SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Holbeach United FC	Site Address:	Land adjacent to Hollbeach United FC Social Club, Park Road, Holbeach, Lincolnshire, PE12 7PT
National Grid Reference:	E: 536050 N: 325215		
Site Ref Number:	CS_11542203	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: South Holland do not have a publicly accessible mast register.		
Were industry site databases checked for suitable sites by the operator:	Yes	
If no explain why: N/A		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	Yes
Date of pre-application contact:	02/04/2025
Name of contact:	Oscar Patman

[1] Macro or Micro

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Summary of outcome/Main issues raised:
On the 02/04/2025, a pre-application consultation letter and drawings of the proposal were sent by email to The Chief Planning Officer for comment. A response from Oscar Patman was received on 16/04/2025: *"I can confirm that the site is not within Article 2(3) land or a site of special scientific interest. However, the site is within 75 metres of Holbeach Conservation Area; and therefore, considerations should be taken of the potential impact upon the historic environment.* *Therefore, subject to the proposal complying with the requirements of Schedule 2, Part 16, Class A, the Local Planning Authority have no objections at this stage.* *This planning advice is given in good faith but is an officer opinion only and therefore is not binding on any formal decision the Council may make following the receipt of a planning application. If you have any more questions, then please do not hesitate to contact me."*

Annual area wide information to planning authority

Has annual area wide information been provided?	No
If no explain why:	
Summary issues raised: Cornerstone's commercial relationship with VMO2 has changed, effectively increasing their independence to work with other companies in the deployment of mobile infrastructure. It means Cornerstone no longer have visibility of VMO2's full update plan. However, Cornerstone is fully committed to working closely with Local Planning Authorities and following 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 partnerships and will always work with you to deliver improved mobile connectivity.	

Community Consultation

Rating of Site under Traffic Light Model:	~~Red~~	Amber	~~Green~~

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Outline of consultation carried out: Pre-application consultation was carried out with the local councillors for the Holbeach Town Ward (Councillors Nanetta Chapman, Sophie Hutchinson and Tracey Carter), and Holbeach Parish Council. Pre-application consultation letters and drawings of the proposals were sent to these parties by email on 02/04/2025.
Summary of outcome/main issues raised (include copies of relevant correspondence): No responses have been received at the time of making the application.

School/College

Location of site in relation to school/college (include name of school/college): • University of Lincoln, Holbeach Campus • University Academy Holbeach
Outline of consultation carried out with school/college (include evidence of consultation): Pre-application consultation was carried out with the Principles/Chair of Governors of the University of Lincoln (Holbeach Campus) and University Academy Holbeach. Pre-application consultation letters and drawings of the proposals were sent to these parties by email on 02/04/2025.
Summary of outcome/main issues raised (include copies of main correspondence): No responses have been received at the time of making the application.

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

Will the proposed development be on a civil safeguarding area or a defence safeguarding area?	**Yes**	
Has the Civil Aviation Authority/Secretary of State for Defence/operator of the civil safeguarding area or defence safeguarding area been notified?	**Yes**	

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Details of response:
Due to their proximity to the proposal aerodrome notices were sent to Wingland Airfield and Fenland Aerodrome on 09/05/2025. On 11/05/2025 the following response was received from Wingland Airfield: *"The proposal should not cause us a problem as it is in a built up area and therefore the 500' rule should apply."* Copies of the notices, proof of deliveries and responses are enclosed within the submission. Any further responses received will be forwarded to the LPA for consideration.

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	09/05/2025	
A developer's notice and copy of the proposal drawings were emailed to the owners on 09/05/2025. Copy of developer's notice and proof of delivery are enclosed.		

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3. Proposed Development

The proposed site:

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
- significantly reduce the environmental impact of network development

As part of VMO2's continued network improvement program, there is a specific requirement for an upgrade to the existing installation at this location to provide enhanced 4G coverage and capacity, as well as future proof for 5G coverage, ensuring that this area of Holbeach has access to the latest technologies.

The site is an established radio base station comprising a 17.6 metre high monopole supporting 3 no. antennas, with equipment cabinets and ancillary development thereto. It is located on private land in the car park to the north of the social club building, off Park Road. The principle of a base station in this location is therefore accepted.

The proposal comprises the removal of the existing 17.6m monopole and replacement with new 22.50m monopole with headframe supporting the 9 no antennas, together with internal upgrade to the existing ground based equipment cabin, and ancillary development thereto.

The immediate area surrounding the application site predominantly comprises sports grounds, with Holbeach United Social Club football pitch to the west, and the University sports fields to the north and the bowls club and tennis courts to the south. To the east of the site and Park Road/Pennyhill Road are residential properties, the nearest is approx. 50m away from the site and Holbeach Cemetery is to the south east. The mast is sited within the centre of the built form of Holbeach town, approx. 250m to the north east of Tesco superstore, just over 320m south of the A17 and 400m to the north of the High Street.

The site is not within in a Conservation Area, nor within any other Article 3(2) land, nor within the setting of a listed building.

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.

Improving digital infrastructure supports the Government's 'levelling up' agenda, by helping local areas to retain and attract businesses and talent as well as by reducing regional inequalities. The upgraded site will provide additional 4G coverage and capacity which is much needed for reliable connectivity as well as new 5G services and will ensure good quality

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critical infrastructure to support strong inclusive communities and contribute to economic opportunities.

Further information is provided in Section 4 'Technical Justification' below and the additional information sheets, '5G Services' and 'Radio Propagation'.

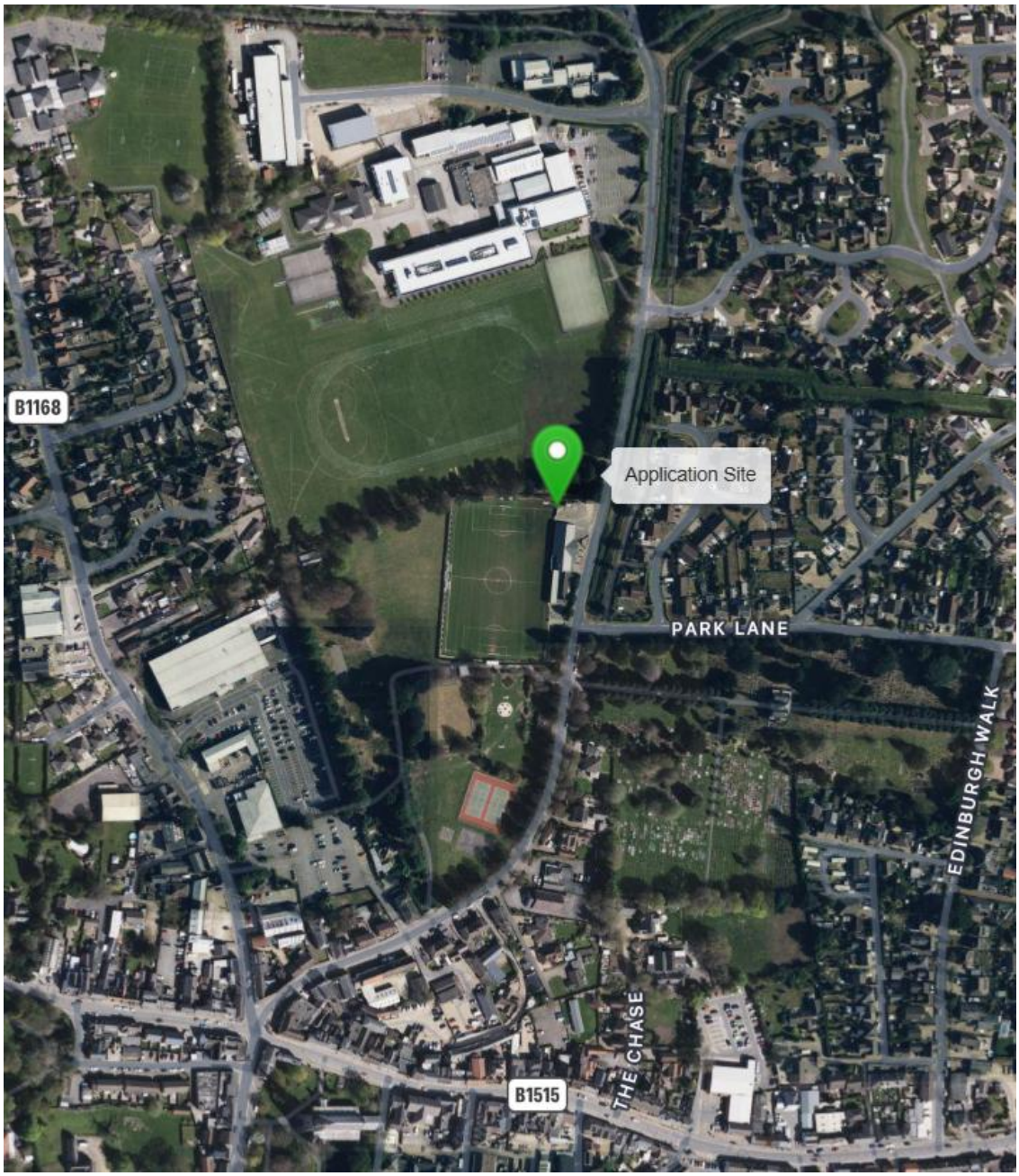


Image 1a: Aerial view of the application site (Source: Grid Reference Finder)

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Image 1b: The application site

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

The amendments to the existing, established ground-based installation will enable enhanced 2G/4G coverage and capacity to the surrounding area as well as future proof for 5G service provision for VMO2 to ensure high quality customer experience is obtained as demands on the network increase and technologies change.

3G (UMTS – Universal Mobile Telecommunications Service) is being phased out by the operators who are soon to switch off their 3G networks in order to enhance 4G/5G services. VMO2 has announced that it will start to switch off its 3G services in 2025 as part of its ongoing network transformation.

https://news.virginmediao2.co.uk/virgin-media-o2-to-begin-switching-off-3g-in-2025-with-enhanced-customer-experience-as-network-evolves/

Type of Structure *(e.g. tower, mast, etc): Phosco phase 4.5 monopole with headframe*

Description:

The proposed upgrade of an existing telecommunications base station comprising the removal of the existing 17.6m monopole and replacement with new 22.50m monopole with headframe supporting the 9 no antennas, together with internal upgrade to the existing ground based equipment cabin, and ancillary development thereto.

Overall Height:	22.50 Metres

In the first instance, all correspondence should be directed to the agent.

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Height of existing building *(where applicable):*	N/A
Equipment Housing: 1 x Cabin (internally refreshed but external will remain as existing)	
Length:	N/A
Width:	N/A
Height:	N/A
Equipment Housing: 1x Meter Cabinet to be removed and 1x Meter Cabinet to remain as existing	
Length:	N/A
Width:	N/A
Height:	N/A
Materials *(as applicable):*	
Tower/mast etc – type of material and external colour:	Steel – Galvanised (Grey)
Equipment housing – type of material and external colour:	Steel – RAL7035 Light Grey (meter cabinet) as existing Steel – RAL6009 Fir Green (cabin) as existing

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

The existing radio base station has been in situ in this location for a number of years and has become an established part of the area. Technological advances and additional demands on the operator's mobile network system in the area have meant that upgraded 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 means that the existing tower is not able to support this new technology and therefore a new larger tower is required.

The proposed tower height at 22.50m is essential in order to provide enhanced coverage to the target coverage area. New 5G radio technologies operate in higher frequency bands than older technologies. Since it operates at higher frequencies where attenuation of the radio signal is naturally higher and the effects of clutter are greater it will normally require a higher structure to achieve the same coverage footprint. To increase capacity and data speeds to the user, the antenna will normally need to be mounted higher than conventional antennae. These factors drive a requirement for a slight increase in antenna height to future proof for 5G service provision.

This is the slimmest design possible which will enable all technologies to be supported from this site. If the column width were to be any slimmer then it would not be capable of supporting the required headframe, the technologies would not fit on the same column and another radio base station would be required, which would lead to the proliferation of masts contrary to national Government guidance set out in the NPPF and the Code of Practice. Similarly, if the column were to be a uniform width throughout then the overall width would have to increase which would appear more visually prominent in the surrounds than the proposed design.

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The design of the tower maintains its simple, functional, vertical structure which will not appear incongruous within the area. The tower is proposed to be galvanised (grey in colour) to match the existing, and will better assimilate with an often grey sky; however, it can be coloured any other colour the LPA consider appropriate if necessary.

The proposal is set back from the highway and sits against a backdrop of mature trees to the north, which measure up to approx. 20m in height. There are also numerous vertical structures at the site and within the wider area which aid in assimilating the proposed upgraded site including the adjacent 18m flood lighting columns, streetlighting columns, flagpole, road signs and telegraph poles with associated overhead lines.

The nearest heritage asset is the Holbeach Conservation Area, the edge of the designation at the junction of Park Lane is approx. 80m to the south of the site. Due to the separation distance, the intervening social build club building and the presence of the backdrop of mature trees the site benefits from it is not considered that the increase in height and width will have a harmful visual impact on the area, nor the conservation area in the wider locality, and the benefits of the proposed enhanced coverage/capacity would outweigh any harm identified. The proposed width of the headframe is the minimum required to support the new antennas, which are heavier than those of earlier technologies.

It is therefore considered that the proposal before you strikes a good balance between environmental impact and operational considerations. The proposed height and design represents the best compromise between the visual impact of the proposal on the surrounding area and meeting the technical requirements for the site. Taking all matters into account it is considered that this proposal, to provide the latest 2G/4G service provision and future proof for new 5G coverage, providing high quality dense coverage and capacity, would not appear out of place within the landscape.

Technical Information

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

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

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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, VMO2 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 VMO2's network, the radio base station that is the subject of this application will be configured to operate in this way. All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation, or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference. The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.		

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

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A mobile phone transmitter is designed to cover a specific area and links its coverage to the next site in the network, creating a patchwork of overlapping coverage 'cells' across the country. So, if a person is on the move, the network will transfer their calls from one site to the next. 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.

There is a specific requirement to upgrade the existing Cornerstone radio base station at this location to allow the operator to enhance its 2G/4G coverage and capacity, and future proofing for new 5G service provision, to this area of Holbeach.

Without this proposed upgrade, the area would be detrimentally affected as there would be no access to the new technologies for customers on the VMO2 network, or for customers of MVNOs who share VMO2 infrastructure (including GiffGaff, Sky Mobile and Tesco Mobile).

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)

In accordance with the licence obligations and advice in the National Planning Policy Framework and the 'Code of Practice for Wireless Network Development in England' the applicant's network rollout team investigated the following siting and design options using this sequential approach to site selection:

- **Upgrading their own existing base stations**;
- Using existing telecommunications structures belonging to another communications operator. i.e. Mast and/ or site sharing, co-location;
- Installations on existing high buildings or structures;
- Using small scale equipment; and finally Erecting a new ground based mast site – (1st) Camouflaging or disguising equipment. (2nd) A conventional installation e.g. a lattice mast and compound.

As the proposal seeks to upgrade the existing coverage and capacity within the area, it is important that any potential alternative sites are located close to the existing, so that it would be capable of covering the same target coverage area. The other nearest existing masts are over approximately 300m and 800m to the south west and south of the site and there are no alternative solutions in the immediate vicinity of the existing site. Neither of which are located in a suitable position to provide sufficient replacement coverage, nor are they structurally capable of withstanding the weight of multiple providers nor the new technologies required by the operators.

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Site	Site Name, Address, NGR, Site Type	Reason for not Choosing
D1 – Existing OLO Telecom Site	EE 83298, Boston Road South, Holbeach, PE12 7LY (NGR: E535871, N324954)	This is the nearest OLO mast in relation to the existing site, this site was discounted as it is not possible to share the existing structure as the design of the existing column would not be structurally capable of supporting another operator's equipment. Also it would not sufficiently replace the coverage for the area that is currently being provided by the existing site.
D2 - Existing OLO Telecom Site	Land at Holbeach Fire Station, Station Street, Holbeach, PE12 7RD (NGR: E535813, N324460)	This existing OLO mast was discounted as it is did not meet the radio planner's requirements, it is too far from the existing mast site.
D3 - Rooftop	Tesco, Boston Road South, Holbeach, PE12 7LR (NGR: E535843, N325112)	The rooftop is too low in order to deliver the required level of coverage to the target coverage area. This site has therefore been discounted for this reason.
D4 - Rooftop	University Academy Holbeach, Park Road, Holbeach, PE12 7PU (NGR: E536015, N325401)	The university buildings are either of pitched roof construction or of a design which is unsuitable for the siting of telecoms equipment. The applicant is only able to utilise flat concrete roofs that have the capacity to support other plant eg Air Handling Units. The applicants are not able to fix equipment to other types of roofs. The majority of the time the applicants need to fix to a solid support structure that can support the antenna loads in all directions such as a gable wall that has lateral support along the length of the roof. Notably, roof trusses are not considered suitable structures.
D5 - Rooftop	Holbeach FC Tigers Bar and Social Club, Park Road, Holbeach, PE12 7PT (NGR: E536055, N325187)	The rooftop is pitched and is too low in order to deliver the required level of coverage to the target coverage area. This site has therefore been discounted for this reason.

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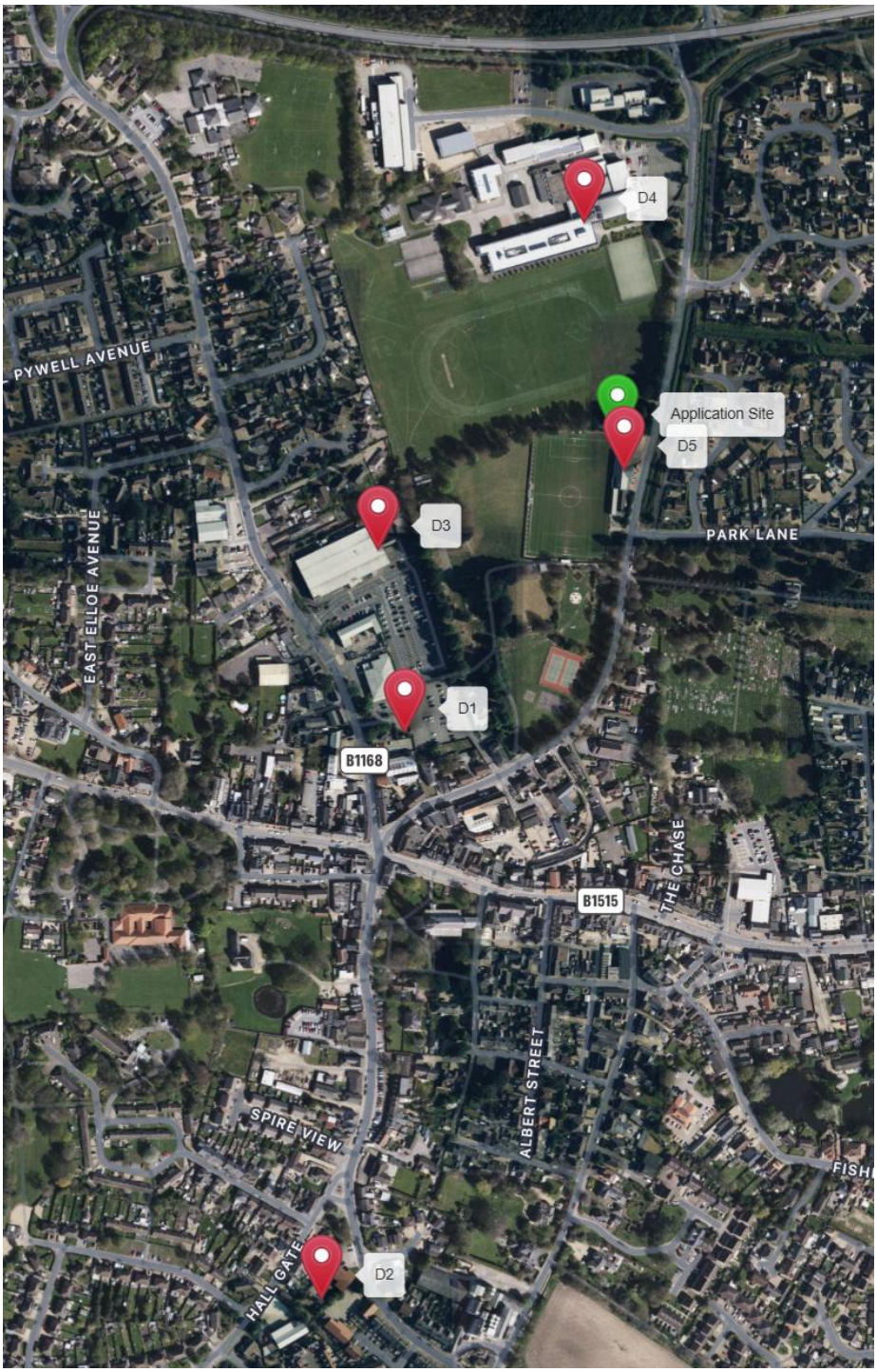


Image 2: Map of discounted sites (red pins) and application site (green pin) (Source: Grid Reference Finder)

Link to map of discounted sites:
https://gridreferencefinder.com/#gr=TF3605025215|Application_s_Site|2,TF3587124954|D1|1,TF3581324460|D2|1,TF3584325112|D3|1,TF3601525401|D4|1,TF3605525187|D5|1

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

In accordance with the licence obligations and advice in the NPPF, the applicant's network roll out team followed a sequential approach when seeking to improve coverage/capacity and future proof for 5G services to the area.

The applicant's site selection strategy is to keep the overall environmental impact to a minimum. Utilising existing masts is always progressed where it is technically and legally possible and where it is the local planning authority's preferred environmental solution.

The proposal is for the upgrade of an existing site and therefore alternative sites, which would all involve the installation of an additional structure, were discounted on visual amenity grounds. The upgrade of the existing site is considered to be the preferential option as it will ensure that all operators remain sharing the same structure, in line with NPPF. Although the upgraded tower will be taller and wider than the existing, this is necessary due to the multiple technologies that VMO2 will offer from this site (2G, 4G and future proof for 5G, with 3G available until the switch off in 2025). The proposed upgrade ensures that the visual impact of the development on the surrounding area is minimised, so far as is practicable.

Land use planning designations:

The site is not located in Article 2(3) land. There are no known designations at the time of submission.

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 (February 2025)

The Government's National Planning Policy Framework (NPPF) was published on 24 July 2018 and updates the 2012 version. In February 2019 the NPPF was revised again, with minor alterations to wording relating to housing supply and not any parts relating to telecommunications. The NPPF was updated in July 2021, in order to strengthen sections including requirements on improved design quality, a new requirement for Councils to produce local design codes or guides, an emphasis on using trees in new developments, revised policies on plan-making, removing statues and opting out of PD rights relating to residential conversions. It was most recently updated again in December 2023, in relation to a number of themes including; flexibility for planning authorities in local housing need, clarification of Green Belt boundary alterations and acceptable brownfield development

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within the Green Belt. It strengthens the importance of building 'beautifully' and respecting the character of an area. It removes the need for annual five-year land supply updates, and protects neighbourhood plans from speculative development for five years. Also, the update encourages community-led and self-build developments and further protects agricultural land in its availability for food production. In December 2024 and February 2025, further updates took place, reversing a number of the previous revisions from December 2023, and to correct cross-references from footnotes published in December 2024. The recent updates do not change any parts relating specifically to telecommunications development, other than the paragraph numbers.

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 119 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 119. It notes that policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time. The economic and social benefits of providing high quality and reliable communications infrastructure are well documented and can be found later in this Supporting Information Statement.

The NPPF supports the expansion of telecommunications:

"*Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G)…*" (para. 119).

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

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

At the heart of the NPPF is the retained presumption in favour of sustainable development (para 11). For decision-taking this means approving development proposals that accord with an up-to-date development plan without delay or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless the application of policies within the revised

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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 where possible"* (emphasis added).

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

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

Code of Practice for Wireless Network Development in England

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 public bodies, local planning

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authorities, and protected landscapes. This document replaces the previous Code of Best Practice on Mobile Network Development, which was published in 2016 and is now published by DCMS.

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

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

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

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

The CoP sets outs 'How wireless networks function.

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

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

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

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

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

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

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- ***"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 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,*

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computer-based planning tools to predict levels of signal strength and coverage from sites for 2G, 3G, 4G and now 5G. Once an operator has identified a requirement for a new cell site, a suitable site needs to be found. Elements that make a site favourable include: having existing or ready access to a power supply, access to fibre optic cables, vehicular access, and, other buildings and development which may provide a level of existing screening. Operators will typically look to upgrade existing infrastructure prior to considering a new deployment, in particular for initial 5G deployment'.

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

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

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

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

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

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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'.*

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

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

Local Policy

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

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The Development Plans for the South Holland Council area comprises:

- South East Lincolnshire Local Plan 2011 – 2036

South East Lincolnshire Local Plan 2011 – 2036 (adopted March 2019)

This adopted Local Plan has been produced by the South East Lincolnshire Joint Strategic Planning Committee (the Joint Committee). The Joint Committee is a partnership of Boston Borough, South Holland District and Lincolnshire County Councils who have worked together to create a single Local Plan for South East Lincolnshire.

The Local Plan will guide development and the use of land in South East Lincolnshire from 1 April 2011 to 31 March 2036 and will help to shape how the area will change over this period. The Local Plan must be based upon adequate, up-to-date and relevant evidence about the area's characteristics and future prospects and must reflect the vision and aspirations of the local community.

The South East Lincolnshire Local Plan's Vision states:

"By 2036 growth will be concentrated in South East Lincolnshire's most sustainable settlements, taking into account the sensitivity of the predominantly rural, flat, open landscape and the risk of flooding. The majority of development will be focussed in Boston and Spalding, but there will also be an appropriate level of growth in some of the area's smaller towns and villages to ensure that they remain resilient and sustainable.

The delivery of new sustainably-designed homes (both market and affordable), as well as additional employment opportunities, will meet the needs of all the population. This will be supported by the necessary facilities, services and infrastructure that create healthy, mixed and balanced communities. Through growth, health inequalities and community deprivation will have been reduced. The delivery of all new and/or improved infrastructure to support growth, including strategic highway improvements and measures to reduce the causes and impacts of flooding, will be phased to ensure that new development is both sustainable and deliverable.

South East Lincolnshire will be better connected by sustainable modes of transport, which will help ensure access to key services and facilities and places of employment is more accessible to all, as well as helping to reduce carbon emissions.

New development will be of a high standard of design and will help South East Lincolnshire mitigate and adapt to climate change. The use of renewable energy technologies and sustainable drainage systems will also help minimise carbon emissions and flood risk respectively.

South East Lincolnshire's important heritage and natural assets, landscapes and townscapes will have been protected, conserved, and enhanced where appropriate, to ensure that their inherent social, economic and environmental qualities are retained and that opportunities

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for sustainable tourism can be realised. The economic base of the area will have been strengthened: the growth of existing businesses in food production, processing and distribution will be supported; our high-quality agricultural land will be protected; and opportunities to diversify the economic base within the settlements, and through appropriate development in the countryside, will have been promoted in a sustainable way. This, alongside improved educational attainment, will help to provide residents with access to higher skilled, better paid jobs close to where they live."

The following strategic priorities for South East Lincolnshire are the main principles that will be followed to deliver the Local Plan's vision. The vision and strategic priorities are the starting point for developing the detailed policies and site-specific proposals outlined in the Local Plan.

"Sustainable Development

1. To deliver sustainable development in South East Lincolnshire that seeks to meet the social and economic needs of the area, whilst protecting and enhancing its environment for the enjoyment of future generations.

2. To ensure that the scale, distribution and type of new development is sustainably located to take account of flood risk across South East Lincolnshire.

3. To ensure that development contributes to the provision of necessary physical, social and green infrastructure to deliver planned levels of growth at the right time and to mitigate its impacts on existing communities and the environment."

There are no specific telecommunications policies within the adopted plan, however the following policies are relevant to the proposal:

"Policy 2: Development Management

Proposals requiring planning permission for development will be permitted provided that sustainable development considerations are met, specifically in relation to:

1. size, scale, layout, density and impact on the amenity, trees, character and appearance of the area and the relationship to existing development and land uses;
2. quality of design and orientation;
3. maximising the use of sustainable materials and resources;
4. access and vehicle generation levels;
5. the capacity of existing community services and infrastructure;
6. impact upon neighbouring land uses by reason of noise, odour, disturbance or visual intrusion;
7. sustainable drainage and flood risk;
8. impact or enhancement for areas of natural habitats and historical buildings and heritage assets; and
9. impact on the potential loss of sand and gravel mineral resources"

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"3. Design of New Development

Policy 3: Design of New Development

All development will create distinctive places through the use of high quality and inclusive design and layout and, where appropriate, make innovative use of local traditional styles and materials. Design which is inappropriate to the local area, or which fails to maximise opportunities for improving the character and quality of an area, will not be acceptable.

Development proposals will demonstrate how the following issues, where they are relevant to the proposal, will be secured:

1. creating a sense of place by complementing and enhancing designated and non designated heritage assets; historic street patterns; respecting the density, scale, visual closure, landmarks, views, massing of neighbouring buildings and the surrounding area;
2. distinguishing between private and public space;
3. the landscape character of the location;
4. accessibility by a choice of travel modes including the provision of public transport, public rights of way and cycle ways;
5. the provision of facilities for the storage of refuse/recycling bins, storage and/or parking of bicycles and layout of car parking;
6. the lighting of public places;
7. ensuring public spaces are accessible to all;
8. crime prevention and community safety;
9. the orientation of buildings on the site to enable the best use of decentralised and renewable low-carbon energy technologies for the lifetime of the development;
10. the appropriate treatment of facades to public places, including shop frontages to avoid visual intrusion by advertising, other signage, security shutters, meter boxes and other service and communication infrastructure;
11. residential amenity;
12. the mitigation of flood risk through flood-resistant and flood-resilient design and sustainable drainage systems (SuDS);
13. the use of locally sourced building materials, minimising the use of water and minimising land take, to protect best and most versatile soils;
14. the incorporation of existing hedgerows and trees and the provision of appropriate new landscaping to enhance biodiversity, green infrastructure, flood risk mitigation and urban cooling;
15. the appropriate use or reuse of historic buildings."

Greater Lincolnshire Strategic Infrastructure Delivery Plan

The Greater Lincolnshire Strategic Infrastructure Delivery Plan is the first iteration of what will be an evolving Plan for the area. As part of the Strategic Analysis of the Plan, Communications Infrastructure was identified as a key sector.

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The section states:

"Fast, reliable and comprehensive communications infrastructure is a prerequisite of economic development in the 21st century. Increasingly, communications infrastructure is also seen as essential to social inclusion, as cultural and commercial activities and social services move on-line. In Greater Lincolnshire, the spatial distribution of businesses and people across many small settlements means that the provision of the necessary broadband and mobile telecoms infrastructure is difficult and expensive to provide. This is particularly the case in the Lincolnshire County Council area."

Relevant Government Reports relating to Telecommunications Development

Levelling Up the United Kingdom White Paper 2022

The Department for Levelling Up, Housing and Communities (DLUHC) published the 'Levelling Up the United Kingdom White Paper' on 02 February 2022. Levelling up is a moral, social and economic programme for the whole of government. The Levelling Up White Paper sets out how the Government spread opportunity more equally across the UK.

The 'Levelling Up the United Kingdom White Paper' champions that

> *'the United Kingdom is an unparalleled success story – a multi-cultural, multi-national, multi-ethnic state with the world's best broadcaster; a vibrantly creative arts sector; a National Health Service which guarantees care for every citizen; charities and voluntary groups which perform a million acts of kindness daily; globally renowned scientists extending the boundaries of knowledge every year; entrepreneurs developing the products and services which bring joy and jobs to so many; and millions of citizens whose kindness and compassion has been so powerfully displayed during the COVID-19 pandemic.*
>
> *But not everyone shares equally in the UK's success. While talent is spread equally across our country, opportunity is not. Levelling up is a mission to challenge, and change, that unfairness. Levelling up means giving everyone the opportunity to flourish. It means people everywhere living longer and more fulfilling lives, and benefitting from sustained rises in living standards and well-being.*
>
> *This requires us to end the geographical inequality which is such a striking feature of the UK. It needs to begin by improving economic dynamism and innovation to drive growth across the whole country, unleashing the power of the private sector to unlock jobs and opportunity for all. While there are world-leading and enterprising businesses and innovators right across the UK, economic growth and the higher productivity which drives it has been over-concentrated in specific areas, particularly the South East of England. A long tail of low-productivity businesses and places explain why UK productivity growth is too low compared to competitors. It is vital that we preserve and*

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enhance the economic, academic and cultural success stories of the UK's most productive counties, towns and cities. But it is equally critical that we improve productivity, boost economic growth, encourage innovation, create good jobs, enhance educational attainment and renovate the social and cultural fabric of those parts of the UK that have stalled and not – so far – shared equally in our nation's success'.

The 'Levelling Up the United Kingdom White Paper' states that:

'The UK Government has made progress towards spreading opportunity around the country since 2019, alongside mitigating the worst effects of the pandemic, with: • £5bn for Project Gigabit to bring gigabit-capable broadband to 85% of the UK by 2025, and the £1bn Shared Rural Network deal with mobile operators delivering 4G coverage to 95% of the UK by the end of 2025; • five-year consolidated transport settlements amounting to £5.7bn in eight city regions outside London, £5bn of funding for buses and active travel over this Parliament; and £96bn for the Integrated Rail Plan delivering faster, more frequent and more reliable journeys across the North of England and the Midlands;

Levelling up is not about making every part of the UK the same or pitting one part of the country against another. Nor does it mean dampening down the success of more prosperous areas. Indeed, by extending opportunity across the UK we can relieve pressures on public services, housing and green fields in the South East. And levelling up can improve well-being in the South East by improving productivity in the North and Midlands. So, it is about the success of the whole country: realising the potential of every place and every person across the UK, building on their unique strengths, spreading opportunities for individuals and businesses, and celebrating every single city, town and village's culture. This will make the economy stronger, more equal and more resilient, and lengthen and improve people's lives. The economic prize from levelling up is potentially enormous. If underperforming places were levelled up towards the UK average, unlocking their potential, this could boost aggregate UK GDP by tens of billions of pounds each year. Levelling up skills, health, education and wellbeing would deliver similarly-sized benefits. Accumulated over time, those gains could easily surpass annual UK GDP. Success in levelling up is about growing the economic pie, everywhere and for everyone, not re-slicing it.

The United Kingdom's Geographical Disparities: Drivers and Potential Policy Approaches What does the economic and social geography of the United Kingdom look like? The UK has larger geographical differences than many other developed countries on multiple measures, including productivity, pay, educational attainment and health. Urban areas and coastal towns suffer disproportionately from crime, while places with particularly high levels of deprivation, such as former mining communities, outlying urban estates and seaside towns have the highest levels of community need and poor opportunities for the people who grow up there. These disparities are often

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larger within towns, counties or regions than between them. They are hyper-local and pockets of affluence and deprivation may exist in the same district. Indeed, many of the worst areas of deprivation are found in the UK's most successful cities. While change is possible, in some cases, these differences have persisted for much of the last century. And some of the UK's most successful cities – such as Birmingham, Manchester, Leeds, Glasgow and Cardiff – lag behind their international comparators when it comes to productivity and incomes. What are the current and future drivers of geographical disparities? Over the past century, many trends have combined to create the spatial patterns seen across the UK today. Globalisation, technological progress, advances in transport, logistics and power, and the shift from heavy industry to knowledge-intensive sectors, as well as the rise of foreign holidays and shift from technical training to university education, have had a large and lasting impact on the economic geography of the UK. These dynamics of the global economy have benefited the UK overall, improving productivity, increasing wealth and driving up living standards through more innovation and competition. These dynamics, however, have not had the same positive economic and social impacts across the UK. While London and much of the South East have benefited economically, former industrial centres and many coastal communities have suffered. This has left deep and lasting scars in many of these places, damaging skills, jobs, innovation, pride in place, health and wellbeing. What are the factors that will help drive levelling up? Levelling up requires a focused, long-term plan of action and a clear framework to identify and act upon the drivers of spatial disparity. Evidence from a range of disciplines tells us these drivers can be encapsulated in six "capitals".

- Physical capital – infrastructure, machines and housing.
- Human capital – the skills, health and experience of the workforce.
- Intangible capital – innovation, ideas and patents.
- Financial capital – resources supporting the financing of companies.
- Social capital – the strength of communities, relationships and trust.
- Institutional capital – local leadership, capacity and capability

This White Paper sets out that the new policy regime is based on five mutually reinforcing pillars. Firstly, the UK Government is setting clear and ambitious medium-term missions to provide consistency and clarity over levelling up policy objectives. These missions will serve as an anchor for policy across government, as well as catalysing innovation and action by the private and civil society sectors. These missions are ambitions that the UK Government has for all parts of the UK. Delivering on them, while being fully respectful of the devolution settlements, will require close and collaborative work with the devolved administrations. The missions are rolling decade-long endeavours and will be reviewed periodically by the UK Government. One mission relates to:

"Digital Connectivity

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Mission: By 2030, the UK will have nationwide gigabit-capable broadband and 4G coverage, with 5G coverage for the majority of the population" (my emphasis.

The White Paper notes the pivotal role that 'Digital Connectivity' has in boosting productivity, pay, jobs, and living standards by 'Growing the Private Sector'.

To help drive these improvements, the UK Government is setting four core missions, spanning living standards; research and development (R&D); transport infrastructure; and digital connectivity.

Para. 3.2.4 of the White Paper states *'By 2030, the UK will have nationwide gigabit-capable broadband and 4G coverage, with 5G coverage for the majority of the population. This mission is focused on improving digital connectivity'*.

The case for 'Digital Connectivity' action states:

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

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

The policy programme for 'Digital Connectivity' states:

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

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

The UK Government has also agreed a £1bn deal with mobile operators to deliver the Shared Rural Network programme. This will see operators collectively increase 4G coverage to 95% by 2025. As a result of this collaboration, the vast majority of the UK will soon benefit from improvements to digital connectivity.

5G has the potential to radically change the way people live and make businesses more productive and competitive. *The UK Government's ambition is for the majority of the population to have access to a 5G signal by 2027. Since 2017, the UK Government has provided £200m in funding for 5G Testbeds and Trials, supporting over 200 startups and SMEs across a range of sectors – including healthcare, manufacturing, Agri-Tech and creative industries – to better understand how to use the technology to develop new solutions and services (emphasis added).*

In 2022, the UK Government will publish the Wireless Infrastructure Strategy. This will review how far the private sector will go to deliver wireless infrastructure – including 5G – across the country, and determine whether there are any market failures in places that need to be addressed, and how the UK Government could tackle these.

The West Midlands 5G (WM5G) Testbed started in 2018 with the mission of testing and proving the benefits of 5G to public and private sector productivity, creating jobs and boosting growth. The UK Government has invested £21m over three years, alongside investment from local government and the private sector. By working with local authorities and Mobile Network Operators (MNOs), WM5G has accelerated 5G deployment by over six months, resulting in the West Midlands being amongst the best connected places for 5G in the UK. In addition, WM5G has delivered a number of UK firsts, including a 5G road sensor network, 5G connected ambulance and capsule endoscopy trials, and a 5G application accelerator programme called 5prinG, which has already upskilled over 400 organisations on the benefits of 5G and allowed over 60 startups to develop new 5G products and services. We must ensure that people have sufficient digital skills to reap the benefits and prosperity arising from the digital economy. In 2020, the UK Government introduced a new digital skills entitlement, giving adults with low or no digital skills in England free access to new digital skills qualifications based on employer-supported national standards. The UK Government

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continues to work with local leaders to develop Local Digital Skills Partnerships. These collaborative partnerships are now operating in seven regions across England, with an eighth formally launching in Hull and East Yorkshire in early March. The UK Government will work with devolved administrations to consider how best to share the insights and evaluation of the programme to help build digital skills capability across the UK'.

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 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

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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.

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 is a whole.

Connected Nations 2024

The Spring 2024 update of the Connected Nations report has found that mobile coverage has remained stable for 4G, with around 93% of the UK landmass predicted to have good outdoor 4G coverage from at least one operator. This area includes nearly all the premises in the UK.

For 5G, this has also remained steady, with around 92% of premises being able to get a 5G signal outdoors from at least one mobile network operator.

Connected Nations UK Report 2024

The Connected Nations UK Report 2024 was published on 5th December 2024. It provides updated data on the coverage and usage of fixed broadband and mobile networks within

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the UK, reporting on the further development of 4G networks and progress on the rollout of 5G networks.

The report states that "*the availability of mobile 5G continues to expand, with mobile network operators (MNOs) coverage ranging between 61% to 79% outside premises. However, 5G coverage where all MNOs are present outside premises remains low, at 38% for our High Confidence level. We continue to see significant differences across the UK, with 5G deployed in 42% of sites in urban areas, compared with 16% of sites in rural areas.*"

In relation to 4G technology, the report states:

"*4G remains the primary technology for mobile users, reaching outside more than 99% of UK premises and carries 78% of total mobile traffic data. 4G coverage where it is available from at least one MNO has now reached 95% of the UK landmass (delivering early on one of the key targets for the Shared Rural Network programme), with 4G geographic coverage across individual MNOs in the UK rising from a range of 80-87% last year to 88-89% this year. We note the 4G geographic improvements because of the Shared Rural Network programme.*"

The report also touches upon the phasing out of legacy mobile networks. MNOs have begun phasing out their 3G networks, with two operators having completed the process, and have committed to shutting down their 2G networks by 2033. Over 2 million devices remain reliant on 2G/3G networks, which highlights the need for mobile providers to ensure that their sites are ready for the increased traffic to the more recent 4G/5G technologies.

Online Nation 2022 Report

The 'Online Nation 2022 Report' produced by Ofcom confirms the following:

- UK adults spend almost 4 hours a day online, 3 hours of which are spent on smartphones. (UK young adults (i.e., 18-24 year olds spend approximately 5 hours online and UK adults aged 55+ spend approximately 3 hours online)
- 73% of time spent online/day by UK adults was via a smartphone
- 1 in 5 people use only a smart phone for online access compared with 1 in 10 in 2020

With regards to increased usage of smartphones only for online access the report suggests:

> "*More people are using only a smartphone to go online. People were more likely in 2021 than in 2020 to only use a smartphone to go online (21% vs 11% in 2020)*[2]*. There could be many reasons, but this may be because people were spending more time at home in late 2020 and early 2021 than in late 2021, and therefore used a wider range of devices. It may also reflect the larger screen size and better-optimised app functions of*

[2] Ofcom Adults' Media Literacy Tracker 2021: Core survey IN1. Which of these devices do you use to go online? (single coded) Base: All adults aged 16+ who go online at home or elsewhere (excluding those who did not give a response at the postal survey) – 3,577

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many smartphones, making them easier and potentially more cost-effective to use as a sole device for accessing the internet.

The Report goes on to states that:

> *"In September 2021 73% of the time spent online by UK online adults per day was on a smartphone. UK online adults are also spending slightly more time using tablets than computers, demonstrating that there is a clear preference for using mobile devices to go online. Those aged 25 to 34 spend the highest proportion (85%) of their online time using a smartphone, followed by 35-44s (80%); 15-24s (78%); 45-54s (74%) and those aged 55+ (55%).[3]"*

Therefore, without the improved network coverage and capacity that the proposed essential infrastructure will bring, VMO2's network users living, working and travelling in the local area, and those of the associated MVNOs, will not benefit from reliable mobile digital connectivity when using their smartphones for business, education and personal purposes.

Planning Issues

The main issues arising from this prior approval notification are whether the upgraded monopole, due to its siting and appearance, would result in harm and, if so, whether any perceived harm would be outweighed by the significant social and economic benefits associated with the improvement of existing service and future proofing for 5G provision attributed to the proposal to enable sustainable development and growth across the district and meeting the needs of its communities.

The provisions of the GPDO require the local planning authority to assess the proposed development solely on its **siting and appearance**.

The principle of development has been established by the Government when the new permitted development rights came into force in November 2016 and again in April 2022, which enables sites such as this one to be built, with prior approval for siting and appearance being the only matters that the local planning authority can take into consideration.

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

> *'The statutory requirements relating to prior approval are much less prescriptive than those relating to planning applications. This is deliberate, as prior approval is a light-touch process which applies where the principle of the development has already been established* (emphasis added). *Where no specific procedure is provided in the General Permitted Development Order, local planning authorities have discretion on what processes they put in place. It is important that a local planning authority does*

[3] Ipsos, Ipsos iris Online Audience Measurement Service, 1 September– 30 September 2021, adults age: 15+, UK. Note: Custom data supplied by Ipsos.

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not impose unnecessarily onerous requirements on developers, and does not seek to replicate the planning application system' (emphasis added).

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'.

Siting & Appearance

The principle of siting a base station has already been accepted by the Council a number of years ago in this location. The proposed amendments to the existing base station are in full accordance with the NPPF and vision and objectives of the South East Lincolnshire Local Plan (SELLP). The changes to the existing base station will ensure that 4G services are improved without an additional installation in this part of Holbeach, maximising the use of existing facilities. The Local Plan have a presumption in favour of sustainable development and the proposed amendments fully comply with this policy aspiration.

The upgrade of an existing, established telecommunications site is in full accordance with Policies 2 and 3 of the SELLP, as the proposals have due consideration to the local context in terms of its height, scale, design and massing, it ensure there will be no significant detrimental impact on the wider landscape, nor the Holbeach Conservation Area, as the equipment is sited and designed to ensure that there is minimal impact to the external appearance of the structure. A balance often needs to be struck between technical requirements and visual impact. In this instance, the taller, wider tower is required in order to host the heavier, larger antennas required to provide the latest high quality 4G services to this area of Holbeach.

The proposed amendments have been fully considered. To this end, the height and width of the telecommunications site will increase. The increased height is required to ensure that it can be future proofed to provide 5G coverage to the target coverage area, and the new headframe is required to hold the amount and weight of the antennas. The upgrade of the existing site minimises visual impact and will not detrimentally affect the character of the area and wider conservation area to the south.

Lack of Coverage – Material Consideration

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 upgraded radio base station the operator's customers would not be able to access the 5G network in the future, and due to lack of capacity as the number of users increase, would experience increasing numbers of dropped calls and buffering, leaving them unable to access the internet on their handheld devices.

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The proposed upgrade will help improve the area's economic prosperity, strengthen the urban economy by supporting local businesses to start, grow, adapt and diversify. It will support a better environment for today and tomorrow by reducing the need to travel and in turn minimise carbon emissions. The upgraded radio base station will support the delivery of healthcare provision and accessibility by enabling people greater access to online services, NHS appointment reminders, reminders to take medicines, make appointments etc.

Economic and Social Benefits

When telecommunications proposals are considered, it is necessary to carry out the balancing exercise weighing the need for development and the magnitude of public benefits of the proposed base station against the perceived concerns about the development's visual impact and availability of alternative locations and the possibility to design the scheme differently without impacting the operational needs of the operators.

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

In such instances, as described above, the NPPF supports development that improves the economic, social and environmental conditions in the area. Enhancing the 2G/4G coverage and capacity in this area and providing future proofing for 5G services will fully meet this national policy objective.

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

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

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Paragraph 38 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 enhanced 2G/4G coverage and capacity in this area will fully meet paragraph 38 of the NPPF.

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

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

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

Indeed, MPs have noted in parliament that the UK's Superfast Broadband connectivity was 'relatively poor' and businesses were losing out from patchy coverage.

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

The case for 5G is compelling as it brings 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

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the same time, creating the so-called "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.

The Local Government Association (LGA) has produced a Councillor's Guide to Digital Connectivity and sets out some of the benefits of 5G technology:

- Faster mobile broadband and a more consistent experience in congested areas with a very high number of devices.
- Industrial applications, enabling businesses to improve their productivity, for example through predictive maintenance and real-time analytics.
- Internet of Things (IoT) services, many of which will help council's and businesses deliver services more efficiently including:
    - Transport and logistics: connected parcels and fleet tracking.
    - Health and social care.
    - Environmental monitoring: sensors monitoring air quality and water pollution in real-time.
    - Smart agriculture and smart animal farming, smart retailing.
    - Connected and autonomous cars: allowing cars to communicate with each other, other road users and even the road infrastructure.

On the 29th November 2024, Sir Chris Bryant MP wrote a letter to Council Leaders and Council Chief Executives across the UK in support of digital infrastructure deployment. This letter demonstrates that the Government still consider digital infrastructure to be a high priority.

The letter, entitled '*Supporting digital infrastructure deployment in your local area*' confirms the importance of fast and reliable connectivity to our everyday life, as people increasingly rely on their devices to work, learn and stay connected with each other, demand for greater speeds and more reliable connectivity is growing. Better digital connectivity is also key to delivering faster economic growth and increasing social inclusion. The Government is 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.

The letter points out that 'early participation from local planning authorities can speed up telecoms deployment' and urges Councils to have early and strategic discussions with mobile operators to move applications more quickly through the planning system and help improve mobile coverage and capacity. There is a specific ask in the MP's letter that Councils 'support the deployment of communications infrastructure wherever possible' .

The manufacturing, construction and agricultural sectors were hit particularly hard by the pandemic, and these would benefit significantly from improved connectivity. However, onerous planning rules and loopholes in existing legislation are slowing down the infrastructure upgrades needed to make the most of this mobile revolution in these much-needed industries.

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The delay in gaining planning approvals for digital infrastructure is such that the Prime Minister, Sir Keir Starmer, wrote in The Times on 5th December 2024:

> "*Good homes need to be supported by good infrastructure… Every road, pylon* ***and mast*** *– which connect people to opportunity – must jump through endless hoops, only to be opposed, dragged out, before eventually, if lucky, approved.*" [emphasis added]

The proposed upgrade to the existing installation in this location will allow the operator to provide improved high quality 2G/4G coverage and capacity as well as future proofing for 5G to the Holbeach area, supporting the Government's aim of '*focusing on ensuring that everyone is connected to the information superhighway*' and '*for the majority of the population to have access to a 5G signal by 2027'*. This fully meets the aspirations of the NPPF.

An upgrade of the existing installation in this location will ensure that the expansion of the electronic communications network is facilitated and that high quality communications infrastructure is provided to the immediate area.

Good connectivity allows people to access a wide range of essential services and a further explanation on some of these key benefits is provided below:

Economic benefits

- Creating more productive and cost efficiencies for businesses
- Businesses offering online services can extend their products to a broader audience
- Local areas and businesses can benefit from tourists and visitors as hotels, attractions, and restaurants can be booked online from anywhere in the world
- Business owners and services like doctors can provide a faster and more cost-effective service by offering both online appointments and ordering
- Digital connectivity facilitates economic growth, something which the Government is keen to progress and promote
- 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 facilitate learning on the job procedures, thanks to technologies such as Augmented Reality (AR) goggles, which, for example, can give the likes of engineers real-time instructions on how to fix a machine on a production line.

Social benefit

- Mobile communications can help people to stay in touch wherever and whenever, which can help improve social wellbeing
- Convenient access to online commerce or businesses
- Contacting emergency services is easier, especially in remote areas

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- Giving the ability to manage our personal finances and information 24/7
- Using a mobile wherever you go can provide better personal security
- Having access to social networking sites and applications can keep people entertained with their lifestyles and interests
- Access to real-time transport information or timetables
- Smart meter reads for utilities such as gas or electric
- Contacting local authorities
- Promotion of smarter and productive ways of working. For example, working from home can help minimise commuting which can provide better work and home life balance

Sustainability and Environmental benefits

- Facilitating remote access to services, education, and commerce, reducing the need to travel and in turn minimising carbon emissions.
- Better monitoring and control of energy consumption through climate change technology, smart metering and smart energy grids.
- 5G infrastructure requires fewer heat generating electronic components.
- 5G enabling of the Internet of Things (IOT) sensor deployment can manage and alert us to pollution risks, health hazards and flood risk.
- Provision of smart technologies within the agricultural sector will facilitate more efficient and less wasteful practices helping to limit negative impacts.
- 5G networks allow monitoring of traffic flow resulting in less congestion and better air quality. They also make driverless cars possible; a means of transport that offers better fuel efficiency.
- Smart cities and buildings can rely upon 5G networks to enable buildings and infrastructure to use automated energy saving through better and more efficient lighting, heating, cooling and other operations.

Health benefits

- Support the delivery of healthcare provision and accessibility by enabling people greater access to online services, NHS appointment reminders, reminders to take medicines, make appointments etc.
- Patients across the country are now becoming accustomed to using remote healthcare services such as NHS 111, virtual GP appointments, and ordering online deliveries of essential medical supplies.
- 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.

Education benefits

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- Facilitates access to educational establishment databases or booking systems for securing places for the likes of school dinners, field trips, extra-curricular activities, student/teacher reviews, etc.
- Provides access to school/college/university apps for setting and submitting homework/coursework, ensuring news and notifications are delivered efficiently, and for parent/student/teacher interactions.

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.

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.

Summary

As part of VMO2's continued network improvement program, there is a specific requirement to provide enhanced 2G and 4G services as well as future proof for new 5G coverage in this area of Holbeach, Lincolnshire.

The proposed amendments to the existing Cornerstone base station are minor in nature but will enhance the customer experience for VMO2, which will utilise the Cornerstone

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infrastructure to ensure that the operator's customers are able to continue to utilise their handheld devices for the purposes in which they were purchased.

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

The social and economic benefits of providing continued reliable and high quality mobile broadband connections support sustainable growth meeting the needs of the population and strengthening global competitiveness. This is fully supported by the NPPF, the South East Lincolnshire Local Plan and the Greater Lincolnshire Strategic Infrastructure Delivery Plan. These benefits are strong material considerations which outweigh any perceived loss of visual amenity to the surrounding area.

We confirm that submitted drawings have been checked for accuracy.

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Position:	Consultant Town Planner	(on behalf of Cornerstone)	

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