

**Our ref: COL.MOD.UK.0009912\_1 - CASTLE COMBE RACING CIRCUIT**

**The Chief Planning Officer  
Wiltshire Council  
Bythesea Road  
Trowbridge  
Wiltshire  
BA14 8JN**

**Email: [developmentmanagement@wiltshire.gov.uk](mailto:developmentmanagement@wiltshire.gov.uk)**

**Date: 5<sup>th</sup> August 2026**

Dear Sir

**EE Ltd**

**Submission of an Application for a Prior Approval Determination**

**Proposed Alterations to Existing Base Station installation at Castle Combe Racing Circuit, Castle Combe, Chippenham, Wiltshire, SN14 7EY, NGR E: 385645 N: 177100.**

On behalf of EE Ltd we submit herewith an application for a prior approval determination for the upgrade of the existing electronic communications installation at the above site. This application follows the completion of our pre-application engagement exercise, reflecting so far as is practicable the guidance and comments offered.

The application is submitted in accordance with the requirements of Part 16 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended, and seeks a determination as to whether the Authority's approval will be required for the siting and appearance of the development.

The application comprises:

- i. The written description of the development: installation of a new 10kVA generator on new concrete foundation. Power duct to be installed from source to generator. Wide cable trunking and ladder to be installed. AMF Panel to be installed on new support pole on cabin base. PSU to be retained. Redundant cabinets to be removed.
- ii. An O.S. site plan scale (1:2500) drawing number 004 showing the location where the apparatus will be installed
- iii. Electronic payment of £701.00 in respect of the application fee
- iv. The Developer's Notice served on the landowner

- v. The Developer's contact details

The following information is also provided to assist with your determination of the application:

- vi. The Authority's 1APP form for telecommunications development prior approval applications
- vii. Drawing reference numbers – 100 and 150 – providing further details of the siting, layout and design of the development
- viii. A letter issued by the Home Office dated 14 March 2025

This letter and the enclosures also provide due notification, as may be required, under the relevant conditions of the Electronic Communications Code (Conditions and Restrictions) Regulations 2003, as amended. In particular, you are given notice of the intention to install the electronic communications apparatus described in more detail in the application documentation (including the scale drawings) and to be located as shown on the application plans.

### **Developer's Contact Details**

All correspondence and queries relating the determination of this application should be submitted to the undersigned.

However, in accordance with the requirements of The Town and Country Planning (General Permitted Development) (England) Order 2015, as amended, any correspondence to the developers should be sent to:

For Cellnex UK:

Email: [planning@cellnextelecom.co.uk](mailto:planning@cellnextelecom.co.uk)

For EE Ltd:

Email: [public.affairs@ee.co.uk](mailto:public.affairs@ee.co.uk)

### **The Scope of the Prior Approval Determination**

The permitted development rights granted by Part 16 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended (the GPDO), exist to facilitate the establishment of modern communications apparatus and infrastructure judged by successive governments to be important to a modern economy and in attaining sustainability objectives.

The permitted development granted subject to the prior approval procedure is similar to the grant of outline planning permission, with details of precise siting and appearance being reserved. This is explained at Annex A Glossary of Code of Practice for Wireless Network Development in England, March 2022. The National Planning Policy Framework is also accordingly clear that permitted development rights should not generally be withdrawn.

As a consequence, the scope of determination does not extend to whether the site selected is needed, as the development is acceptable in principle due to the

rights conveyed by the GPDO. Likewise, whilst information on alternative sites may be supplied by way of background and context, the extent of control on siting is limited to the precise siting on a site and not the general location.

As the principle of development at the application site is permitted by the GPDO, this support letter focuses on the statutory criteria of detailed siting and appearance. In so doing, this is considered against current town and country planning guidance, including the development plan which are material considerations, and with reference to the operational requirements of the operator and the attempts to accommodate the particular requirement.

## **The Proposed Development**

In partnership with Government departments and other partners, the Home Office is replacing Airwave TETRA, the current communications system used by the Emergency Services, with a new system called the Emergency Services Network (ESN). ESN is a critical voice and broadband data communication system running over mobile network. A key requirement of ESN is that it continues to provide coverage for the three emergency services when the service is impacted by events such as power outages, storm damage or vandalism. The Emergency Services Mobile Communications Programme is responsible for delivering ESN for the three emergency services of Fire, Police and Ambulance and to achieve this EE have been instructed to install a new permanent back-up power generator across a portfolio of sites.

The development as proposed comprises:

The proposed development comprises the installation of a new 10kVA standby generator mounted on a concrete foundation located within the existing compound. A new power duct route will be installed between the existing power source and the proposed generator. Associated electrical infrastructure will include the installation of new wide cable trunking and cable ladder systems.

An AMF panel will be installed on a new support pole mounted adjacent to the equipment cabin base. The existing PSU will be retained and remain operational as part of the site's established telecommunications infrastructure.

In addition, a number of redundant equipment cabinets that are no longer required for the operation of the site will be removed as part of the proposed works. The development is intended to enhance the resilience and reliability of the telecommunications installation whilst resulting in only limited physical alterations within the established operational compound.

The emergency services communications network needs to be operational on a continuous basis and therefore it is essential that the site benefits from an emergency 'back up' power supply in case the main grid power supply to the site fails. In practice therefore the back-up generator will only be needed in an emergency situation for example if the existing high-power supply to the site is lost.

This minor proposal will provide a back-up emergency power supply for the Emergency Services network and will therefore support the efficiency of the Emergency Services by allowing them to maintain access to the latest type of data and applications as part of the EE Ltd service provided to the wider area.

In keeping with the NPPF and Code of Practice guidelines, in this instance, the proposal is for the upgrade of an existing telecommunications site. The application site has hosted a telecommunications site for a number of years. The proposal will ensure that power resilience is achieved at this site so that the area does not suffer a catastrophic loss of Emergency Services Network and the EE public coverage in the event of a mains power outage.

The proposed generator is the minimum requirement to achieve the required power resilience. It will be located within the existing fenced compound alongside the existing equipment cabinets/cabins.

The proposal is for the upgrade of an existing site and as such, no alternative site options were investigated. There is a specific requirement to upgrade the existing site as it is the only site in the appropriate location to provide coverage to the wider area, and the upgrade is required to provide power resilience.

We indicated in our prior engagement letter that the Traffic Light Rating was green. The prior engagement carried out suggests this rating to be correct and we have not altered it.

### **Compliance with Planning Policy and Guidance**

In accordance with the Code of Best Practice on Mobile Phone Network Development, and published Government guidance within the National Planning Policy Framework (NPPF), this proposal has been developed having regard to the need for good design.

Central Government attaches great importance to the design of the built environment and outlines this within Section 12 (para. 131) of NPPF. It states, "Good design is a key aspect of sustainable development, creates better places in which to live and work and helps makes development acceptable to communities". In keeping with the NPPF, guidelines for using "high-quality communications infrastructure", the proposed design has been selected to minimise any visual impact upon the designated landscape in which the site is located.

The following general design principles have been taken into account in respect of this proposed telecommunications development within the designated area:

- A proper assessment of the character of the area concerned; and
- That the design shows an appreciation of context.

The apparatus proposed will not bring about any additional requirements with regard to access. Access to this operational site will, therefore, remain the same as the current arrangements.

The principle of a telecommunications base station installation in this location has already been accepted by your Authority, and it has become an established feature within the landscape.

The Government fully supports high-quality communications infrastructure. The NPPF states at paragraph 119 that planning policies and decisions should support the expansion of electronic communications networks.

The special operational and technical factors that require specific siting of base stations should be balanced by the need to minimise environmental and visual impact, and the special qualities of nationally important landscapes such as National Parks and National Landscapes (formerly AONB). In keeping with the NPPF the proposed design has been selected to minimise any visual impact upon this designated landscape.

Having regard to the nature and appearance of the structure as a whole, the proposed works should have no adverse impact, or no more than a minimal adverse impact, on its appearance. The development as proposed should not materially affect the overall appearance of the existing site to any noticeable or adverse degree from any public vantage points.

### **Local Policy Considerations**

The proposed development has been assessed against the relevant provisions of the Wiltshire Core Strategy. Whilst there is no specific policy relating directly to telecommunications development within the Strategy, the proposal is considered consistent with the wider objectives of supporting essential infrastructure. The works are limited in scale and comprise the installation of a power resilience solution and associated ancillary equipment within an established telecommunications compound. The proposal does not introduce a new telecommunications site or materially alter the operational characteristics of the existing installation.

The site is located within the Cotswolds Area of Outstanding Natural Beauty (AONB), where Core Policy 51 seeks to protect, conserve and enhance landscape character. The proposed works are modest in nature and are largely confined to the existing operational compound. The generator associated power infrastructure and AMF panel will be viewed in the context of the existing telecommunications equipment and ancillary development already present on site. The development does not result in any significant encroachment into the surrounding landscape, nor does it introduce prominent new structures that would adversely affect the scenic quality, tranquillity or special qualities of the AONB.

Furthermore, the proposal has taken account of the objectives of the Cotswolds National Landscape Management Plan by ensuring that new infrastructure is appropriately sited within an existing developed area and by minimising visual and landscape impacts wherever possible. The removal of redundant equipment cabinets will reduce unnecessary clutter within the compound, contributing positively to the overall appearance of the site and ensuring that the operational requirements of the telecommunications network are met in a manner that respects the character of the protected landscape.

The proposal further been considered against the North Wiltshire Landscape Character Assessment and its guidance relating to landscape sensitivity. The development is contained entirely within an existing telecommunications installation and therefore does not introduce a new element into the wider landscape. The scale and form of the proposed generator and associated equipment are typical of telecommunications infrastructure and will be seen against the backdrop of existing development within the compound.

Given the limited extent of the proposed works, the retention of the existing site layout and the removal of obsolete cabinets, it is considered that the proposal

will not give rise to any significant adverse effects on landscape character, visual amenity or the key characteristics identified within the relevant landscape character area. The works represent a proportionate upgrade to existing infrastructure and are considered compatible with the landscape sensitivities identified within the Assessment. Accordingly, the proposal is considered to accord with the objectives of both the North Wiltshire Landscape Character Assessment and Core Policy 51 of the Wiltshire Core Strategy.

The proposed development is therefore considered to strike the best balance between meeting the specific network requirements for the operator and minimising environmental impact.

The electronic communications site with the addition of the proposed development will continue to comply with the relevant ICNIRP guidelines on public exposure. A certificate confirming ICNIRP compliance can be supplied on request.

We would be willing to meet with you or assist with any visits to the site and the surrounding area, if this is beneficial to the determination of the application.

Finally, your attention is drawn to the statutory 56 days period for the determination of this application of this nature upon which detailed advice is given at paragraph 101 onwards of the Code of Practice for Wireless Network Development in England.

We trust everything is in order, but if you do require any further information or clarification, please do not hesitate to contact me Caitlyn Richmond (WHP Telecoms Ltd).

Yours faithfully

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*Senior Town Planner*  
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Enc Supporting Documentation