

## SUPPORTING STATEMENT

### TELECOMMUNICATIONS INSTALLATION

FOR

MBNL  
(EE (UK) LTD AND H3G (UK) LTD)

AT

Storrington Library (North Street) Car Park

Storrington Library Car Park

North Street

Pulborough

Storrington

West Sussex

RH20 4NZ

## SUPPORTING STATEMENT

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Agents REF: 10102048

MBNL REF: 10102048 – Storrington Library (North Street) Car Park

## 1. Introduction

The following application is being lodged by Mobile Broadband Network Limited 'MBNL'. MBNL manages the physical infrastructure that is required by telecommunications operators to provide a communications network. The Company is jointly owned by the mobile operators EE Limited and H3G 'Three'. MBNL are hereby lodging a formal planning application on behalf of EE and Three for a new telecommunications base station adjacent to Storrington Library Car Park, North Street, Pulborough, Storrington, West Sussex, RH20 4NZ.

As outlined within the covering letter, EE and Three have a shared operational telecommunications site within the area of Storrington (operator reference: 94737). The site is positioned upon a free-standing lattice tower within Water Lane Industrial Estate. The lattice tower is owned by another infrastructure provider known as Cellnex. Permission has been secured to redevelop the wider premises which warrants removal of the existing mast. A replacement is therefore needed to ensure vital network coverage and capacity is maintained within the local area.

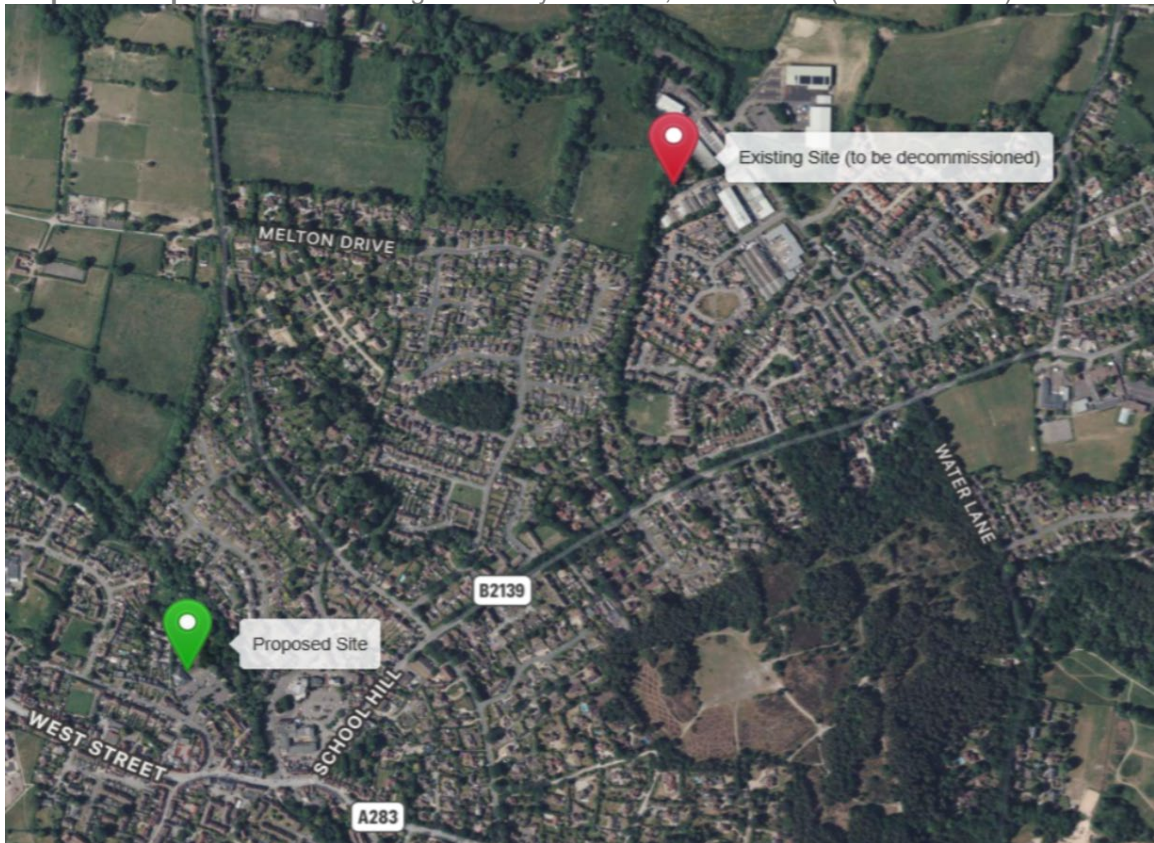
A telecommunications site is responsible for providing coverage to a specific cell (coverage area). The radio antennas will provide a signal to and from mobile handsets and other wireless devices within that area. The size of a cell shall depend upon different factors, including the height of the radio antennas above intervening clutter such as buildings and trees. In general, the higher the antennas above ground, the further the signal will propagate, travelling over such objects which will typically block or hinder the signal.

The existing installation provides an important source of coverage and capacity throughout Storrington and the surrounding area. Following detailed radio planning investigations, EE and Three have determined that a replacement installation (20-metre-high monopole and ancillary apparatus) will be required to ensure continuity of network services, particularly around the centre of Storrington, while future-proofing 4G and 5G connectivity.

Following extensive searches of the surrounding area, the replacement is proposed within Storrington Library (North Street) Car Park, North Street, Pulborough, West Sussex, RH20 4NZ. The proposed scheme forms the basis of this Prior Approval application. The application will be lodged under Part 16 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) and in accordance with the Electronic Communications Code (as amended).

**Figure 1** – Location of the existing site and the proposed replacement.

**Existing Site:** Tesla Engineering, Water Lane Ind. Estate – to be decommissioned (Red Marker)  
**Proposed Replacement** – Storrington Library Car Park, North Street (Green Marker)



## 2. The Proposal

The proposed scheme will involve the deployment of a 20-metre-high Valmont streetworks pole with built-in cabinet which will support 9no. radio antennas, 2no. transmission dishes (each dish will have a diameter of 0.3 metres), along with 5no. cabinets which will sit alongside the pole at ground level. The installation has been designed to support the operational requirements of both EE and Three whilst minimising visual impact and occupied space within the car park. The development will deliver 4G and 5G coverage throughout the area. Further details of the equipment dimensions and finishes are included within the supplementary information document which forms part of this submission.

## 3. The Application Site

The proposed site is located within Storrington Library (North Street) Car Park, to the north of Storrington town centre. The site comprises part of an existing surfaced public car park containing parking bays, lighting columns, signage and other associated infrastructure.

The surrounding area comprises a mixture of community facilities, commercial premises, residential development and highway infrastructure. The application site is positioned within a developed urban environment where telecommunications equipment can be assimilated alongside other vertical structures.

The proposed monopole has been positioned to minimise operational and visual impacts whilst ensuring that the replacement coverage objectives can be achieved. The

equipment cabinets will be grouped together at ground level in a compact arrangement and protected by bollards.

#### **Figure 2 – The proposed site**

The proposed equipment (pole and cabinets) will be set upon the corner of a paved car park to the side of Storrington Library, adjacent to and in proximity of trees and vegetation.



#### **4. Pre-Application Consultation**

The proposed scheme was rated Green under the voluntary Ten Commitments Traffic Light Rating System. In line with the Code of Best Practice, consultation was carried out with the planning department at Horsham District Council.

All of the Mobile Network Operators 'MNOs' including EE and Three, have agreed to carry out informal engagement with local planning authorities in line with industry Best Practice. The consultation protocol has been developed with the support of Government along with other interested stakeholders, including the Local Government Association and Planning Officer's Society. The process is intended to be proportionate and fully appropriate to the development of comparatively small-scale essential public infrastructure and generally outside any formal pre-application consultation process that may have been adopted by a local authority. The co-operation with this informal process is therefore encouraged to help facilitate the balanced deployment of mobile communications infrastructure.

In addition to Horsham District Council, consultation has been undertaken with the following parties:

- The Ward Councillors for Storrington and Washington
- Councillor Paul Marshall (West Sussex County Council)
- Storrington and Sullington Parish Council
- Storrington Primary School – Spierbridge Road, Storrington
- The Nursery School – 24-26 West Street, Storrington
- Browns Lane Pre-School – Ravenscroft Guide and Community Hall, Storrington

Communication was sent to each of the abovementioned parties by email. The email included a site detail sheet outlining the requirement for the planned replacement, maps and imagery, along with a set of drawings. Full details are included within the supplementary information form. The educational establishments fall within a radius of 500 metres of the site and we have sought to inform these parties of the proposed scheme.

In this particular case, EE and Three have a critical requirement for a replacement telecommunications installation following the loss of the existing operational site serving Storrington. The proposed development will ensure that network coverage and capacity can be retained and will support the continued provision of reliable mobile communications services for residents, businesses, educational establishments, emergency services and visitors. Note, EE is the official mobile services supplier for the Emergency Services Network 'ESN', providing critical 4G voice and data communications for the UK's emergency services.

## **5. Application Background**

No applications have been identified which may impact the proposed site.

## **6. The Need for the Proposal**

As outlined above, the proposed development is required to replace an existing operational telecommunications installation that is due to be removed. The planned replacement site has been carefully selected in order to maintain network coverage and capacity, particularly within central Storrington.

A base station operates by receiving and transmitting to mobile devices, such as smartphones or tablets using radio waves. A base station is similar to television and radio reception, except the communication is two way and is achieved by the radio antennas, dishes and other electronic communications apparatus. The main function of the supporting structure is to elevate this apparatus above intervening features such as trees and buildings that would otherwise cause interference.

Properties and buildings within the surrounding area are generally low lying, however, the area does feature a number of trees which have the potential to restrict the signals emitted and received by the transmission equipment (elements affecting radio signals in this way are known as 'clutter'). The existing site is operating from a height of over 20 metres above ground level and the radio planner has determined a minimum pole height of 20 metres will be required to ensure the signals can clear such clutter and achieve the operational requirements of EE and Three in respect of maintaining network coverage and capacity throughout the area. The installation will provide a combination of 4G and 5G network coverage, allowing access to high-speed internet connectivity, benefiting residents, businesses and visitors to the area. Please note that some of the frequencies used for 5G services are higher than those associated with earlier generations.

Without a replacement installation, significant degradation and loss of coverage would occur within the local area, adversely impacting both existing users, including the emergency services and future network demands.

## **7. Site Search/Alternatives Discounted**

To ensure the requirements of EE and Three are retained in respect of maintaining coverage and capacity, the replacement will need to be kept as near to the existing site, as operationally possible. Further details are outlined below.

Details of the alternative sites assessed and discounted are contained within the accompanying Supplementary Information Form.

## **8. Design Statement**

The equipment design is integral to the overall development and its sole function is to support a telecommunications network.

The main element of the scheme is the monopole which shall accommodate a series of radio antennas and transmission dishes (transmission equipment). As detailed within the previous section, this apparatus will communicate with wireless devices such as phones and tablets. The pole will elevate the transmission equipment above the clutter such as trees and buildings which will generally hinder the radio signals sent and received by the radio antennas and dishes.

The associated apparatus will be housed within a series of cabinets positioned alongside the base of the pole. The cabinets will resemble control boxes typically found within town and city centre locations. The apparatus shall have many functions which includes communicating with the transmission equipment housed within the pole (radio antennas/dishes), while providing the apparatus with a source of electrical power.

Please note, the pole is an anti-climbable structure, while the associated apparatus shall be safely secured within the series of cabinets at ground level. Each of the cabinets will be secured, thus preventing unauthorised access.

The proposed equipment has been designed to integrate with the existing character of the car park environment. The monopole adopts a slimline profile and utilises a colour finish intended to minimise visual prominence. The associated cabinets will be grouped together in a compact arrangement at ground level adjacent to existing site infrastructure.

## **9. Access Statement**

Public Access Statement:

“Radio base stations are not designed to be accessible by the public. Therefore, no specific public access provisions are required to be incorporated into the design of the proposal.”

Construction and Maintenance Access:

Access to the site for construction and maintenance will be taken directly from the adjoining car park.

## **10. Health and Safety**

An ICNIRP certificate is included with this application, in accordance with ICNIRP guidelines.

## **11. Planning Policy Framework/Development Plan Policy**

The development plan for the area comprises the Horsham District Planning Framework (2015), together with relevant made neighbourhood plans. A new plan is progressing but has still to be finalised and adopted.

While the development plan does not contain a specific telecommunications policy, the framework supports the provision of infrastructure necessary to support sustainable communities, economic growth and modern communications networks.

The proposed development will:

- Maintain mobile network coverage and capacity.
- Support the continued rollout of advanced digital infrastructure.
- Assist residents, businesses, public and emergency services through enhanced connectivity.
- Utilise a site that has been selected following a sequential site search process.
- Minimise visual impact whilst meeting operational requirements.

The following factors apply:

- The proposed scheme will provide the local area with the latest telecommunications connectivity which includes a combination of 4 and 5G (fourth and fifth generation) coverage, providing users with access to reliable and high-speed internet connectivity and applications 'apps'. The site will also continue to support the Emergency Services Network 'ESN'.
- The site must be positioned within proximity of the intended target/coverage area. In this case, the site has been strategically positioned to ensure it meets operational requirements which includes fitting with other, existing sites/base stations on the wider telecommunications networks of EE and Three.
- The proposed development represents a replacement installation for an existing operational telecommunications site. As such, it will ensure continuity of network coverage rather than introduce a new area of service provision. The site has been selected following a comprehensive search process and the proposed infrastructure has been designed to balance operational requirements with visual considerations.

Other factors which we consider are relevant in support of this application are as follows:

- Mast or site sharing:

Following extensive searches of the surrounding area, no existing masts or structures were identified which could house the required equipment. As outlined within the introduction (Section 1), EE and Three have operational equipment installed upon an existing ground-based mast which is set to be removed. The proposed replacement (the subject of this application) will continue to accommodate both operators by means of a dual-user streetworks monopole. Full details of the discounted sites are included within the supplementary information form.

- Installation on buildings or other existing structures:

Buildings within the surrounding area are generally low lying with no opportunities to house the apparatus on a separate structure or property.

- Installing the smallest suitable equipment, commensurate with technological requirements:

The proposed scheme involves deploying a streetworks installation (pole and cabinets), designed to fit within such urban locations. As above, the installation will support both EE and Three, along with an array of apparatus including radio antennas and transmission dishes. Given the absence of suitable buildings and structures within the vicinity, a streetworks installation is the only available solution which is capable of achieving operational requirements. However, the overall scale and height of the apparatus has been kept to an absolute minimum.

In terms of the associated cabinets, the cabinets are typical of control boxes that are often found within the public highway, car parks and in proximity of buildings. The pole itself will have a built-in cabinet, while a further 5no. cabinets shall be situated adjacent. Overall, the apparatus will occupy significantly less space than a conventional ground-based mast.

- An explanation of how the proposed equipment fits into the wider network:

The proposed site will be designed to maintain network coverage and capacity following removal of the operational site at Tesla Engineering, Water Lane Industrial Estate.

- Details of the design, including height, materials and all components of the proposal:

Full details are included within the supplementary information form.

- Details of any proposed landscaping and screen planting, where appropriate:

Given the nature of the proposed equipment, landscaping and screen planting is not considered appropriate.

- An assessment of the cumulative effects of the proposed development in combination with existing equipment in the area:

As detailed above, the site is required to replace an existing base station within the local area which is to be decommissioned. The application site is not situated within close proximity of listed buildings or sensitive sites.

The proposed site is specifically required to maintain EE and Three's network due to the planned removal of the existing base station as detailed above. Overall, we consider the implementation of this single streetworks installation will balance visual impact with operational requirements.

- A declaration that the equipment and installation is designed to be in full compliance with the appropriate ICNIRP guidelines for public exposure to radiofrequency radiation:

The proposed development will fully accord with the appropriate guidelines for public exposure to radiofrequency radiation and an ICNIRP certificate is included with this application.

- An assessment of visual impact, if relevant:

It is considered factors associated with visual impact are covered above. However, the following factors apply to the siting and design of the proposed site/scheme:

**Siting** – The proposed site has been strategically selected to meet coverage and capacity objectives whilst taking account of operational, technical and environmental constraints. The location provides an appropriate balance between technical performance and visual impact.

**Design** – Due to the slender and uncomplicated design, the monopole is considered an appropriate solution to fit with the surroundings which features low-rise properties. The design has been selected owing to visual impact and operational requirements, incorporating a solution that fits within an urban area, while minimising space when compared with a more conventional installation such as a lattice tower.

**Height** – The height of the proposed structure at 20 metres is required to extend coverage to the surrounding area. The height of the installation has been kept to an absolute minimum.

**Access** – Access will be obtained from the adjoining car park of Storrington Library. Once built, typically 1-2 visits per quarter are anticipated.

## **National Policy**

The Government remain committed to promoting telecommunications and place emphasis on the importance of telecommunications to the wider economy. The National Planning Policy Framework (NPPF August 2026) sets out the Government's planning policies for England and how these are expected to be applied at a local level. It provides a framework within which local people and their representative councils can shape distinctive local and neighbourhood plans, which reflect the needs and priorities of their own communities.

The purpose of the planning system is to contribute to the achievement of sustainable development. There are three dimensions of sustainable development, each of which gives rise to the need for the planning systems to perform a number of roles including;

- Economic Role - contributing to building a strong, responsive and competitive economy;
- Social Role - Supporting strong vibrant and healthy communities; and
- Environmental Role - Contributing to protecting and enhancing our natural, built and historic environment.

The National Planning Policy Framework was revised in August 2026 and sets out the government's policies for England and how these are expected to be applied. These Policies form a material consideration to the application for prior approval. The most recent NPPF demonstrates continued government support for telecommunications infrastructure. Its objective is to “support the expansion and upgrading of telecommunications infrastructure, in ways which limit an unnecessary proliferation of equipment and respect important environmental safeguards. Advanced, high quality and reliable communications are essential to meet changing technological, social, business and security requirements (including through delivering coverage of higher quality standalone 5G in all populated areas by 2030, and nationwide gigabit-capable broadband by 2032).” This proposal demonstrably complies with this objective, for the reasons illustrated above by this report.

The following points apply:

- Operators always follow the sequential approach to site selection. Where an existing site can be shared or upgraded, this will always be adhered to before a new installation is put forward for consideration. In this instance, there is no scope to upgrade existing infrastructure or site share with other operators (note, EE/Three will lose an operational site which warrants the need for a replacement). Please note, the new installation will continue to accommodate both the operators EE and Three.
- Further to the above, there are no alternative buildings or structures which could be utilised to house the required telecommunications equipment. A number of sites have been discounted and the details are included within the supplementary information form.
- The site will provide a combination of 4G and 5G network coverage to the local area, which will be of particular benefit to residents, businesses and visitors. The site will also benefit educational establishments within the local area.
- The site is not within an official safeguarding area e.g. airport.
- A certificate is enclosed with the application to confirm the installation will be in full compliance with the requirements of the radio frequency (RF) public exposure guidelines of the International Commission on Non-Ionising Radiation 'ICNIRP'.

In March 2017, the Department of Culture, Media and Sport (DCMS) released an updated UK Digital Strategy (UK Digital Strategy). The strategy details the goals to ensure that the UK has a “*world-leading digital economy that works for everyone*”. The UK Digital Strategy includes details of the public benefits of access to high quality communication services. As the UK is considered to be behind other nations in the provision of fast, consistent and reliable mobile connectivity, the DCMS, in conjunction with the new Electronic Communications Code (2018), intends to make it easier for operators to upgrade and share their equipment with other operators in order to help increase coverage to ensure the future growth of the UK.

The proposed base station is required to provide the latest telecommunications connectivity for the surrounding area, ensuring a reliable connection into the future following the loss of the existing base station within Water Lane Industrial Estate.

As per the above, the proposed development accords with policies set out in the National Planning Framework (NPPF). In particular, paragraph 119 of the NPPF sets out the importance of the provision of reliable, advanced communications apparatus for economic and sustainable development. In line with these policies, the proposed development will ensure the local area can continue to benefit from reliable, high-speed connectivity, following the planned removal of the existing base station.

## **12. UK Infrastructure – A 10 Year Strategy**

To bolster economic activity and growth, the UK Government have developed a 10 year strategy. Essentially, the Government realise the importance of infrastructure, including roads, railways, airports, water, energy, housing and telecommunications as the lifeblood of the UK economy. The following extract has been captured from the Rt Hon Darren Jones MP, the former Chief Secretary to the Treasury:

*“The United Kingdom is a country with a proud history. From the development of the railways to delivering the 2012 Olympic Games, the UK has been a country that can show the world how to innovate, develop and build the best infrastructure.*

*But after years of erratic decisions, false promises and squeezed capital investment, the UK has fallen behind competitor countries, with productivity falling behind countries such as France, Germany, and the United States. Many investors now question our intent and our capabilities. When we say we will build something, they question if we will and if we can.*

*Why does this matter? Because the economic arteries of the country – from roads, railways and airports to water, energy, digital and housing infrastructure – help deliver a more productive economy. And a more productive economy results in economic growth and better living standards for people in every part of the country.*

*Our goal is to prove to investors that the United Kingdom is not just one of many countries seeking investment, but a country that you can believe in. A country with a government that will roll up its sleeves to make it easier to build, with a clear long-term strategy that gives confidence and certainty in our Plan for Change.*

*And for the businesses and workers who do the hard work of building the infrastructure the country needs, we say to you that you have a government on your side. This 10 Year Infrastructure Strategy, coupled with long-term capital budgets, the modern Industrial Strategy and a commitment to investing in skills and training, presents a lifetime of opportunities.*

*This Strategy is the starting point, not the end. This Strategy is backed up by higher, longer term public-sector capital investment and an updated approach on the role of private capital in partnering with government to deliver. And our online dynamic Infrastructure Pipeline will give investors and businesses a confident operational view of the opportunities ahead of us, and a reason to invest here in the United Kingdom.*

*Alongside this, we have launched the new centre of expertise in government – the National Infrastructure and Service Transformation Authority (NISTA). NISTA brings together the strategic expertise of the National Infrastructure Commission and the project assurance expertise of the Infrastructure and Projects Authority. But we want it to be more than the sum of its parts.*

*Sitting inside HM Treasury, NISTA will play a crucial role in advising ministers on the go/no-go decisions for major projects and infrastructure. It will help government understand if a project has been properly designed, if the supply chain is able to deliver the project to time and budget and if the financing has been adequately put together. NISTA will be challenged by external experts through its Advisory Council and will engage directly with business and investors; whilst supporting other government departments to deliver major projects and infrastructure in line with best practice.*

*This is the first time that the UK has set out a long-term Strategy that brings together economic infrastructure (transport, energy, water and wastewater, waste, digital and flood risk management) with housing and social infrastructure (hospitals, schools and colleges, and prisons and courts). NISTA will oversee the implementation of the Strategy, as well as supporting progress reports to accompany future spending reviews.*

*The government has huge ambitions for the country, but we are committed to doing fewer things better instead of the same things badly. Our inheritance is one of major cost overruns, projects badly off track, and a huge backlog of public infrastructure not being adequately maintained. We have inherited projects where well known failures in good practice persist – failure to properly design and stick to project plans, poor commercial leadership, construction beginning too early, and political decision making that is erratic, short term, and undeliverable.*

*The government is conscious that it can't do everything at once – because of the inherited position of our infrastructure, the fiscal constraints we are working under and capacity in the supply chain. But through our Strategy, our long-term approach and our willingness to reform the system, we will start to turn the corner and deliver the change we promised the UK.*

*Infrastructure – social and economic – will deliver the government's missions to drive growth and raise living standards in every part of the UK. Infrastructure will support our modern Industrial Strategy and provide the certainty businesses need to invest; it will ensure home-grown energy to protect bill-payers and deliver clean power by 2030 and it will improve public services through taking a long-term approach to improving the fabric of our hospitals and our schools.*

*In short, this Strategy sits at the heart of our plans to renew the UK.*

*We will continue to work with businesses, investors, workers and regional and local leaders to drive up ambition and improve delivery. We will start to implement the obvious solutions to the well known problems that led the UK to where it is today. And together, we will get the UK building again and deliver the improvements that are needed to bring about the decade of national renewal that we all want to see take place.”*

The document includes strategy direction for mobile phone and digital services deployment, the main points of which are highlighted below:

#### *Improving mobile networks*

*“3.50 High quality mobile coverage is now a necessity. Yet in many places coverage remains patchy and unreliable. The government has therefore asked Ofcom to provide accurate, public reporting on mobile coverage and performance. Ofcom have committed to launching their improved online coverage checker in June 2025.*

*3.51 Through the Shared Rural Network programme the government has worked with Mobile Network Operators to improve 4G coverage in more rural areas. The programme has already met its target of delivering 95% 4G coverage from at least one Mobile Network Operator and will now continue to deliver into the most remote areas.<sup>123</sup> The government is working with the Mobile Network Operators on interventions in areas which will bring the highest benefits per site, with a focus on coverage to premises and infrastructure.*

*3.52 The government’s ambition is for all populated areas to have standalone 5G by 2030, delivered through commercial investment. It will enable a range of new industrial applications across the economy, including in manufacturing, broadcasting, public services, transport and logistics. An Analysys Mason study\* found that 5G adoption in key sectors could realise up to £37 billion additional Gross Value Added in the period from 2022 to 2035.*

*3.53 The government will also use its purchasing power, through public sector procurement, to show leadership on the take up of new services, including innovative 5G use cases in the public sector, where appropriate. To support further deployment of wireless infrastructure, government will remove barriers to digital infrastructure deployment, including by publishing a call for evidence on changes to planning laws that could enable faster rollout of fixed and mobile coverage.*

*3.54 The mobile market is evolving. Following the Competition and Markets Authority’s approval of the Vodafone and Three merger, Ofcom and the CMA will oversee their commitments to deliver £11 billion investment in standalone 5G networks and 99% population coverage by 2034. BT-EE and Virgin Media O2 also have ambitious plans. To understand the impact of the evolution of the market on the digital sector, the government is carrying out a review of the mobile market. Initial conclusions and next steps will be published by the end of 2025.”*

In terms of this application, the proposed development will be critical to maintaining coverage and capacity within the area of Storrington following removal of the existing site.

### **13. Conclusions**

The proposed scheme is of vital importance to ensure mobile connectivity within the local area is retained following loss of the existing telecommunications site.

The supplementary information document and the other accompanying material, including this planning statement, have demonstrated the proposal accords with the National Planning Frameworks in accordance with local planning policy and NPPF. In particular, it is a form of development that is specifically encouraged as a matter of principle and in its detail, complies with the policy objective of providing services and, at the same time, minimising potential environmental impact.

In conclusion, the application is for sustainable development, acceptable as a matter of principle and appropriate in its detail and so one to which the presumption in favour of granting planning permission applies. We consider the proposed development involving the replacement of an existing installation is fully compliant with the local plan and we would urge Horsham District Council to approve this telecommunication installation.

#### **APPENDICES:**

- |             |                                                                   |
|-------------|-------------------------------------------------------------------|
| Appendix 1: | Supplementary Information Form                                    |
| Appendix 2: | Planning Drawings                                                 |
| Appendix 3: | Copy of the pre-application consultation letters and any response |
| Appendix 4: | ICNIRP Compliance Certificate                                     |