historic parks and gardens vi. important landscapes, including registered battlefields and townscapes. Distinctive elements of Wiltshire's historic environment, including non-designated heritage assets, which contribute to a sense of local character and identity will be conserved, and where possible enhanced. The potential contribution of these heritage assets towards wider social, cultural, economic and environmental benefits will also be utilised where this can be delivered in a sensitive and appropriate manner in accordance with Core Policy 57 (Ensuring High Quality Design and Place Shaping). Heritage assets at risk will be monitored and development proposals that improve their condition will be encouraged. The advice of statutory and local consultees will be sought in consideration of such applications.

Saved Policies of the Wiltshire Local Plan (2011)

The following policies would be of relevance:

BD8 TELECOMMUNICATIONS

Proposals for telecommunications development, including applications for prior approval under the Town and Country Planning (General Permitted Development) Order, 1995, will be permitted provided that:

There is a demonstrable need for the development;

Where proposals are sited within nationally designated areas including Areas of Outstanding National Beauty, it can be demonstrated it is in the national interest and incapable of being accommodated outside these areas;

Opportunities to share existing buildings, masts or other structures have been fully explored; and

Proposals are sited, designed and landscaped so as to minimise impact on the built or natural environment.

Code of Best Practice on Mobile Network Development in England (March 2022)

The Code of Best Practice has been fully revised in March 2022 and is now even more supportive of mobile network provision in line with Government aspirations that everyone should have access to the information superhighway no matter where they are located whether that be in rural or urban areas. This Code provides guidance to mobile network operators, their agents and contractors and equally to all local planning authorities in England. It supersedes the Code of Best Practice on Mobile Phone Network Development (2016).

The principal aim of this Code 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 development of such infrastructure must be achieved in a timely and efficient manner, and in a way, which balances connectivity imperatives and the economic, community and social benefits that this brings with the environmental considerations that can be associated with such development. The Code also has an important role in making sure that appropriate engagement takes place with local communities and other interested parties. The Code also highlights that wireless technology continues to evolve rapidly, and mobile devices are now capable of much more. Second generation (2G) technology gave us voice calls and text messages, 3G led to the launch of smartphones, and 4G, which enabled faster browsing, allowed us to do things like watching videos on the move. 5G, the latest generation of wireless technology, is much faster than previous generations of wireless technology and can offer greater capacity and lower latency, allowing thousands of devices in a small area to be connected at the same time. 5G networks, and future mobile generations, will be vital for a range of Internet of Things uses (IoT) and Smart City applications.

The Code highlights that local planning authorities should support the deployment of digital infrastructure 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 Code highlights the Government's Communications Policy and Planning Policy. It acknowledges that digital connectivity is vital to enable people to stay connected and businesses to grow. Fast, reliable digital connectivity can deliver economic, social and well-being benefits for the whole of the UK. The Code indicates that recent changes in planning policy [and regulation] are intended to align with Government communications policy, where the ultimate goal is to achieve mobile coverage wherever it is needed. Furthermore, Section 2 of this Code also reiterates NPPF guidance in strongly supporting high quality communications infrastructure, which is seen as essential for sustainable economic growth.

The Code acknowledges that there are special operational and technical considerations associated with mobile network development, which have changed over time due to changes in technology and associated changes in demand. The Code acknowledges that all wireless network installations are principally guided by the technical need for the site and the technical constraints placed upon transmitting a signal. It then goes on to state that "the three primary technical and operational considerations for installation sites are: ensuring that wireless infrastructure provides an appropriate level of coverage over the intended geographical area; ensuring that sites have sufficient capacity to meet user demand; and requiring a connection to the wider network 'backhaul'".

It then goes on to state that "With the introduction of 5G, more equipment will be required to provide coverage and capacity. 5G, as well as 4G, are data-driven technologies, and high volumes of data will be transmitted between base stations and wireless devices. 5G will require a denser network of base stations than previous generations, including more fixed line fibre optic cable for reliable and high capacity

backhaul. The siting of 5G installations will be more constrained and guided by these special technical and operational considerations.

Due to the scale and technological constraints of 5G equipment, in some cases previous camouflage design solutions, such as tree mast designs and concealing antennas in flagpoles, may not be practicable or suitable. In these cases, simple designs with particular attention to coloration and finishes may help reduce visual impacts on a site-specific basis”.

In acknowledging the considerations of new technology such as 5G, the revised Code continues to advise that this does not mean that there will not be a need for any new base stations. Indeed, for example, more base stations will be needed in areas where there has previously been only limited or no coverage and where coverage and capacity need to be enhanced in line with Government commitments and customer demand. Similarly, some new sites will be required to replace existing sites that are lost, for example, through redevelopment of an existing building. Some masts may need to be redeveloped or replaced to enable an upgrade in services to take place.

Section 5 relates to mobile connectivity in the 21st Century, explaining that mobile phones and other devices are now everywhere. Mobile connectivity is not just making calls and texts but also mobile broadband. The majority of mobile phones in the UK are Internet enabled smartphones and large numbers of people also now own tablet devices. People are increasingly choosing to access the internet using a mobile device even when they have fixed broadband connection available.

The Code acknowledges that by the second decade of the 21st Century, the greatest increase in traffic across mobile networks was in data i.e., internet use (para 5.3). Paragraph 5.4 states that in terms of the wider economic impact of mobile connectivity, research by Deloitte on the economic impact of mobile broadband across a range of countries, showed that a doubling of mobile data use leads to an increase of 0.5% in the Gross Domestic Product per capita, while another study put the benefit of 4G mobile broadband to the UK economy at £75 billion over a decade. Section 5 of the Code goes on to highlight that connectivity promotes social inclusion. In recent years, more people rely on a mobile phone than they rely on a landline. Furthermore, people on lower incomes are even more likely to live in a mobile only household, or to access the Internet using a mobile connection (para 5.5).

6. DESIGN CONSIDERATIONS

- 6.1 The development proposed is exempt from the requirement to provide a design and access statement under Article 9 of The Town and Country Planning (Development Management Procedure) (England) Order 2015, as amended. However, to assist your consideration of the detail, this section provides a description of the process adopted in the design of the proposals and explains the access considerations. Due regard has been given to the factors addressed from Paragraph 20 of the Code of Practice.

Physical Context

- 6.2 This proposal will see the removal of existing 3no. antennas and replaced with 3no. new antennas and additional 3no. antennas utilising existing support poles on the existing 46.4m lattice tower and ancillary development thereto including removal of 9no ERS units and installation of 21 RRU's. It is acknowledged that a telecommunications base station has already been considered acceptable with full planning permission previously being granted within the AONB and Scheduled Monument Camp. However, due to technical advancement the operator as such is required to upgrade the site and therefore the requirement of this full planning application. It should be noted that equipment will be replaced and some additional added so would therefore be very much seen in conjunction with this existing arrangement albeit wider to the top for structural and technical reasons and would result in less than substantial harm. This was a view taken in recent appeal decision (appeal ref: and APP/X5990/W/23/3327993) whereby the Inspector, in allowing the appeals, concluded the following;

11. *I note that the main parties suggest that the proposal would result in 'less than substantial harm' to the nearby designated heritage assets and that Paragraph 208 of the National Planning Policy Framework (the Framework) would therefore be engaged, thus requiring the less than substantial harm to be weighed against the public benefits. The public benefits are listed within the Appellant's evidence, and include supporting the provision of fast internet and telecommunication connections in this location. Whilst I have not found that there would be any*

harm to heritage assets in this case, for the avoidance of doubt, had I agreed with the main parties on this point, I would have found that the benefits in this instance outweighed the less than substantial harm considered by the main parties.

6.3 The scale, layout and design of the development has been guided by the special 5G technical and operational factors affecting the need to provide coverage to the local area, having regard to the need to minimise visual impact. With regard to the main component elements of the development proposed:

- The antennas are similar to the existing electronic communications apparatus installed on the lattice tower although slightly larger to meet the special technical and operational requirements of 5G. They will therefore be seen in the context of this apparatus and will not appear as incongruous or jarring additions to the building or look out of place within the AONB and Scheduled Monument Camp.
- The apparatus that projects above has been kept to the minimum having regard to the technical parameters and design considerations explained above. The impact on the apparatus remains contained and new views towards this apparatus from elsewhere within the AONB and Scheduled Monument Camp.

Antenna Array

- The numbers of antennas and dishes and their size has been kept to the minimum necessary to provide 5G coverage and to link this site back into the operator's network. The design of these features is very much driven by operational and technical factors.

Additional and Ancillary Equipment

- As stated 9no. ERS units are to be removed and replaced with 9no. RRUS and 12no. additional RRU's which are required to support the antennas functionality. Given the height above ground level and their size they will not be of detrimental harm to the area.

Equipment Cabinets

- The number of radio equipment cabinets and their size has been limited to what is required to meet the operator's current and foreseeable network requirements. The will be internally refresh and not have any visual change.

Access Considerations

- 6.4 Access to the site will be provided from the A4 Road onto private land which is not accessible to members of the public.
- 6.5 Once constructed, the development will be unmanned requiring only periodic visits, typically once every two to three months for routine maintenance and servicing.
- 6.6 In accordance with all relevant health and safety legislation and guidelines, access to the site will be restricted to authorised personnel and the routine maintenance and servicing of the apparatus will only be carried out by properly trained and qualified staff. Electronic communications base stations are specifically designed to prevent unauthorised access by members of the public and, therefore, there is no requirement to incorporate inclusive access arrangements into the proposed layout and design of the development.

Planning Assessment

Modern cities are required to provide both residents and visitors with digital connectivity to enable their day to day living and enjoy recreational activities, all of which contributes to the vitality of the city and its economic and social sustainability.

This proposal would see the upgrading of an existing telecommunications base station to deliver 5G mobile connectivity to meet the Governments Digital Strategy and to bring about the significant benefits associated with this advanced next generation mobile connectivity. As the proposal will be upgrading the site by removing 3no. antennas for 6no. associated antennas and equipment, it is considered that any impact in terms of siting would not be a consideration in this instance given the principle would not be in question given the existing use of the site in hosting telecommunications equipment. Any building or property that has a direct view of the apparatus already has visibility of the existing equipment, to which this proposal is of a similar design and height. It is therefore clear that this proposal would NOT alter the existing landscape setting in any distinguishable manner and thus any harm would be less than substantial and significantly outweighed by the public benefits of providing the latest technology including 5G.

In addition to the above, the replacement antennas and equipment have been designed and placed to minimise impact and integrate seamlessly reducing visual impact upon the setting of nearby heritage assets and the AONB as previously approved. The antennas and equipment have been designed to be as unobtrusive as possible, albeit as stated wider to support the latest technologies including 5G but will not be of detrimental impact to the AONB or Scheduled Monument Camp no more than the existing approved installation. The design and placement of the replacement antennas respects and preserves the surrounding area including the nearby heritage assets and AONB. Thus the proposals are in line with the NPPF and Policies 51, 57 and 58 of the Wiltshire Core Strategy and Policy BD8 of the Wiltshire Local Plan.

The proposed equipment is limited to the minimal operational requirement to ensure adequate capacity and connectivity. This proposal takes advantage of an existing base station to ensure that the number of masts within the Council's area are kept to a minimum. the benefits that this proposal would bring to the wider community greatly outweigh any harm. As a private greenfield site, this proposal ensures that footpaths and the public realm will remain clutter free, accessible, safe and attractive. In

particular, the siting, height, and design of this proposal will not cause harm to the character or appearance of the area. In this instance, the proposal will not be on substantial harm to the surrounding area; but it will provide a great service to the surrounding community whilst meeting the aims of the Governments Digital Strategy.

The Need to Conserve the Historic Environment

Paragraph 207 of the NPPF notes that Local Planning Authorities should take into account the significance of any heritage assets that may be affected by a proposal. This is done to avoid or minimise any conflict between the heritage assets conservation and the proposed development. In this case the site is located within the Chilterns AONB and nearby listed assets. As such, these heritage assets are considered as part of this design and heritage statement.

Heritage Statement

North Wessex Downs an Area of Outstanding Natural Beauty (AONB) Management Plan

The North Wessex Downs National Landscape Management Plan 2025–2030 sets out a clear framework for conserving and enhancing the natural beauty of the designated landscape, which is a primary consideration for development proposals, including telecommunications infrastructure.

While the plan does not provide specific policies for telecommunications development, it establishes overarching principles and priorities that are directly relevant. All development within the National Landscape must actively seek to conserve and enhance its natural beauty, in line with the strengthened statutory duty under Section 85 of the Countryside and Rights of Way Act 2000. Proposals such as telecommunications upgrades should ensure no harm to landscape character, scenic quality, or key views, and where possible deliver enhancements.

The Management Plan requires development to be landscape-led, meaning proposals should respond to the distinctive character, tranquillity, and visual sensitivity of the area. Infrastructure, including upgraded telecommunications equipment, should

therefore be carefully sited and designed to minimise visual impact and integrate with the surrounding environment.

The plan also emphasises the need for high-quality design appropriate to a nationally protected landscape. This includes making use of existing structures where possible, minimising additional visual clutter, and ensuring that any new equipment is proportionate and sensitively incorporated.

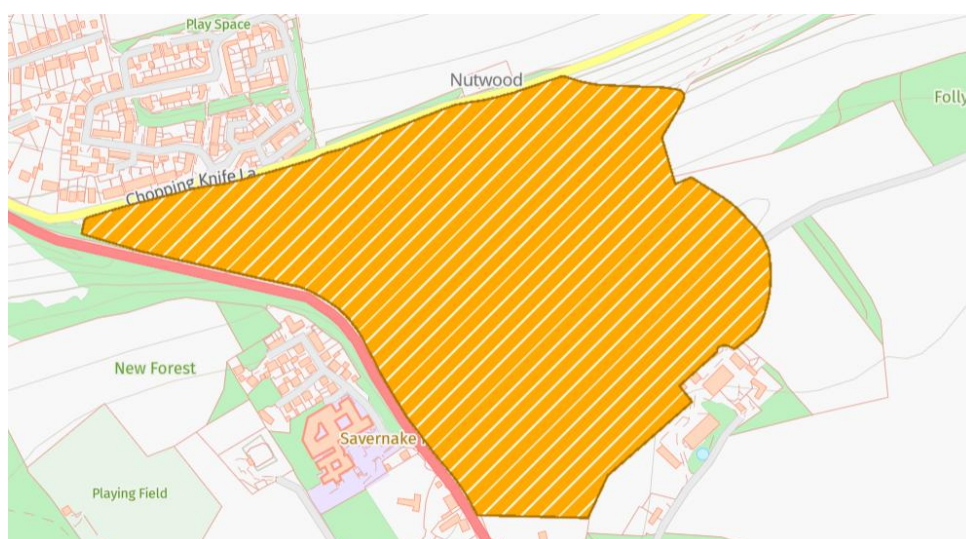
In addition, there is a strong emphasis on protecting both the National Landscape and its wider setting. Development proposals must consider cumulative impacts and avoid harm to key characteristics such as tranquillity, dark skies, and openness.

Finally, all proposals must align with national and local planning policy, which affords the highest level of protection to National Landscapes. Great weight should be given to conserving landscape and scenic beauty, ensuring that any development is justified and appropriately designed.

In summary, although the Management Plan does not specifically address telecommunications infrastructure, it requires that any such development, including the upgrade of an existing lattice tower, must try to minimise visual and environmental impact, and demonstrably conserve and enhance the natural beauty, character, and special qualities of the North Wessex Downs National Landscape.

Camp on Forest Hill Scheduled Monument

This heritage asset is washed over across a large area as shown below:



The Camp on Forest Hill in Mildenhall, Wiltshire is a designated Scheduled Monument, recognised for its national archaeological importance and legally protected under the Ancient Monuments and Archaeological Areas Act 1979. Although the official listing provides limited detail, the site forms part of a rich archaeological landscape in Wiltshire, known for its prehistoric and historic earthworks, barrows, and Roman-era sites. Its scheduling ensures that any work affecting the area requires consent from the authorities, preserving its significance for future study. The monument reflects the long history of human activity in the region and highlights the potential for further archaeological investigation to better understand its origins and function.

Conclusion

The AONB management plan outlines a comprehensive approach to conserving and managing the AONB however lacks specifics relating to telecommunications. In general it aims to balance the preservation with sustainable development, community engagement, and economic vitality. Through coordinated efforts and strategic planning.

The general presumption in favour of allowing development for modern communications, and the special operational and technical factors that require siting of base stations within the setting of heritage assets, is balanced by the need to conserve or enhance their heritage qualities.

However, there is now far greater emphasis that visual impact should not override significant radio planning requirements to achieve mobile coverage to a particular area, particularly with the need to support the massively growing and intensifying demand for mobile communications across the UK. Indeed, in terms of looking to meet operational needs, the NPPF now applies a reduced policy test compared to previous guidance. This helps clarify that an operator is only required to satisfy the normal test of acceptability having regard to all material planning circumstances, rather than looking for the 'optimum' solution as required under the former PPG8.

In balancing these requirements, the starting point for planning new networks or the expansion of existing networks is to use existing electronic communications sites owned by other operators or radio site management companies, such as Cellnex UK. This policy objective is backed with the statutory obligation placed upon operators to

share apparatus, where practicable out under General Condition 3(4) of the Electronic Communications Code (Conditions and Restrictions) Regulations 2003, as amended.

In this instance, the installation of apparatus at this existing site owned or managed by Cellnex UK, where the site is an already established radio base station aligns with this longstanding policy.

Nonetheless, any potential harm the apparatus would cause to the designated heritage asset must be assessed, as set out in NPPF paragraph 207 and how to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal. In this case, all reasonable steps have been taken, through careful siting at an existing Cellnex UK site, to moderate the visual impact of the development, having regard to technical and operational factors. Accordingly, the proposal looks to conserve the heritage asset and in this instance would, by way of siting and appearance, preserve the appearance and setting of the AONB and be of less than substantial harm to nearby heritage assets thus no more impacting than the current acceptable telecommunications site.

In so far as there may be any perceived harm, the development proposal will have less than substantial harm to the significance of a designated heritage asset and as such, this harm has to be weighed against the public benefits of the proposal (paragraph 215). In this respect the base station is required as part of a national 5G mobile communications network, necessary to extend and improve mobile connectivity to the local area and has wider public interests. As explained, the target coverage area falls within the designated area and the special operational and technical requirements necessitate siting of new apparatus within it.

As a matter of principle, the development proposed is in accordance with the relevant policy framework and should be therefore be acceptable.

7. HEALTH AND SAFETY

- 7.1 In support of the application, we include a separate document called '**5G Health and Safety**' which sets out in more detail the associated health and safety considerations. Every installation on a site owned or managed by Cellnex UK will be compliant with international standards adopted by the UK Government. A certificate confirming compliance with the relevant ICNIRP guidelines on public exposure has been supplied with this application.
- 7.2 The ICNIRP guidelines seek to protect against the well-known thermal effects of radio emissions and include a significant precautionary factor. These guidelines apply to all forms of electronic communications and mobile technology is one of the lowest powered of these.
- 7.3 National planning policy remains clear, provided an application is certified as ICNIRP compliant, local planning authorities should not seek to effectively set different guidelines through the refusal of planning permission.

8. SUMMARY AND CONCLUSIONS

- 8.1 In summary, the application is in respect of a 5G electronic communications base station necessary to improve a vital network that provides public services.
- 8.2 The service provided by the operator is in the public interest and is in very high demand, with 5G being the next and highly significant advancement in mobile connectivity. In the UK mobile services now exceed fixed landlines in terms of customer numbers and usage.
- 8.3 The public interest of the system is clear from the considerable benefits that will flow and it makes a significant and major contribution towards sustainable objectives.
- 8.4 The operator's requirement is in the context of network needs associated with a 5G cellular system. These impose particular locational and siting requirements which are even greater with 5G. The technical justification clearly demonstrates the need for this apparatus proposed within the context of the operator's surrounding network.
- 8.5 The operator(s) has followed national and local planning policy and best practice guidance in the siting and design of its apparatus in recognition of the need to minimise visual impact. This has included:
- Network planning based upon existing sites, including those controlled by Radio Site Management companies like Cellnex UK.
 - Siting at an existing electronic communications site to minimise new sites and help avoid the unnecessary proliferation of new radio masts and sites for them.
 - Engagement in accordance with the Code of Practice procedures.
 - An examination of design options to try and minimise potential visual impact.
- 8.6 The proposed antennas will comply with all relevant health and safety requirements and will be compliant with the ICNIRP guidelines. There are no exceptional circumstances in this case and therefore no need to consider health effects and related concerns such as the perception of risk further.
- 8.7 This statement and the other accompanying material has demonstrated that the proposal is in accordance with local policy and national policy set out in particular within the NPPF. In particular it is a form of development that is specifically encouraged as a

matter of principle and in its detail complies with the policy objective of minimising potential environmental impact.

- 8.8 In conclusion, the application is for sustainable development, acceptable as a matter of principle and appropriate in its detail and so one which the presumption in favour of granting approval applies.