

**5G SITE SPECIFIC SUPPLEMENTARY INFORMATION AND PLANNING JUSTIFICATION
STATEMENT PREPARED BY DOT SURVEYING**

1. Site Details

Site Name:	20 Dale Street	Site Address:	20 Dale Street, Greater Manchester, Manchester, M1 1EZ
NGR:	E: 384525 N: 398360		
Site Ref Number:	MAN041	Site Type:	Existing rooftop upgrade.

2. Pre-Application Check List

Site Selection

Was the Council's mast register used to check for suitable sites by the operator or the LPA?		No
If no explain why:		
It was felt that the industry database was a more up to date source of information.		
Was the industry site database checked for suitable sites by the operator:	Yes	
If no explain why:		
N/A		

Pre-application consultation with the Local Planning Authority

Written offer of pre-application consultation:	N/A
Was there pre-application contact:	Yes
Date of pre-application contact:	16 th February 2022
Name of contact: planning@manchester.gov.uk	Email issue to the Local Planning Department.
Summary of outcome/Main issues raised:	
Everything Everywhere (EE) is committed to providing improved network coverage and capacity, most notably in relation to 5G services. In these unprecedented times of the Covid-19 pandemic, it is recognised that high-speed mobile connectivity is the lifeblood of a community; facilitating educational benefits, providing access to vital services, improving communications with the associated commercial benefits for local businesses, enabling e-commerce and facilitating the increased need and demand for working from home, as well as enjoying access to social, media and gaming for leisure time activities.	

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Green
Prior to the submission of this application, pre-consultation was initiated with the local planning authority, providing an opportunity to discuss development proposals and identify site specific issues.	
Summary of outcome/Main issues raised: Determination as to whether the prior approval of the authority will be required to the siting and appearance of the proposed installation is invited under Part 16, Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended, as well as the objectives of the National Planning Policy Framework (February 2019). It is our opinion that the proposed design presents a better 'fit' within the local community and immediate street scape, offering a reduced visual impact. It is considered that the design and siting, accords with Local Authority's critical role in delivering the UK Government's Digital connectivity vision and provides a basis for the local planning authority to support the request for plans to speed up digital infrastructure rollout set out by Ministers on the 27 th August 2020.	

School/College

Location of site in relation to school/college: No schools have been identified within 400m of our proposed site.
Outline of consultation carried out with school/college: N/A
Summary of outcome/Main issues raised: To the best of our knowledge no response has been 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?		No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified? N/A		No
Details of response: N/A		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	2 nd March 2022	

3. Proposed Development

The proposed site: Everything Everywhere (EE) are in the process of supporting the UK Government's Digital connectivity objective and providing a critical role in building the UK's fastest mobile network to provide improved coverage and capacity, most notably in relation to 5G services. The technical details of this proposal are illustrated within application design drawings as attached. The very nature of installing telecommunications infrastructure within such an urban setting requires a highly considered balance between the need to extend practical coverage reach with that of increasing risk of visual amenity intrusion. In this location, existing mast sites are not capable of supporting additional equipment compliment to extend coverage reach across the target area and prospective 'in-fill' mast sites are extremely limited. There is an acute need for upgraded base stations to provide effective service coverage and in this case, the proposed upgrade will bring the benefits of 5G to this area.
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Figure 1 - Site Photograph



Proposed location of upgraded telecoms infrastructure shown above will assimilate well into the immediate street scene and not be detrimental to the character of the local area.

The proposed site option is considered the best available compromise between extending 5G service across the target 'coverage hole' with the selected street works upgrade; such upgrades to existing installations are deemed Permitted Development without Prior Approval and therefore do not form part of the proposal from a planning consideration perspective as set out in the undernoted planning analysis:

Planning Policy Relevant to the Development Site:

Development Plan Policy: National Planning Policy Framework (February 2019)

The relevant Local Plan against which the application will be determined, is the Manchester Local Development Frameworks Core Strategy Development Plan Document.

The National Planning Policy Framework (NPPF) section of this Supporting Statement goes into detailed analysis of why this site is in compliance with the NPPF.

Policy Analysis:

Government attaches great importance to the design of the built environment and outlines this within Section 12 (para. 124) of the National Planning Policy Framework. It states:

“Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”

In keeping with the National Planning Policy Framework (NPPF) guidelines of using: “high quality communications” (Section 10), the proposed design has been selected to minimise visual impact upon the streetscape by integrating with the existing built environment.

The design of the proposed antenna and ancillary cabinets is considered to be the least visually intrusive option available. Whilst it is accepted that there will be a localised visual increase through the installation of additional apparatus, it is considered that this will not overly detract from the character of the existing streetscape.

Type of Structure	
Description: A description of the works is included in the drawings.	
Overall Height:	See drawings
Height of existing building	N/A
Equipment Housing:	
Length:	See drawings
Width:	See drawings
Height:	See drawings
Materials	
Tower/mast etc. - type of material and external colour:	See drawings
Equipment housing - type of material and external colour:	See drawings

Reasons for choice of design:
The proposed installation will support the UK Government Digital connectivity vision and provide a basis for support from the local planning authority to speed up digital infrastructure rollout set by Ministers on 27 August 2020. Such development will facilitate educational benefits, providing access to vital services, improving communications with the associated commercial benefits for local businesses, enabling e-commerce and working from home as well as enjoying access to social, media and gaming for leisure time activities. In accordance with the requirement set within National Planning Policy Framework (February 2019) guidelines; the proposed 'Street Works' design has been selected to minimise visual impact upon the street scene by integrating with existing street furniture.

4. Technical Information

ICNIRP Declaration attached ICNIRP (International Commission on Non-Ionizing Radiation Protection) aims to protect people and the environment against adverse effects of non-ionizing radiation (NIR). 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	Yes	
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determining compliance, the emissions from all mobile phone network operators on the site are taken into account.		
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5. Technical Justification

Reason(s) why site required
The National Planning Policy Framework (NPPF) clearly states that authorities should NOT question the need for the service, nor seek to prevent competition between operators. Notwithstanding this, the Applicant considers it to be important to explain the positive technical justification for the site and how the facility fits into the overall network. The site is required to provide new 5G coverage for Everything Everywhere (EE), improving service in and around this area subject to this application. The cell search areas for 5G are extremely constrained with a typical cell radius of approximately 50m.

6. Site Selection Process – alternative sites considered and not chosen

Discounted Options
In accordance with the sequential approach outlined in the NPPF, the following search criteria have been adopted. Firstly, consideration is always given to sharing any existing telecommunication structures in the immediate area, secondly; consideration is then given to utilising any suitable existing structures or buildings and thirdly, sites for freestanding ground-based installations are investigated. This sequential approach is outlined below: a) Mast and Site Sharing b) Existing Buildings Structures c) Ground Bases Installations In compliance with its licence and the sequential approach outlined in the NPPF, all attempts to utilise any existing telecommunication structures where they represent the optimum environmental solution have been employed. The Mast Data register is always examined prior to the submission of a planning application.

Discounted Options and National Planning Policy:

The National Planning Policy Framework (NPPF) is clear that LPAs should not question the need for the installation under Part 116: <i>“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”.</i> Typical to most 5G cell site deployment within the urban environment, this is an extremely constrained cell search area. It is recognised that the very nature of upgrading existing mast
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infrastructure within a dense urban setting requires a well-considered balance between the need to extend practical coverage with that of increasing risk of visual intrusion

Discounted Options:

As this is an existing installation we have not searched for other locations as yet on the assumption that we will be able to implement this proposed upgraded scheme to give the local population coverage and capacity to use their telecoms devices. Ultimately consideration was given to utilising the existing telecoms location as per the government guidance.

7. Additional Relevant Information

Background to the Proposal

Everything Everywhere (EE) supports Government ambition to be a global leader in the next generation of mobile technology set out within its March 2017 white paper, 'Next Generation Mobile Technologies: A 5G strategy for the UK' and expand its mobile network across the local planning authority area and specifically in this instance, to enhance 5G coverage levels in and around the site subject to this application.

DEVELOPMENT PLAN POLICY:

Development plan considerations have a special significance in law. Section 54A of the Town and Country Planning Act 1990 (The Act), and re-iterated in Section 38 of the Planning and Compensation Act 2004, stated that:

"Where in making any determination under the Planning Acts regard is to be had to the Development Plan, determination shall be made in accordance with the Development Plan unless material considerations indicate otherwise."

NATIONAL PLANNING 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 July 2018) sets out the Government's planning policies for England and how these are expected to be applied at the 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 give rise to the need for the planning systems to perform a number of roles including;

- Economic Role - contributing to building 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 NPPF contains at its core a presumption in favour of sustainable development which runs through both plan-making and decision-making processes. The NPPF recognises the vital importance of high-quality telecommunications and dedicates a whole chapter to this area. Chapter 10 of the NPPF outlines the Governments support for high quality communications.

The paragraph extracts highlighted below, clearly outline the overarching support from Central Government for telecommunications and how Local Planning Authorities should embrace this vital infrastructure:

Paragraph 112 states:

“Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high-quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).”

It continues in Paragraph 113

“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. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate.”

Operators always follow the sequential site selection process. 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 scope to upgrade an existing telecoms site.

The support for telecoms and the need not to constrain Operators is laid out in Paragraph 116

“Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.”

In addition to the above, we would also draw to your attention a recent Appeal Decision which followed on the back of a refused planning application within Walworth, London, SE17 3DU. The application (ref: 20/AP/1187) was refused on the following grounds: - 1) The 20m monopole does not comply with part (a) of Part A.1 of 16 of the GPDO 2015 and 2) The proposed cabinets and monopole would introduce excessive clutter on the footway, disrupting pedestrians. The appeal was brought by Hutchison 3G (UK) Ltd against the Council of the London Borough of Southwark. The appeal was allowed on the 10th November 2020 (Appeal Reference: APP/A5840/W/20/3254830).

Conclusion

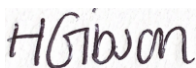
Government considers that high-speed mobile connectivity is the lifeblood of a community. Everything Everywhere (EE) is committed to providing improved network coverage and capacity, most notably in relation to 5G services.

Taking into account the site-specific factors and technical constraints, available options and planning constraints, it is considered that the proposed upgrade clearly represents the optimum environmental solution to extend coverage to the target Community. Where the underlying aim is to provide an efficient and competitive telecommunication system for the benefit of the community, while minimising visual impact.

In accordance with a recognised need to expand and promote telecommunications networks across the region, it is considered that the proposal fully accords with the National Planning Policy Framework.

On this basis, favourable determination as to whether the prior approval of the authority will be required to the siting and appearance of the proposed installation is invited under Part 16, Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015.

Contact Details

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Signed:		Date:	2 nd March 2022
Position:	Planner	Company:	Dot Surveying Ltd
		(On behalf of above operator)	