

SUPPLEMENTARY INFORMATION FORM

1. Site Details

Site Name:	Princess Road	Site Address:	Land on the western side of Princess Road (south-west of its junction with Bowes Street), Moss Side, Manchester, M14 4RB
National Grid Reference:	383810, 395038		
Site Ref Number:	MAN13709	Site Type: ¹	Macro

2. Pre-Application Check List

Site Selection (for New Sites only)

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 mast register available. A physical search of the area was carried out.		
Was the industry site database 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:	No
Date of pre-application contact:	N/A
Name of contact:	N/A
Summary of outcome/Main issues raised: Pre-application correspondence including a covering letter and drawings was forwarded to the Manchester City Council planning department and the highways department by email on 27 April 2022. No comments have been received to date.	

¹ Macro or Micro

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline of consultation carried out: Pre-application correspondence was forwarded by email on 27 April 2022 to the Whalley Range Ward Councillors – Cllrs Razaq, Stogia and Bano.			
Summary of outcome/main issues raised (include copies of relevant correspondence): No comments have been received to date.			

School/College

Location of site in relation to school/college (include name of school/college): There are no schools close to the site. The closest is St Bede's College on Alexandra Road South, which is approximately 460 metres from the site.
Outline of consultation carried out with school/college (include evidence of consultation): Due to the distance involved no consultation has been undertaken.
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: N/A		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	10 May 2022	

3. Proposed Development

The proposed site:

This application seeks consent with regard to the siting and appearance of:

The installation of a 20-metre-high monopole supporting 6 no. antennas, 4 no. equipment cabinets at ground level and development works ancillary thereto.

There a requirement to provide improved network coverage and capacity in this location which cannot be met by existing masts and antennas.

The proposed development is required to provide new infill coverage for the H3G network (known as '3'). The site is primarily required to provide new 5G coverage and capacity to the area surrounding the site. It would also improve 4G coverage and capacity.

The site is located on the western side of Princess Road, south-west of its junction with Bowes Street. The area around the site is predominantly residential in character, however there are no properties immediately adjacent to the site. The site benefits from being close to substantial trees, which would assist in mitigating impact to an acceptable level. The site is not subject to any planning constraints or designations affecting permitted development rights.

This is the second proposal for an installation to provide coverage to the surrounding area. A similar proposal on Bowes Street (to the east of the current application site) was granted consent for a monopole and cabinets in January 2021 (application reference 128708/TEL/2020). Unfortunately, it has not been possible to implement this consent due to underground services in the pavement, hence this alternative site location.

The proposed location is shown below:



Proposed site location

Type of Structure (<i>e.g. tower, mast, etc</i>):		Streetworks Monopole
Description: The installation of a 20-metre-high monopole supporting 6 no. antennas, 4 no. equipment cabinets at ground level and development works ancillary thereto.		
Overall Height:		20 metres
Height of existing building (<i>where applicable</i>):		N/A
Equipment Housings:		
Commscope Bowler Cabinet:		1.9m (width) x 0.6m (depth) x 1.752m (height)
Ericsson 6130 Cabinet:		0.65m x 0.7m x 0.95m
Commscope AC Transmission Cabinet:		0.6m x 0.5m x 1.585m
Wrap around cabinet:		2.0m x 0.7m x 1.54m
Materials (<i>as applicable</i>):		
Tower/mast etc – type of material and external colour:		Steel with a fir green finish (RAL6009).
Equipment housing – type of material and external colour:		Steel with a fir green finish (RAL6009).

Reasons for choice of design, making reference to pre-application response:
This application proposal is made in accordance with the Code of Practice for Wireless Network Development in England (2022) and has taken a sequential approach to the development of telecommunications equipment. First, ensuring that there are no appropriate opportunities for mast or site sharing, and that there is not an existing rooftop or structure that is available, suitable and viable to host telecoms equipment. This assessment has been undertaken through a physical search of the area. As a result of this search, it was concluded that there are no existing sites, rooftops or structures which would be suitable or available for new telecommunications equipment and therefore a new streetworks installation has been proposed to meet the demand in this area. The site location has been selected using a relatively small and targeted search area which determined that this location would be the most appropriate location for a streetworks installation from both a technical perspective and taking into account the relevant planning considerations. The proposed installation has sought to achieve a balance between the technical requirements of the operator and, as far as is practicable, planning and environmental considerations when considering its siting and design. With regards to appearance, the design of telecommunications masts, particularly 5G masts, are heavily influenced by technical constraints and are significantly limited in terms of the options available to camouflage or design the masts and their associated equipment to fit in with surrounding development. The design and type of equipment to be deployed in this case is a streetworks installation which has been chosen specifically to take account of, and minimise, the impact of the installation on the streetscene where possible. This involves a relatively slimline monopole with tightly stacked antennas, ancillary equipment contained within smaller highways cabinets at ground level and no fencing, means of enclosure or large area of hardstanding around the site. This design has been selected over other available options which use bulkier and wider masts or lattice towers, with open headframes, level

antennas, larger cabinets or cabins, visible lengths of cable and trays, high chainlink or palisade fencing and larger area of hardstanding. The installation is also free of transmission dishes which can add additional bulk to the structure.

With regard to height, following technical assessment by a qualified radio planner and telecommunications designer, a mast of 20 metres is has been proposed.

It is acknowledged that this newly proposed installation would still be taller than the existing street furniture and trees in the area. Whilst it would be preferable to propose the mast at a lower height, more in keeping with the heights of the surrounding infrastructure, it is unfortunate that the technical requirements of the mast mean that this is not possible. This is because 5G signal does not propagate (travel) as well as lower frequencies and is prone to 'clipping'. This means it does not pass well through different materials and needs a clear space free of obstructions (such as trees and buildings) to deliver signal. Therefore, there is a need to ensure that the antennas are able to rise above any obstructions such as trees and taller buildings. As 5G is much more susceptible to 'clipping' and cannot travel as far as lower frequencies, a series of new installations, such as this, which are taller in height are being proposed across the country to accommodate the delivery of 5G coverage.

With regards to the number and size of the cabinets required to support the mast and antennas and deliver the required levels of signal, from a technical standpoint the cabinets cannot be any smaller and are proposed as the least detrimental solution to be located within a highway's location.

The finish of the monopole and the equipment cabinets is proposed to be dark green, to benefit from the siting of the site close to mature trees. The applicant would however be open to amending the proposed colour if considered necessary or appropriate by the Council.

In summary, a location has been proposed within the required search area which is considered to balance the technical requirements of the operator against provide the least detrimental solution with regards to siting and appearance. The height of the mast has been selected at the lowest possible height of 20 metres. The mast is of a high quality streetworks design and the associated cabinets and equipment have been designed to use the smallest possible components and to keep equipment to a minimum.

Technical Information

	Yes	No
International Commission on Non-Ionizing Radiation Protection Declaration attached (see below). International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to 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, Hutchison 3G UK Ltd 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 Hutchison 3G UK Ltd's network, the radio base station that is the subject of this application will be configured to operate in this way. All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference. The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.		

4. Technical Justification

Enclose predictive coverage plots if appropriate, e.g. to show coverage improvement. Proposals to improve capacity will not generally require coverage plots.

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

Reasons why a new mast is required:

There is a requirement to upgrade the H3G network in the area to provide improved coverage and capacity, most notably in relation to 5G services, but also in relation to 4G services. The proposed development is required to provide new infill coverage for the H3G network (known as '3').

The proposed mast seeks to provide new signal to areas where signal is limited and improve capacity where existing pathways are overloaded. The site is proposed to deliver improved coverage to the area to ensure that it benefits from adequate coverage levels as well as new 5G coverage. 5G coverage is currently being rolled out by all operators across the country and is supported and encouraged at government level.

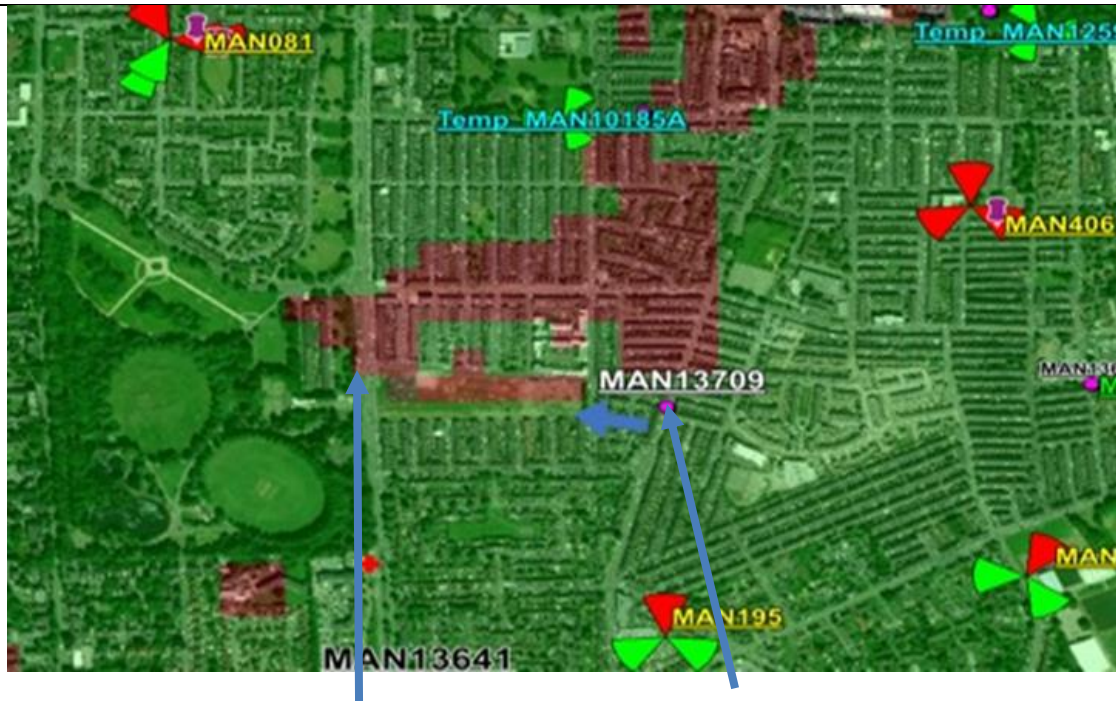
As with all telecommunication infill development this is an extremely constrained cell search area. Options are extremely limited and the solution that most efficiently minimises amenity issues has been put forward. The map below shows the existing 4G coverage pattern for the locality. The cell nominal (the optional location for an installation in technical terms) is shown, along with the application site location.

Sufficient coverage levels are shown as green on the map. Areas that are shaded red show coverage gaps where insufficient coverage and capacity is currently available for Three. The 'propellers' show existing installations in the surrounding area. As you can see from the coverage map below there is a large coverage gap in the area.

Properties, premises and people passing through this area will currently not be able to access sufficient 4G signal as a result of this coverage gap.

The search area is constrained by the existing installations shown on the map. Being too close to these installations can cause interference and therefore it is paramount that sufficient separation distance is retained.

Also, to note is the existing sites are shown as red pointing towards the site location. This indicates that these sectors are working at a high level of capacity. With the ever-increasing demand, this also confirms the need for additional capacity in the area.



Application site

Centre of search area

The cell nominal is located within a dense residential area with extremely limited siting opportunities. This location is not considered the most suitable location for an installation in planning terms due to the entirely residential nature of the area. As such, the search area was slightly widened and a site was found to the west, of the search area which is better able to balance planning and technical considerations and is the subject of this application. This location has been reviewed by network radio planners who have determined that this site would still be able to provide sufficient improvement to make it viable in technical terms.

Why is 5G coverage required?

With regard to the history of mobile telecommunications development, the first generation of services provided voice calls, the second generation (2G) allowed basic data such as texting and the third generation (3G) offered internet access and the development of apps. Since then, the smart phone has developed further and the fourth generation has brought video and much faster data speeds allowing the integration of the smart phone into wider use.

The next generation of mobile telephony is 5G which brings greatly increasing data speeds. The advantages this presents range from near-instant downloads of HD films to connected cars, smart medical devices and smart cities.

Although 5G will undoubtedly bring new opportunities and huge benefits to society, we cannot escape from the requirement that new structures, antennas and ancillary equipment will be needed to deliver it.

To bring this new technology into use H3G will need to provide a mix of upgrades to existing sites in addition to the building of new sites. New sites are needed for many reasons, including that the higher radio frequencies used for 5G do not travel as far as those frequencies currently in use, which can leave gaps in the network. The implications to the built environment will be that more infrastructure needs to be deployed, as in this case.

It has been acknowledged by Government that we must ensure that we have the infrastructure in place to deliver 5G across our major centres and transport networks. Matt Warman MP (Minister for Digital Infrastructure) and the Rt Hon Christopher Pincher MP (Minister for Housing State) state within the 'Changes to permitted development rights for electronic communications infrastructure: technical consultation' published in April 2021, that:

"Digital connectivity is – now, more than ever – vital to enable people to stay connected and businesses to grow. The demand for mobile data in the United Kingdom is increasing rapidly, and the COVID-19 pandemic has highlighted how important it is that we all have access to reliable, high quality mobile connectivity. We intend to be a global leader in 5G, the next generation of wireless connectivity, and for communities and businesses to benefit from investments in this new technology. The case for 5G is compelling: it will provide faster, more responsive and more reliable connections than ever before. Through our £200 million 5G Testbeds and Trials programme we are already seeing its value to manufacturing, farming, transport networks and healthcare.....It is welcome that all four Mobile Network Operators have started to deploy 5G networks, meaning 5G is now available in over 200 towns and cities across the United Kingdom.....We must, however, continue to ensure people have access to fast, reliable digital connectivity and mobile coverage. The planning system plays a key role in delivering the infrastructure that we need as households and businesses become increasingly reliant on mobile connectivity"

This is one of the many additional structures that will be needed to provide enhanced services and new 5G coverage to the UK.

Differences between 4G and 5G

In their recent #checkthefacts campaign, Mobile UK highlight the biggest differences between 4G and 5G. These are broadly summarised as:

- Quicker speeds
- Improved latency - Time taken for information to travel from sender to receiver
- Improved capacity - more devices can be connected at one time
- 5G Networks can be sliced – allowing dedicated and reliable networks for local services (such as the emergency services) and individual businesses.

The new installation will bring next generation technology. The full extent of benefits of 5G technology is still unknown and will, to a significant degree, depend on the ability to provide a comprehensive network coverage. However, the possibilities and potential of the technology seem endless. If allowed, residents and visitors will benefit from:

Much faster download/upload speed and latency. Delays between information sent and received will become virtually impossible to perceive. Real-time content sharing and data will become a reality. This will effectively make buffering and loading delays a thing of the past, with data only taking 1 millisecond to be received by a device after it has been requested – it currently it takes up to 60 milliseconds.

Multiple Devices can be connected. Countless devices will be able to access mobile online services at the same time. It will mean you can always stay connected. For example, if you are at a football stadium or a crowded festival with everyone trying to simultaneously upload and share their experiences to social media without loss of connection.

Improved home working. 5G rivals the speed of fibre broadband and can provide much needed connections where internet connections are still poor and in need of updating. Everyone will have access to fast and uninterrupted sharing, streaming, and browsing via their mobile phone network. It will mean accessible near gigabit capable speeds when you are out and about and could, in the future, work alongside or provide an alternative to fibre and wires in the home.

5G supports the development of the “Internet of Things”. This encompasses all the ‘smart’ and connected devices we’re starting to see in homes and beyond, from smart light bulbs and thermostats, to connected kettles, security cameras and more, most of which can be controlled by an app on a mobile phone, or by voice when paired with an AI Assistant such as Amazon Alexa. In some cases, they can even be automated, with lights for example turning on when entering a room and turning off when leaving it. They do this in part by communicating with each other, for example, motion sensors at a room entrance could adjust lighting when people enter or leave a room.

Smart Cities. It also supports the development of “Smart Cities” which develops the “Internet of Things” beyond homes and out into the world to make cities smarter. Examples include traffic lights that can adapt automatically based on traffic flow, automatic deployment of road repair vehicles when potholes are detected, smart power distribution (e.g. so that buildings are not being lit when they are empty) and rubbish bins automatically reporting when they require emptying, all leading to cleaner, safer, more efficient cities, and all with minimal human oversight.

Cars of the future. When connected to 5G, the cars would communicate and share data with other vehicles and connected infrastructure, avoiding accidents and traffic as a result, and telling smart cities where traffic is building up, so routes for other vehicles can be adjusted. This will also play a large role in self-driving cars, with its speed and reliability key to them rapidly sending and receiving information about the road and other vehicles.

The Environment. 5G connected devices will allow us to reduce our energy use and emissions, so we have a less negative impact on the environment. Multiple devices will connect to each other, so they know when they’re in use and powerup or down accordingly. 5G will allow us to download data in a more efficient way, so we use less energy. Smart energy meters will help us reduce household energy use, and smart transport systems will help us produce fewer emissions when we travel.

More information on 5G and its benefits can be found at <https://www.mobileuk.org/5g-benefits>.

Mobile UK also have a useful Local Authority Toolkit which can be viewed through the following link <https://www.mobileuk.org/5g-local-authority-toolkit>.

5. Site Selection Process

Alternative sites considered and not chosen (not generally required for **upgrades/alterations to existing sites** including redevelopment of an existing site to facilitate an upgrade or sharing with another operator)

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

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

The applicant's site selection strategy is to keep the overall environmental impact to a minimum. Utilising existing masts is always progressed where it is technically and legally possible and where it is the local planning authority's preferred environmental solution. New sites are only developed where there are no viable or accessible alternatives or it is the local planning authority's preferred approach. The feasibility of the acquisition, build and maintenance of the site also needs to be taken into account.

Site Type	Site Name and address	NGR	Reason for not choosing site
GF	Land at the junction of Bowes Street and Caythorpe Street, Moss Side, Manchester, M14 4UZ	384054, 395052	Consent was granted at this location for a monopole and cabinets in January 2021 (application reference 128708/TEL/2020). Unfortunately, it has not been possible to implement this consent due to underground services in the pavement, hence this alternative site location.
GF	Junction of Lloyd Street South & Edith Avenue, Moss Side, Manchester, M14 7HY	384293, 394994	This has been included as it is at the centre of the search area – the ideal location in terms of the coverage it would provide. It is a dense residential street area and surrounded on all sides by houses. There is potentially space for the equipment, however this would interfere with sight lines at the adjacent road junction.
GF	Junction of Lloyd Street South & Parkside Road, Moss Side, Manchester, M14 7HS	384242, 394892	There is space in the footpath adjacent to a residential building which was previously a public house. This was considered as not as suitable as the application site due to its proximity to residential property and lack of tree screening for a development. This site was therefore discounted.
GF	Outside of parade of shops, Lloyd Street South,	384252, 394890	This site is opposite the previous option. It was discounted for the same reason, and because of the proliferation of services in the footway which would make it difficult to find space for an installation.

	Moss Side, Manchester, M14 7HS		
GF	Maine Road, Moss Side, Manchester, M14 7NQ	384366, 394966	There is a large pavement area with sufficient space for the required equipment. However, there is a large water main under the pavement and the site cannot be used.
GF	Lloyd Street South, Moss Side, Manchester, M14 7HQ	384196, 394730	This site backs onto an area of open space so is not immediately adjacent to residential properties. It has been discounted due to its narrow pavement, and because it is too far south and getting too close to an existing site.

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

N/A

Additional relevant information (planning policy and material considerations):

VISUAL IMPACT AND APPEARANCE

Visual impact has been minimised as far as practicable. New 5G coverage, and enhanced 4G coverage, to the area can be achieved with only minimal harm to the surrounding area.

It is acknowledged that the site would be visible, and that the area surrounding the site is predominantly residential in character. However, the specific siting that has been chosen would ensure there would only be a minimal harm to the area, taking into account the limited siting options. Whilst the equipment would be visible, visibility does not necessarily equate to harm, and it is considered the impact of the development would be not be excessive. The site is located so that it is not immediately adjacent to residential properties. The impact of views from residential properties would be mitigated to an acceptable level by the substantial trees located to the west of the site. These trees would act as a screen or a backdrop, depending on viewpoint. In addition, the equipment is proposed to be coloured dark green, to benefit from the siting close to the trees. Existing street furniture, in particular lighting columns, provide current vertical features in the streetscene, which would allow the equipment to assimilate into its surroundings.

It is considered that the proposal utilises the most suitable design available to meet coverage demands and to provide suitable coverage to the area. It is important to keep the impact of telecommunications development in the area to a minimum and it is considered this proposal achieves this. The benefits of the proposal also have to be considered. New 5G, and enhanced 4G coverage would be provided to the surrounding area for H3G from the development and it is considered the significant public benefits of the proposal, with improved connectivity to this part of Manchester, outweigh the minimal impact on visual amenity.

PLANNING POLICY

National Planning Policy Guidance

National Planning Policy Framework (2021) (NPPF)

The National Planning Policy Framework came into force in 2012. The guidance has most recently been revised in July 2021. 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."

Further to this, paragraph 38 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 enhanced mobile communications services to the surrounding area, bringing about substantial public benefit both socially as well as the allowing for certain businesses to expand, adapt and thrive as well as access new markets. Reliable wireless technology also allows for home working, and the creation of the 'virtual office', thus reducing the need to travel and contributing to the sustainability agenda.

Government advice in recent years has been to promote and encourage communications services. Within his presentation to Parliament in July 2015 of the Government report "Fixing the Foundations: Creating a more prosperous nation" the Chancellor of the Exchequer reiterated the importance of a high-speed digital communication infrastructure. *"7.1 Reliable and high quality fixed and mobile broadband connections support growth in productivity, efficiency and labour force participation across the whole economy. They enable new and more efficient business processes, access to new markets and support flexible working and working from home."*

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

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 114 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 115 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"*.

By proposing a single slimline development to provide enhanced coverage and capacity for multiple technologies, the proposal is in line with the above policy.

It should be noted that paragraph 118 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"*.

In terms of heritage assets, section 16 of the guidance deals with 'Conserving and enhancing the historic environment'. Paragraph 189 sets out that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. Paragraph 202 states: *"where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."* The site is located close to Alexandra Park, a designated heritage asset. It is considered there would be a less than substantial harm, due to the distance involved and the mitigation of the trees in the area, and that any very limited harm would be outweighed by the significant benefits of the proposal.

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 Manchester City Council, relevant to the proposal, comprises the Core Strategy 2012-2017 and the Extant Unitary Development Policies. Most relevant to the proposed development is saved policy DC17.1 of the Extant Unitary Development Policies, which deals specifically with Telecommunications. The policy is copied below for ease of reference:

DC17.1 Applications for telecommunications developments will normally be approved if the Council can be satisfied that the development has been sited and designed to minimise its impact on residential amenity and in environmentally sensitive areas. Wherever possible, the Council will expect the potential of existing buildings and masts, including the sharing of such facilities, to be fully explored before agreeing to additional separate development.

In this case there are no existing installations within the area, and no suitable buildings have been identified, therefore the sequential approach led to the search for a new greenfield solution. A slim and unfussy design of pole is proposed to ensure it would not harm visual amenity or the character of the area. Although a relatively tall structure in a predominantly residential area, it is considered the specific siting on a busy main road and adjacent to substantial trees to provide a high degree of screening, would mitigate the impact of the development to an acceptable level. The lack of suitable alternative sites should be taken into account in what is a difficult search area.

The proposal therefore complies with the above policies and no conflict with any other aspect of the plan has been identified.

Summary

National planning policy is to facilitate the growth of new and existing telecommunications systems, and operators have obligations to meet customer demands for improved quality of service. This development proposes improved coverage to the surrounding area for H3G.

The operator is limited with regards to available options for siting telecommunications within the locality. 5G coverage requires more masts to deliver the same levels of coverage than lower frequencies and as such, the search areas and available options within each has become smaller and often heavily constrained by technical and planning considerations. A list of discounted options has been provided within this document which demonstrates that alternative options have been considered and discounted in favour of the option submitted under this application.

A simple design solution is proposed to mitigate visual impact and prevent harm to the local environment so far as practicable. Significant weight should be given to the public benefits associated with the provision of improved coverage and the introduction of 5G, which have been set out earlier in this document.

The proposed development is compliant with the relevant policies from the NPPF and Development Plan, as outlined within this supporting statement.

The proposal is fully compliant with ICNIRP guidelines and declaration of compliance has been provided.

As such, it is respectfully requested that this application is approved.

Confirmation that submitted drawings have been checked for accuracy

Name:	Chris Andrews	Telephone:	07886 379959
(Agent)			
Operator:	H3G UK Ltd		
Address:	C/o Agents Sinclair Dalby Ltd, 3 Princes Street, Bath, BA1 1HL	Email Address:	chris.andrews@sinclairdalby.co.uk
Signed:		Date:	11 May 2022
Position:	Planning Department	Company:	Sinclair Dalby Ltd
		(For and on behalf H3G UK Ltd)	