

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Tesco Durrington	Site Address:	Romany Road Streetworks (to east of Tesco car park), Romany Road, West Durrington, Worthing, BN13 3FJ
National Grid Reference:	511252, 104764		
Site Ref Number:	98365	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?	Yes	No
If no explain why: No register available.		
Were industry site databases checked for suitable sites by the operator:	Yes	No
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:	27 November 2025
Name of contact:	Gary Peck

¹ Macro or Micro

Summary of outcome/Main issues raised:

Pre-application correspondence, including a set of drawings detailing the proposed development were sent to Adur & Worthing Councils by email on 24 October 2025.

A response was received on 27 November with the following comments:

"I recognise the necessity to find a new location in this area because of the necessity to relocate the existing mast. I also recognise the difficulties in finding an alternative location as evidenced by the Council's decision to refuse an application at nearby Faraday Close in 2023 which attracted a significant number of objections.

The proposed site could be considered as preferable to the aforementioned site given it potentially impacts upon less residential properties but, as with the previous proposal, it is for a tall mast that far exceeds in height the nearby screening which is in contrast to the current temporary mast to the south and the previous installation prior to that. I am therefore concerned as to the visual impact upon the character of the area.

You state in the pre-application letter that various options have been considered (including the previously refused site) for the siting of the relocated mast and it would be necessary to fully outline these with the reasons for them being discounted in the submission of any application. I consider that in light of the previous objections for the 2023 application, the Local Planning Authority could only consider granting permission if it were fully satisfied that there were no viable alternatives for the relocation of the mast and that the visual impact of the structure had been minimised as much as possible.

I trust the above comments are of assistance. Please note the above comments are at officer level only and would not prejudice any future decision of the Council."

Comments made will be addressed in this document.

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline of consultation carried out:			
The proposal was rated amber in accordance with the traffic light model published within the Code of Practice for Wireless Network Development in England 2022 prior to consultation being undertaken. Correspondence was sent by email on 24 October 2024 to the following stakeholders: - Northbrook Ward councillors - Councillors Mike Barrett and Dom Ford - Durrington Ward councillors - Councillors Josh Harris and Charles James - Durrington Community Centre – 2 Romany Road, Durrington Letters were also sent by post, on 24 October 2025 to the following residential properties: 1 – 10 Shelby Road			

Summary of outcome/main issues raised (include copies of relevant correspondence):
 No responses have been received.

School/College

Location of site in relation to school/college (include name of school/college):
 A search of schools and non-domestic childcare institutions was conducted via Ofsted and Department of Education databases. The nearest school found was Hawthorns Primary School on Poplar Road which is located approximately 330 metres from the site.

Outline of consultation carried out with school/college (include evidence of consultation):
 Given the separation distance, consultation was deemed not to be necessary.

Summary of outcome/main issues raised (include copies of main correspondence):
 N/A

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

Will the structure be within 3km of an aerodrome or airfield?	Yes	No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	No
Details of response: Brighton City Airport is located approximately 8.5km away from the application site. A Safeguarding Notice and drawings were sent to the airport via email on 24 October 2025. A response was received on 27 October 2025, confirming that they had no objection to the proposed development. Copies of correspondence is included with the application documents.		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	19 December 2025	

3. Proposed Development

The proposed site:

EE and H3G currently have a temporary base station located on land on the western side of Romany Road (opposite its junction with Poplar Road) which provides network coverage to the surrounding area. This temporary installation was installed following the removal of equipment from the roof of Columbia House, which was necessary due to the redevelopment of the building. This site is being lost from the network for reasons beyond the operators' control. Therefore, a permanent replacement installation is required to provide continued connectivity to the area.

The proposed site is located on a wide grass verge on western side of Romany Road, immediately to the east of the Tesco car park. The area to the west of the site is predominantly commercial in character, with land to the east of the site predominantly residential in character. The closest residential properties are located to the east of the site on Shelby Road. There is a significant level of street furniture in the area, comprising street lighting, signage, a bus shelter and traffic lights, and there a number of trees and bushes, both close to the site and in the wider surrounding area, which would provide a degree of screening to the proposed development.

The proposed site is shown on the photograph below:



This proposed development, consisting of a 20 metre high monopole supporting 9 no. antennas at the top of the pole, would provide replacement and enhanced 4G coverage and capacity for EE, and H3G (trading as 3), along with new 5G coverage.

Enclose map showing the cell centre and adjoining cells if appropriate:
Network information is provided in the form of predictive coverage plots, later in this statement.

Type of Structure (e.g. tower, mast, etc):	
Description:	
The installation of a replacement telecommunications base station comprising a 20 metre high monopole, with a wrap-around cabinet, supporting 9 no. antennas and 2 no. 300mm diameter transmission dishes, and ancillary development thereto. Prior approval is not required for the proposed cabinets, as they represent Class A(a) permitted development under Part 16 of Schedule 2 of the GPDO, however these are shown on the accompanying drawings for information.	
Overall Height:	20 metres
Height of existing building (where applicable):	N/A
Equipment Housing: See above	
Length:	Metres
Width:	Metres
Height:	Metres
Materials (as applicable):	
Tower/mast etc – type of material and external colour:	Monopole – Steel coloured grey (RAL7035)
Equipment housing – type of material and external colour:	Cabinets – Steel coloured grey (RAL7035)

Reasons for choice of design, making reference to pre-application responses:
In designing the proposed installation, the applicant has sought to achieve a balance between technical requirements and minimising environmental impact as far as was practicable. It, however, must be acknowledged that technical constraints heavily influenced the design and limited the scope to alter the appearance of the site to a significant degree. There are three main elements to a radio base station; the cabin or cabinets which contain the equipment used to generate the radio signals, the supporting structure that holds the antennas in the air or fixes them to a building or structure and the antennas themselves, which emit the radio signals (along with any necessary amplifier or receiver units). Other elements necessary for the base station to function are the links into the network either by fibre cabling or by dish antennas, power source (meter cabinet or generator where a REC supply cannot be utilised), feeder cables that link the equipment housing to the antennas and the various support structures, grillages and fixings, often referred to in general terms as “development ancillary to” the base station. A slim and unfussy design of monopole has been selected as the support structure as it would minimise impact. The site is located on the edge of a commercial area. It is a busy area with significant existing levels of street furniture, particularly around the roundabout to the north of the site. There are lighting columns which would provide a vertical emphasis for the monopole. In addition, there are a number of trees in the area, both smaller specimens close to the site and

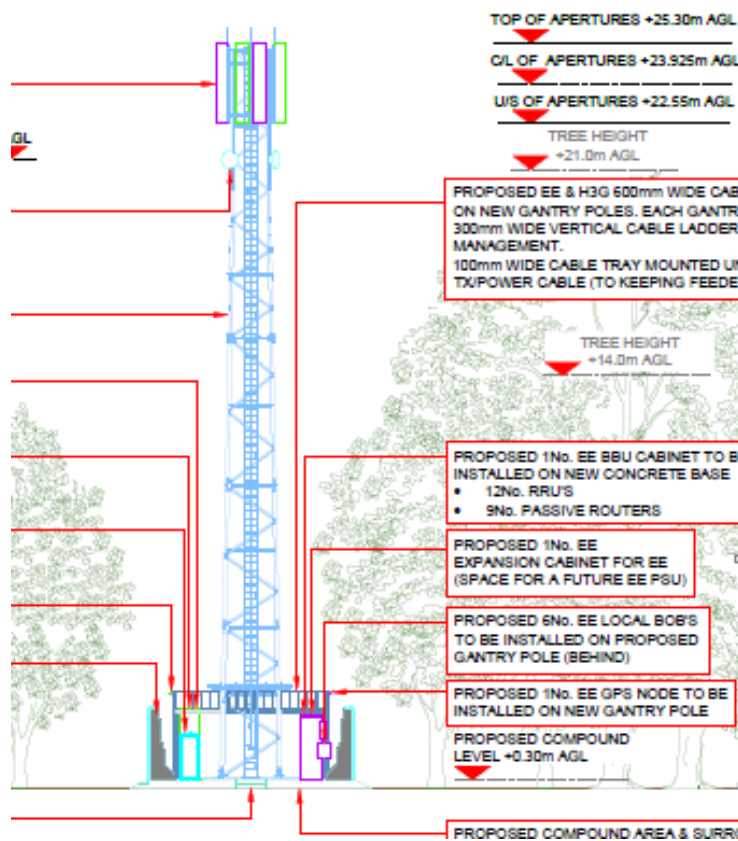
more mature and numerous trees in the wider surrounding area, which would assist in mitigating the impact of the development to an acceptable level. Photomontages have been produced to provide an assessment of how the equipment would appear if built. These will be discussed in greater detail later in this document.

In all aspects of the design now put forward the smallest practical components have been utilised to ensure that the visual impact of the development is kept to the absolute minimum. The height of the proposal was determined by the network radio planners as being the minimum at which the required level of coverage to the target area could be achieved. The site is proposed on a grassed verge, to ensure there would be no impact on pedestrians passing the site.

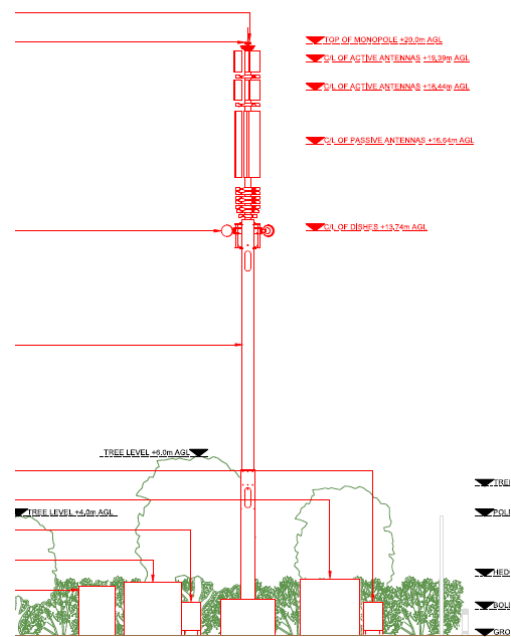
The height of the pole is partly dictated by the use of a slim pole, requiring the antennas to be set out in a 'stacked' formation. 5G antennas for both H3G and EE are proposed at the top of the pole with antennas providing the remaining technologies below. Therefore, there are three stacked sets of antennas, and the lowest need to be at a height above local clutter, and this dictates the overall height of the structure. Alternatives would be to either have a large headframe or propose more than one pole which, in this instance, are not considered as suitable as they would have a far greater impact on visual amenity than one shared structure.

Both the monopole and equipment cabinets are proposed to be coloured light grey. This is considered to be suitable, a standard colour for street furniture, and matching the colour of the lighting columns in the area. Should the Local Authority consider a different colour to be more suitable, then this aspect of the proposed development can be amended. It is clarified that prior approval is not required for the proposed cabinets as they represent Class A permitted development under Part 16 of Schedule 2 of the GPDO, however these are included in this application for transparency.

In terms of the design of the proposed structure, the alternative would be a more substantial lattice style structure which would have a far greater impact on the surrounding area, an issue noted in the pre-application response from the LPA. In 2023, an application was submitted to the south-west of the current application site, at the junction of Romany Road and Faraday close (application reference AWDM/0121/23). This application sought permission for a 25 metre high lattice structure. Although with a good level of screening from trees around the site, it would have had a greater impact than the current application proposal. A snip of the planning drawings is included below for information, alongside a snip of the elevation drawing from the current application (not to scale, however an attempt has been made for the relative heights of the different proposals to be shown as accurately as possible):



Elevation from 2023 proposal



Current proposal

Despite the scale issue, the two extracts clearly show the current proposal is lower, slimmer and a more appropriate design for the area. The LPA pre-app comments also noted the location of the current temporary structure may be more suitable. Should the temp site be utilised, then a similar lattice type structure would be needed, however this would need to be even taller to achieve the current temp site antenna height and allow the antennas to propagate effectively above the trees adjacent to the site. Despite being relatively well screened it is considered this would have a greater impact on visual amenity than the current application proposal.

Overall, it is considered that the design is appropriate to the site and surrounding area and avoids any unacceptable level of impact in terms of visual impact. The minimal impact would be outweighed by the significant public benefits of the proposal in terms of the provision of continued and enhanced connectivity to the surrounding area. As previously noted, the site has been designed to accommodate new 5G technology, introducing ultra-fast mobile connectivity, allowing for higher mobile download speeds and more reliable, quicker phone connections. There would be increased capacity to provide services to a higher number of people at the same time.

There is very limited scope to alter the design in order to meet the technical requirements, nonetheless it is considered the proposal put forward is appropriate to the site and its surroundings and avoids any unacceptable level of impact.

Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)	Yes	No
International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines. When determining compliance the emissions from all mobile phone network operators on or near to the site are taken into account. In order to minimise interference within its own network and with other radio networks, EE and H3G 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 EE and H3G'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

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

Replacement Coverage

The principal aim of the proposal is to provide partial replacement connectivity to the area. The consequence of not doing so is that users of the network would find that the services they previously had access to are either limited or removed. The provision of poor communication services has well recognised socio-economic impacts on communities and businesses.

Because base stations are low powered radio transmitters, they each have a limited range, meaning that they generally need to be located close to the area requiring coverage. If one moves too far away from that area, then it is likely that some areas will remain without the services they previously enjoyed.

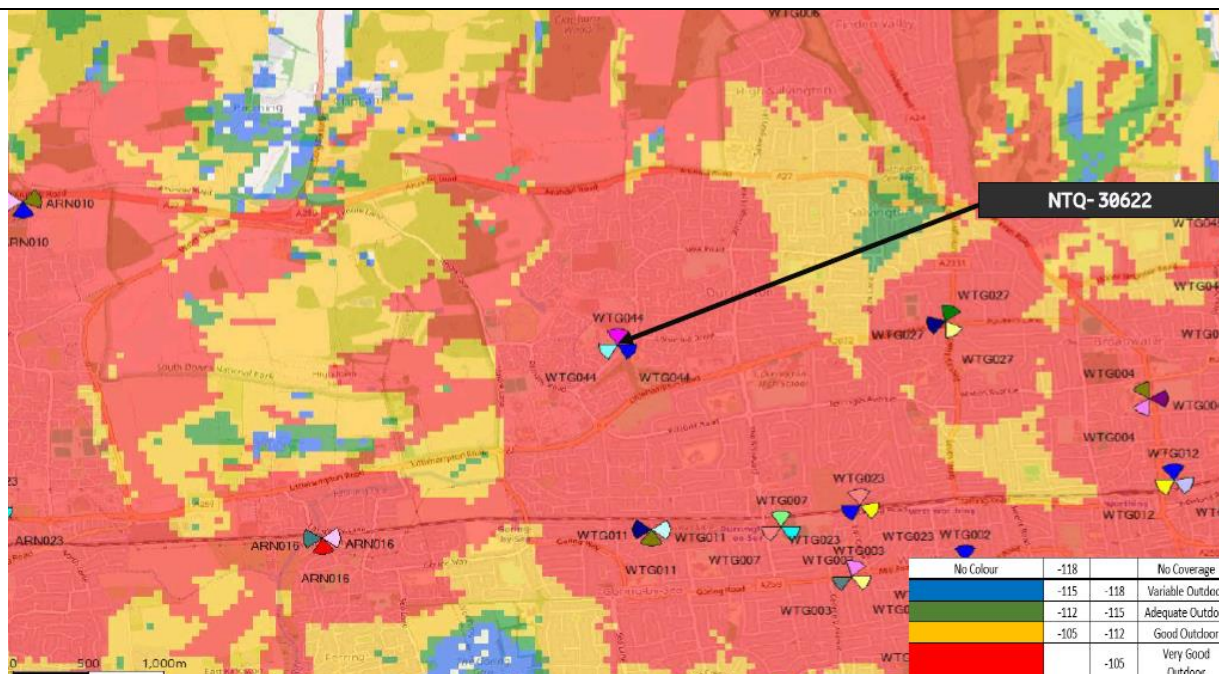
High quality communications infrastructure is essential for sustainable economic growth and high-speed broadband technology, and other communications networks can also play a vital role in enhancing the provision of local community facilities and services.

The UK Government recognises the benefits to commerce, industry and the public in general, and so places great emphasis on the benefits of mobile telecommunications to modern life and this is promoted throughout the planning system. The very high level of mobile phone use and ownership within the UK population is a very clear indication of the public's overwhelming acceptance of the benefits of mobile communications, which requires the installation and maintenance of base stations to provide the necessary connection between the mobile phones and the UK telecommunications network.

Coverage Plots

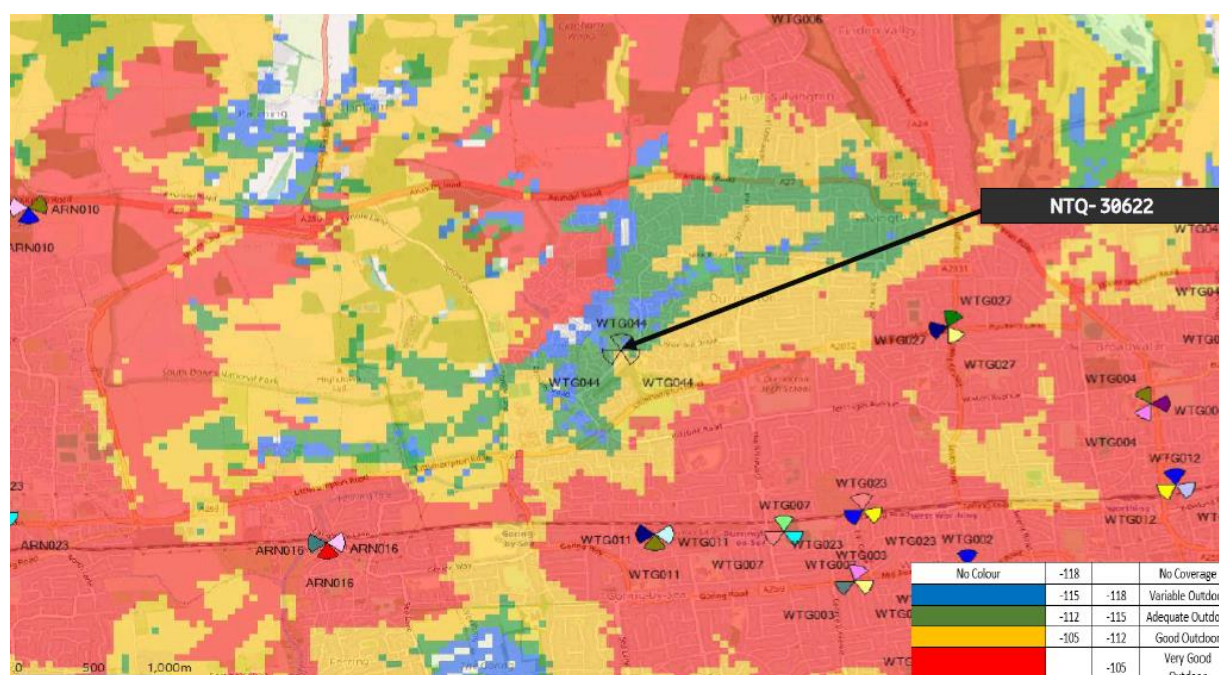
The purpose of the development is to provide replacement connectivity to the surrounding area for EE and H3G with a shared development.

Predictive coverage plots are included with the application to confirm the need for the site. Plots are included within the application to illustrate 4G and 5G indoor and outdoor coverage for H3G, and 4G for EE. Extracts of the plots are included in this document to explain the plots – H3G 4G and 5G outdoor plots are included. For 4G coverage red, yellow and green levels of coverage are required to provide a good level of service (green is an adequate level of coverage). The first extract below confirms the coverage that is provided from the existing temporary installation (annotated as NTQ 30622):



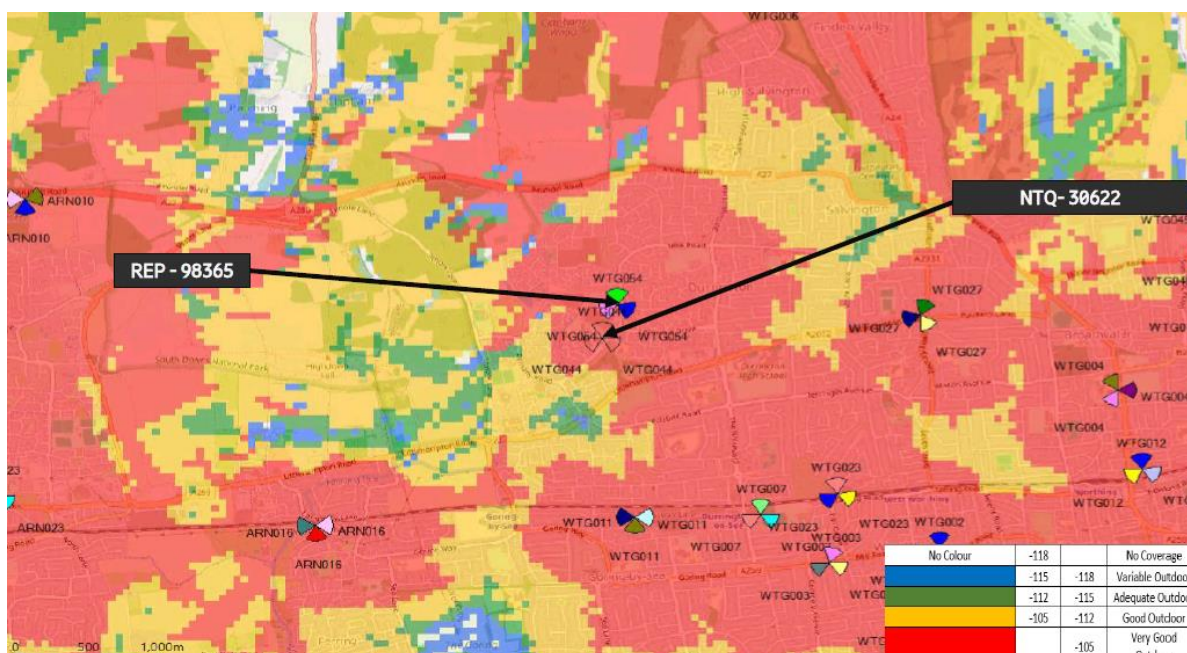
Existing H3G 4G coverage from existing temporary installation

The plot shows an extensive area of coverage from the site, aided by the fact that the temporary structure is 28 metres in height, providing the antennas with an elevated position. The next plot confirms coverage to the area without either the temporary installation or the proposed new installation, showing a significant reduction in coverage to the area:



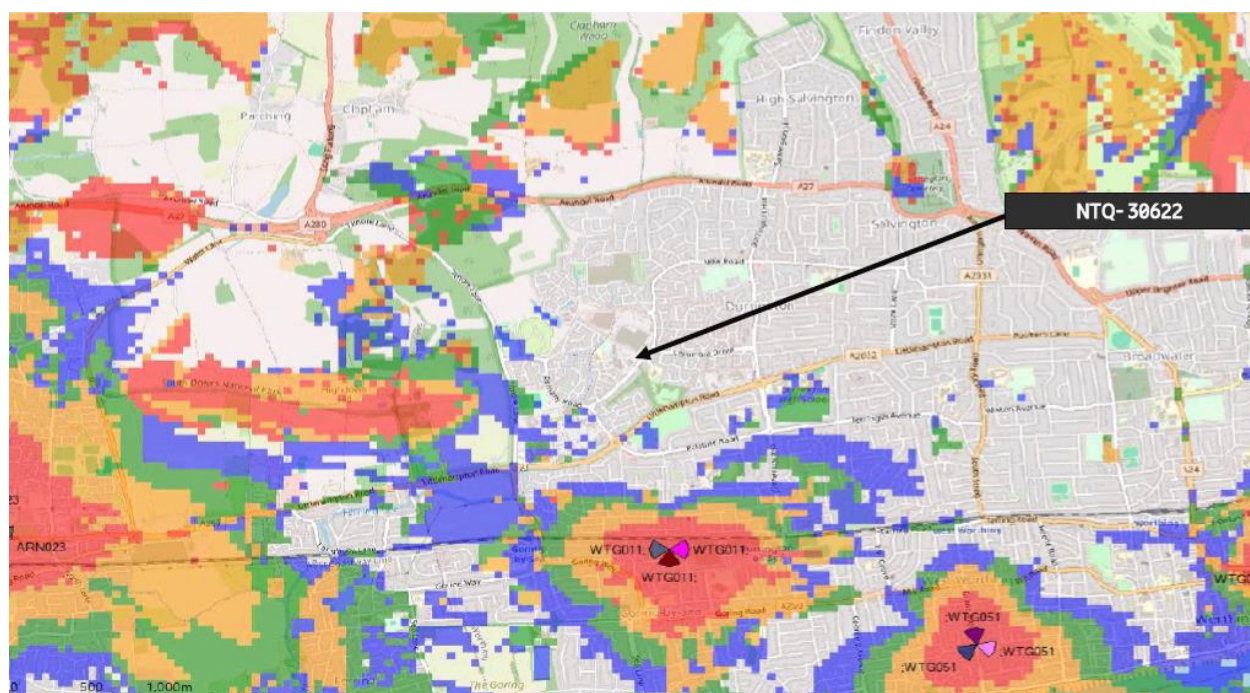
H3G 4G coverage without an installation in the area

The next plot includes coverage from the application site. It can be seen that coverage levels would provide a good level of service, however this is slightly reduced from the temporary installation, explained by the height of the temporary structure:



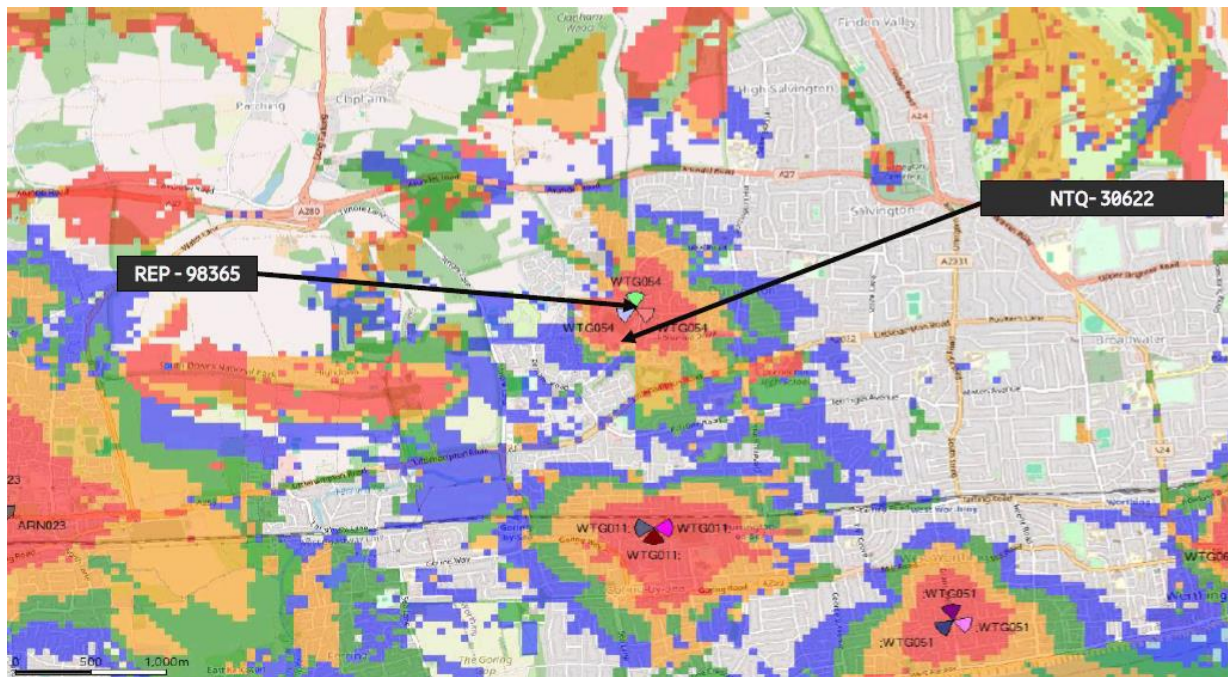
H3G 4G coverage including the application site

Extracts of the plots are also included to show outdoor 5G coverage levels in the area. There is no 5G coverage provided from the existing temporary installation. The first plot confirms this, showing a current lack of 5G coverage in the area:



H3G 5G coverage without an installation in the area

The final plot below confirms the introduction of the site would provide new 5G coverage to the area around the site, providing customers with the latest technology.



H3G 5G coverage including the application site

The overall position is that suitable replacement coverage would be provided from the application site, and new 5G coverage would also be provided. Capacity would also be improved, which is not illustrated by the plots.

Public Benefits

High-quality communications infrastructure is essential for sustainable economic growth, and high-speed broadband technology and other communications networks can also play a vital role in enhancing the provision of local community facilities and services.

The importance of mobile technology, more generally, in the UK, and its contribution to the sustainability agenda, is emphasised in a series of annual communication market reports published by OFCOM. The latest is the 2025 report ("Communications Market Report 2025") which sets out that telecoms revenues made a £34 billion contribution to the UK economy in 2024. "Retail fixed and mobile services generated £14.4bn and £14.1bn in revenue respectively, with wholesale fixed and mobile services making up the remaining £5.4bn. Mobile services accounted for 49.5% of total retail revenues in 2024, in line with 2023." It is noted that the demand for data continues to grow: "Average monthly data volumes per mobile data user (excluding machine-to-machine subscriptions) increased by 0.7 GB (7%) to 10.6 GB per month during the year."

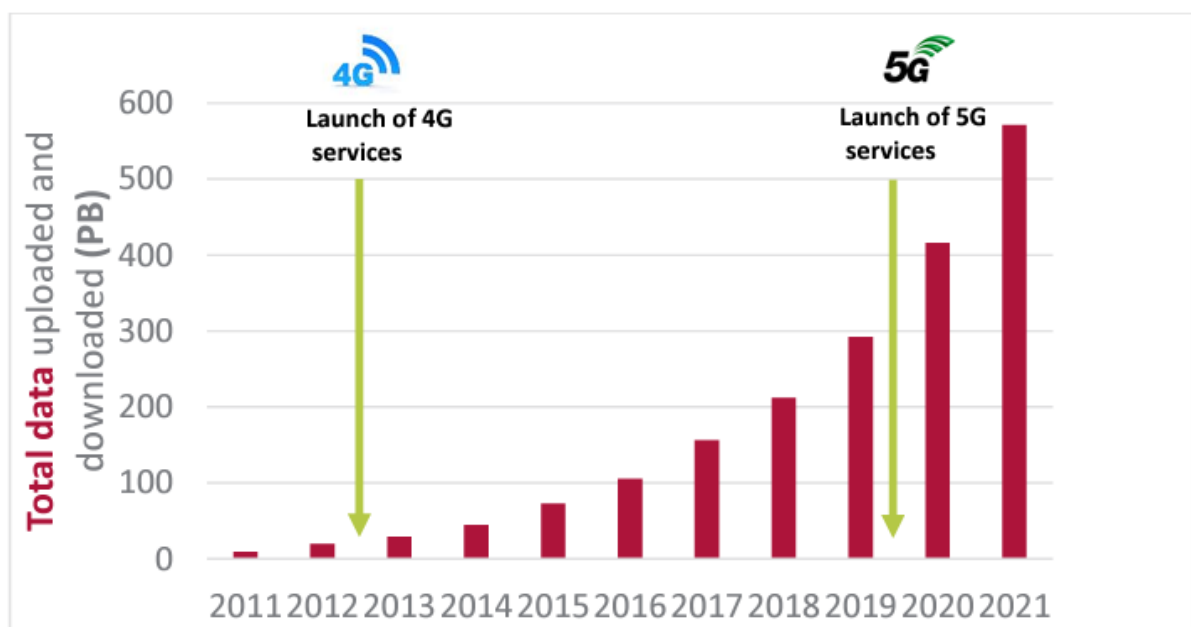
The UK Government recognises the benefits of the provision of high quality connectivity to commerce, industry and the public in general, and so places great emphasis on the benefits of mobile telecommunications to modern life and this is promoted throughout the planning system.

Paragraph 119 of the NPPF (2024) states that “*Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks including next generation mobile technology (such as 5G) ...*”. In the case of the application proposal, the base station would provide crucial replacement coverage and capacity for the site, which is due to be lost, maintaining the public services and benefits which this existing site have provided to this part of Worthing.

The NPPF takes account of the growth of the industry and technology, of the new social and economic demands for communications, and of the Government's environmental policies. This proposal, to enable EE and H3G to provide replacement network services and capacity to the surrounding area, will assist in achieving these objectives within this area.

The very high level of mobile phone use and ownership within the UK population is a very clear indication of the public's overwhelming acceptance of the benefits of mobile communications, which requires the upgrading and replacement of base stations to provide the necessary connection between the mobile phones and the UK telecommunications network.

A publication from OFCOM, in 2022, clearly illustrated the increasing demand for services. This is from a discussion paper entitled “Mobile networks and spectrum — Meeting future demand for mobile data”. To give a visual representation, this increasing demand for mobile data was illustrated in the report by the graph below:



Growth of monthly mobile data demand 2011-2021 (Source: Mobile networks and spectrum — Meeting future demand for mobile data, Ofcom 2022)

The Government recognises the importance of advanced communications infrastructure, such as the application proposal, as a key driver of economic growth. It considers digital connectivity as an essential service that should be readily accessible to everyone. The significance of mobile connectivity, particularly 5G, is further emphasised in several connectivity reports.

An example is a policy paper from the Department for Science, Innovation and Technology (published in April 2023). The paper is titled 'UK Wireless Infrastructure Strategy' and the introduction to the document (titled 'Our Plan') states:

“Connectivity has brought benefits for British households and British business, boosting growth, productivity, and opportunity for all. And change shows no sign of stopping. In fact, we find ourselves on the brink of a new revolution which promises to transform the world once more.

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.”

46. The Foreword to the document goes on to state:

“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 power of 5G and future telecoms advances will unlock new solutions in everything from industry to healthcare. Falling behind in coverage will mean falling behind in international competitiveness when it comes to the technologies of tomorrow, and failing to provide British people with innovative, life-enhancing services on secure, resilient networks.

The Wireless Infrastructure Strategy, developed through close engagement with industry and local bodies right across the country, sets out our plan for gripping this critical challenge and delivering our new ambition to provide nationwide coverage of standalone 5G to all populated areas by 2030.”

On a more local level West Sussex County Council have published a Digital Strategy. Within the introduction of the document it states: “For many of us, online banking, online shopping, the use of social media, apps and emails, and the streaming of videos – to give just some examples – have become such a part of our everyday experience that we cannot imagine life without them. We want to make sure that our residents’ experience of the Council fits with their everyday digital expectations.

In addition, EE (UK) Ltd will be supporting the communications requirements of Emergency Services Network (ESN) where further rollout and improvements in the 4G signal is currently being progressed:

“Investment in ESN will also mean improvements to 4G network coverage, which will allow 999 calls to be made from any 4G enabled mobile phone in some of the most remote and rural parts of Great Britain where it was not previously possible.

ESN will enable fast, safe and secure voice, video and data across the 4G network and give first responders immediate access to life-saving data, images and information in live situations and emergencies on the frontline.”

The application proposal looks to ensure continued 4G services for EE and H3G in the area, as well as providing new 5G coverage.

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)

Prior to selecting the proposed site, a comprehensive investigation was undertaken by the applicant's network planners, acquisition and planning agents to find a site capable of providing suitable replacement coverage, with a site that would cause the least harm to the visual amenities of the area. Potential sites are considered in terms of their technical suitability to provide the required level of services, the effect on visual amenity and their ability to be acquired, built and maintained.

The search area has been determined by the radio planner. A desktop study of the search area was undertaken, including the investigation of existing telecommunications structures. This was followed by a physical survey of the search area and potential sites. The on-site investigation was undertaken via the sequential process as detailed in the Code of practice for wireless network development in England. During the on-site investigation, the following are considered:

- Existing telecommunications sites and rooftop structures to place the proposed development, including other well-placed sites to meet technical requirements.
- The topography of the land as slopes have the potential to interfere with radio signals.
- Whether a site has enough physical space for the equipment required and if there is an efficient way of accessing it for maintenance.
- Health and safety considerations are made including ICNIRP and safe access.
- In addition to the above, planning considerations are made relating to each site, including the level of impact on visual amenity.

The siting of the proposed development has been carefully selected. The search area is very specific, and a location was identified which would ensure continued network provision, but which also would not encroach on the other cells sites within the Operators' network.

The application site is in an ideal location to provide replacement coverage and capacity to the surrounding area, being central within the search area and close to the temporary installation to be replaced. It will enable continued connectivity to be provided to the high number of mobile users in the surrounding commercial, residential and recreational areas.

	Site Type	Site name and address	NGR:	Reason for not choosing site
D1	RT	Columbia House, Romany Road, Durrington, Worthing, BN13 3RB	511220, 104599	A replacement site on Columbia House is the preferred option to provide coverage to the area and drawings have been produced for a proposed installation. From a planning point of view this site would be preferable because permitted development rights could be utilised, negating the need for an application for planning permission or prior approval. This option is still being progressed, however there is no guarantee that the site will be acquired or built, for example if a legal agreement cannot be achieved with the Site Provider. Therefore, whilst Columbia house is a superior planning option, the current application site is being progressed as a back-up option to Columbia House. It is confirmed that only one site is required. Should the Columbia House option be built, then this current streetworks option would not be built.
D2	ETS	Temporary installation, Adjacent to Columbia House, Romany Road, Durrington, Worthing, BN13 3HD	511151, 104500	This is a temporary development which was installed to provide coverage to the area when the original Columbia House installation was removed for the redevelopment of the building. This is a 28 metre high structure which is well screened from trees adjacent to the site. The current installation is not a suitable long-term solution as it is a temporary structure. A permanent solution was considered, however, a substantial structure would be required to ensure an antenna height is achieved to oversail local clutter, in terms of trees close to the site and buildings. An installation at least as high as the current structure would be needed and a permanent structure would be a substantial lattice tower with a large headframe at the top of the tower, having a far greater impact on visual amenity than the current temporary site, It is considered this would have a greater

				visual impact than the application proposal, which utilises a slim and unfussy design of monopole and would have a minimal impact on visual amenity.
D3	GF	Land at the junction of Faraday Close and Romany Road, Durrington, Worthing, BN13 3PJ	511088, 104398	A ground-based installation was considered in this location, and a prior approval application was submitted in February 2023 (application reference AWDM/0121/23). This application was refused due to the perceived impact on visual amenity on the surrounding area. Therefore, this option has been discounted.
D4	SW	Cignet Trading Estate SW, Faraday Close, Durrington, Worthing BN13 9PL	511079, 104485	A streetworks installation was considered in this location. However, there is insufficient space for the required equipment and to allow for pedestrians to safely pass the site. This option has therefore been discounted.
D5	SW	Durrington Lane SW, Grass verge between Durrington Land & E Tyne, Durrington, Worthing, BN13 2QJ	511930, 104434	A streetworks proposal was investigated in this location. There are services beneath the ground in this location, meaning that it is not possible to site the required equipment in this location.
D6	RT	Centenary House, Durrington Lane, Durrington, Worthing, BN13 2QB	511832, 104385	Use of this substantial building was investigated, however was not progressed due to uncertainty regarding the potential redevelopment of the building.
D7	SW	SW on the south side of Arundel Road, Durrington, Worthing, BN13 3LR	511406, 105809	A site was considered in this location as there is a high level of screening from trees adjacent to the site. However, the site is too far north of Columbia House to provide a suitable level of replacement coverage to the area. In addition, highways required a safety barrier to be installed as part of any development, and there is insufficient space for both a barrier and the required equipment.
D8	GF	Stedmans Garage, Arundel Road, Worthing,	511764, 105788	This commercial premises was considered, however the site is too far north of Columbia House to provide a

		BN13 3EH		suitable level of replacement coverage to the area. There is also insufficient space for an installation.
D9	RT/ GF	The Pines Day Centre, Faraday Close, Worthing, Durrington, BN13 3RB	511123, 104480	This building is currently vacant, therefore it is difficult to assess its availability until plans for the building are firmly in place. In any event, the building, with pitched roofs, is not suitable to accommodate the required equipment. In addition, there is insufficient space for a greenfield installation.
D10	RT/ GF	Durrington Community Centre, 2 Romany Road, Durrington, Worthing BN13 3FJ	511249, 104718	This building was investigated as it is located close to Columbia House and is, in theory, well sited to provide suitable replacement coverage to the area. However, the building is too low to achieve the required antenna height to provide the required level of coverage to the target area. In addition, there is insufficient space for a greenfield installation.
D11	SW	Northbrook Recreation Ground, Romany Road, Durrington, Worthing, BN13 3QS	510617, 104240	This is potentially suitable in planning terms with a good degree of screening from trees for an installation. However, the site is too far to the south-west and moving close to an existing installation. From this location it would not provide the required level off coverage to the target area.
D12	RT	Tesco Extra, Fulbeck Way, Durrington, Worthing, BN13 3FG	510981, 104791	The building was considered, however is unsuitable. Firstly, it is too low to achieve the necessary antenna height to provide the required level of coverage to the area. Second, the roof is covered by solar panels, and other rooftop equipment, leading to a lack of space for the required equipment.
D13	RT/ GF	Howdens, Faraday Close, Durrington, Worthing, BN13 3PL	511034, 104579	A rooftop installation at this location would not provide the required antenna height to provide the required level of coverage to the area. A site for a greenfield installation was investigated, however there is insufficient space with

				the parking and manoeuvring space required for the business use.
D14	RT	Eurotherm building, Faraday Close, Durrington, Worthing, BN13 3PL	511031, 104505	This building is too low to provide the required level of coverage to the target area. The car park has been ruled out as it is located within a flood zone 3 area, therefore is not suitable.
D15	RT	Laburnham and Larch Lodge, Walnut Tree Way, Worthing, BN13 3DN	511029, 104378	Despite having a potentially suitable rooftop to accommodate the required equipment, the buildings are too low to provide the required level of coverage to the area, and there is no rooftop access. As such, this site has been discounted.

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

N/A



Source: Gridreferencefinder.com

The map above is included to confirm the location of the sites that have been considered. For ease of reference a second map is included below to show the central sites considered in the area:



Source: Gridreferencefinder.com

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

Land use planning designations:



The map above is an extract of the Worthing Local Plan 2023 interactive policies map. The extract confirms there are no designations affecting permitted development rights on the site. The site is located within a District Centre (shaded turquoise) and land to the south-west is a Key Industrial Estate.

Impact of the development on adjacent Trees:

The site is located close to a number of small trees. These currently provide a backdrop to the lower section of the monopole and the equipment cabinets, and this mitigating impact will increase as the trees grow in future years. It is therefore important to ensure the proposed development does not harm these trees.

To ensure the development would not harm the trees a tree survey has been undertaken and a Tree Report prepared. This is attached with the application documents, along with a plan outlining tree protection measures that would be installed during the construction of the site. The Tree Report confirms that with care, and with the proposed tree protection measures, the development can be undertaken with minimal damage and disturbance to the trees.

Visual Impact and appearance:

The proposed development is required to provide replacement and enhanced connectivity to the area for the EE and H3G networks. The site would provide enhanced 4G coverage, along with new 5G coverage, to the surrounding area.

As noted in the LPA preapp response, where the difficulty of finding a suitable site location was appreciated, it has been difficult to find a site where the visual impact of the proposed development is kept to an acceptable level.

It is considered that the proposed location is the least visually intrusive and harmful site and design available to the applicant which also ensures suitable levels of coverage and capacity can be provided to the area. It is considered the development would not appear excessive. The selected siting is considered wholly appropriate. The proposal has been designed specifically to achieve a balance between meeting the technical requirement and avoiding harm to its setting, in terms of the impact on visual amenity.

Visual impact

To allow for a better assessment of the proposal in terms of its impact on the visual amenity on the surrounding area, photomontages have been produced to give an impression of how the equipment would appear in the street scene if constructed.

Three public viewpoints were chosen to illustrate the impact of the proposed development on the surrounding area. An existing view, and a proposed view with the proposed equipment, are included (shown in full in the photomontage document included with the application). These viewpoints are shown below (with the location of the proposed site also shown):



Photomontage locations

The proposed viewpoints from the photomontages are copied below for ease of reference and discussed thereafter.

Photomontage viewpoint 1



The first viewpoint is taken from the pavement on the eastern side of New Road (to the north-east of the roundabout) looking south-west towards the site, at a distance of approximately 110 metres. This is a viewpoint where pedestrians would view the site, as would people travelling in vehicles, with the roundabout being a busy road junction. There would also be some oblique views from residential properties in the area. From this viewpoint the upper section of the proposed monopole and the antennas would be visible. There would be a significant level of mitigation from the belt of trees to the rear of the site. There is also a significant level of street furniture from this viewpoint, including lighting columns, signage, traffic lights, railings and a bus shelter, which assists in mitigating the level of impact. The street lighting columns act as existing vertical elements and, despite the pole being taller, would allow the pole to assimilate into its surroundings. Although visible, it is considered that the visual impact of the proposed development from this viewpoint would be acceptable.

Photomontage viewpoint 2



This view is from the pavement on the eastern side of Romany Road, looking north-west towards the site, at a distance of 66 metres. Again, this is a busy area for both pedestrians and those travelling in vehicles. A relatively close view is needed in this instance, as moving further south, results in the pole being screened by the belt of substantial trees between the Tesco site and the industrial buildings.

As with the previous view, the equipment would be visible, with the top of the pole and antennas, coloured grey and set against, in this instance, a grey sky. The lower section of the pole is visible through the branches of the intervening tree. It is noted that photographs for the montages were taken during the winter, and the mitigating effects of the trees would be greatly increased in the summer months.

From this view, apart from the mitigating impact of the trees, there are significant levels of street furniture, including lighting columns, signage and a bus stops close to the site. Although the monopole would be visible it would have a backdrop of trees, with only the top of the antennas protruding above the trees. Again, from this view the visual impact of the monopole would be mitigated to an acceptable level.

Photomontage viewpoint 3



The final view is taken from Shelby Road, looking north-west towards the site at a distance of 74 metres. This view was chosen as it provides a view from close to residential properties on the eastern side of Romany Road.

From this location the pole would be visible, however its light grey colour set against the sky limits its impact. There are some trees that would provide a level of screening to the lower section on the pole, and there are also lighting columns which provide existing vertical elements from this view. Further to this, the site is on the western, commercial side of Romany Road. The Tesco car park and store would provide a backdrop from this location.

Whilst visible from residential properties it is noted that there would be no direct views of the equipment from properties close to the site, properties being at an angle to the equipment. This ensures there would not be an unacceptable level of impact from properties close to the site.

Overall, the photomontages confirm that the proposed equipment would, as expected, not be entirely camouflaged or screened, and have a level of visibility, dependent on viewpoint and proximity. However, they also confirm that the specific siting of the equipment close to substantial levels of street furniture and in an area where there are trees, both close to the site and in the wider surrounding area, assists in ensuring the impact is kept to an acceptable level. The proposal is considered a suitable location to provide continued coverage to the area, particularly taking into account the absence of less harmful alternative sites that can also meet the coverage objective.

The photomontages are only able to pick out limited viewpoints, and it is noted there would be views of the monopole from other locations. However, in general the mitigating impacts already mentioned would ensure the level of impact is kept to an acceptable level. Both short and longer-range views would have the visual impact mitigated to an acceptable level by the mitigating effects of the trees, acting either as a screen or a backdrop, both close to the site and in the wider surrounding area, along with the context provided by the lampposts and other items of street furniture. It is noted that visibility does not necessarily equate to harm, however, the elements noted ensure there would only be a minimal impact on visual amenity.

On balance this proposed location is considered to be the optimum location in terms of siting and design, with the extremely limited harm it may impose on the surrounding area being outweighed by the provision of enhanced services to the area in the public interest. As such, equilibrium will be achieved between technical requirements and environmental impact.

PLANNING POLICY

National Planning Policy Guidance

National Planning Policy Framework (2024) (NPPF)

The National Planning Policy Framework came into force in 2012. The guidance has most recently been revised in December 2024. The NPPF sets out the Government's planning policies for England and how these should be applied.

Paragraph 7 of the NPPF states "*The purpose of the planning system is to contribute to the achievement of sustainable development*", and in paragraph 10 that "*at the heart of the Framework is a presumption in favour of sustainable development*". In order to achieve the sustainable development objective, the NPPF has identified 3 overarching objectives (paragraph 8):

"a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."

For **decision-taking** (paragraph 11) this means:

*“c) approving development proposals that accord with an up-to-date development plan without delay; or
d) 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:
i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.”*

Further to this, paragraph 39 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 brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area.”*

The proposed development will enable the provision of continued mobile communications for the Emergency Services to the surrounding area.

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

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

Leading on from this, paragraph 119 states that *“Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections”*.

While supported, the number of base stations are encouraged to be kept to a minimum in which the efficient operation of the network can be provided. Paragraph 120 states that *“The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged”*.

This installation is required to allow for continued services to the area for the EE and H3G’s networks, therefore mast sharing is proposed. Therefore, the proposal is considered to be in line with the above policy.

It should be noted that paragraph 123 states that *“Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between*

different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure”.

The proposal outlined within this document and the supporting enclosures, is in complete accordance with the guidance as set out in the National Planning Policy Framework.

Development Plan Policy

Section 70 of the Town and Country Planning Act 1990 as amended requires planning applications and appeals to be determined having regard to the provisions of the Development Plan and other material considerations, and section 38 of the Planning and Compulsory Purchase Act 2004 requires applications and appeals to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

For the purposes of Section 70, the current adopted development plan for Adur & Worthing Councils, relevant to the proposal, comprises The Worthing Local Plan 2023.

Most relevant to the proposal is policy DM14, dealing with Digital Infrastructure. The relevant section of the policy is copied below for ease of reference:

“DM14 – Digital Infrastructure

The Council supports the expansion and improvement of digital infrastructure. Applicants will be required to meet the following requirements.

New Telecommunications Infrastructure

c) Relevant proposals should demonstrate that:

- i) the installation is the minimum required for the efficient operation of the network;*
- ii) all opportunities to make the most efficient use of existing telecommunication site have been explored fully such as: mast sharing, use of existing buildings or structures;*
- iii) no other suitable sites are available.*

d) All relevant applications for planning permission shall submit;

- i) evidence that the proposal is the least environmentally harmful option;*
- ii) a statement that self-certifies that the cumulative exposure will not exceed the guidelines of the International Commission on Non-Ionising Radiation Protection (ICNIRP).*

e) The location and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area/host building.

f) Conditions or planning obligations may be used to secure landscaping as well as restoration of the site if operation ceases.”

The proposal is considered to comply with the above policy for the following reasons:

- A structure of a minimum height is proposed. Rather than each operator propose their own development, a shared structure is proposed to keep the overall impact of telecommunications development in the area to a minimum. As previously explained, the stacked formation of antennas allows a slim structure to be utilised, however this needs to be at a height sufficient for the lowest set of antennas to operate effectively.
- Following a sequential site search for alternative locations, the application site is considered to be the least harmful that were available, would provide the required level of coverage to the target area and that are buildable. Although a new freestanding site is proposed, this would be a shared structure for both the EE and H3G networks.
- The application site is in a relatively open site, and would be visible in the area, however visibility does not necessarily equate to harm. A slim and unfussy design of monopole is proposed, where there are existing street furniture and trees, both close to the site and in the wider surrounding area, to provide a degree of screening, or a backdrop, dependent on viewpoint.
- A certificate is included with the application to confirm compliance with ICNIRP guidelines.

In support of the policy, the supporting text at paragraph 5.199 states: *“High quality digital infrastructure is crucial to successful business locations and also plays a vital role in enhancing the provision of local community facilities and services. Well connected places attract modern businesses and can create the conditions for new clusters of digital and creative businesses to emerge. Access to high quality digital infrastructure can also facilitate social inclusion, enabling everyone (providing they have the necessary skills and equipment) to take up employment, education and social opportunities, as well as access a wide range of services that are increasingly provided online.”* The proposed development would assist in achieving this aim for customers in the area around the site.

No conflict has been identified with any other Development Plan policies.

Overall, it is considered the proposal complies with both national and local policy. In terms of national policy, it minimises the number of installations by sharing and would provide coverage for a wide range of technologies. It is of significance that the development ensures a continued and enhanced provision of local community facilities and services.

Summary

National planning policy is to facilitate the growth of new and existing telecommunications systems, and operators have obligations to meet customer demands for a continued and improved quality of service.

The specific requirement of the operators in this instance is to provide replacement connectivity and network enhancement to the area, with a minimal impact. This site achieves this aim. The proposed development is compliant with the NPPF. This siting and design is considered the most appropriate solution to providing the coverage requirements to the area.

The proposal is fully compliant with ICNIRP guidelines.

Name: (Agent)	<u>Chris Andrews</u>	Telephone:	<u>01932 411011</u>
Operator:	<u>EE (UK) Ltd and H3G (UK) Ltd</u>		
Address:	<u></u>	Email Address:	<u>chris.andrews@mgrouppltd.com</u>
		Date:	<u>22/12/2025</u>
Signed:	<u>Chris Andrews</u>	Company:	<u>M Group Ltd</u>
Position:	<u>Town Planner</u>		
		(on behalf of MBNL (EE Ltd and H3G UK Ltd) and above operator)	<u></u>