

Date: 18th October 2021



Our Ref: A11281 – St Cross with St Paul

Chief Planning Officer
Manchester City Council
Town Hall
Manchester
M60 2LA

Submitted via Planning Portal

Dear Sir or Madam,

FULL PLANNING APPLICATION FOR THE UPGRADE OF THE EXISTING TELECOMMUNICATIONS AT ST CROSS WITH ST PAUL CHURCH, 611 ASHTON NEW ROAD, CLAYTON, MANCHESTER M11 4RU. NGR E:388015 / N:398540.

We are planning consultants retained by NET to submit planning applications on behalf of Telefónica O2 UK Limited and Vodafone Limited who entered into a network sharing agreement. These arrangements will be overseen by Cornerstone Telecommunications Infrastructure Ltd (Cornerstone) which is a joint venture company owned by Telefónica UK Limited and Vodafone Limited.

This development is for:

"The removal and replacement of 6no antennas, installation of 6no new antennas behind 3no new replica GRP louvres and 2no GPS nodes on the western elevation and associated ancillary development thereto."

Enclosed is the following:

- BACS for £462 made payable to planning portal
- Drawings A11281 – 100,200,201,300,301,302,400,401,403,404,606_A.
- Application forms
- ICNIRP Certificate
- Digital Public Benefit Brochure
- Health summary
- Mobile phones and health research summary
- EMF guidelines
- 5G services

We trust you will find the enclosed information sufficient to register and validate the application. If however you require any further information, please contact Rebecca Skerrett on 0161 956 4305 or Rebecca.skerrett@avisonyoung.com

Yours faithfully,

A handwritten signature in black ink, appearing to read "R. M. Skerrett". The signature is written in a cursive, slightly stylized font.

Avison Young
International Property Advisors

DESIGN ACCESS AND HERITAGE STATEMENT

The following design access and heritage statement is enclosed in support of this proposal and demonstrates the general development principles that have been adopted in the final detailed design of this proposal.

1. HISTORY & BACKGROUND

This proposal relates to the upgrade of an existing telecommunications site at St Cross with St Paul Church, 611 Ashton New Road, Clayton, Manchester M11 4RU.

The church is a Grade II* listed building.

The list entry for the site is 1283072

The site was first listed 18th December 1963.

Historic England Extract:

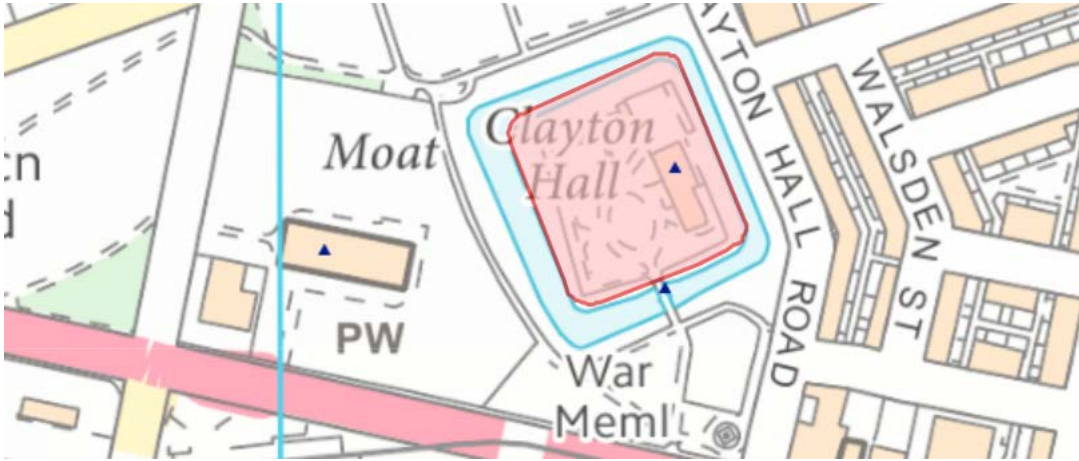
MANCHESTER

SJ89NE ASHTON NEW ROAD, Beswick And Clayton 698-1/5/525 (North side) 18/12/63 Church of St Cross (Formerly Listed as: ASHTON NEW ROAD, Clayton Church of St Cross)

II*

Church. 1863-66, by William Butterfield. Red brick with multiple bands of sandstone and blue brick, much blue brick diapering, and sandstone dressings; steeply-pitched slate roofs. Gothic "Middle Pointed" style. Tall 7-bay nave with low north and south aisles, west narthex, south west tower with south porch, full-height 2-bay chancel with low transepts. The tower is narrow and tall, with slender angle buttresses and a steep pyramidal roof of banded slate, and has a gabled south porch with 2-centred arched doorway, very narrow lancets to the next 2 stages, and triple-lancet louvered belfry windows. The nave has a lean-to 3-bay narthex at the west end, with a cusped doorway flanked by square-headed windows, and above this three 2-light west windows with quatrefoils in the heads and a simple plate-traceried rose window above; and tall 2-light clerestory windows. The chancel has 2 pairs of similar clerestory windows, and a 5-light east window set very high. The aisles have 2-centred arched 2-light windows alternately paired and single; and the transepts have twin gables and 2 windows like those of the aisles. Interior: 5-bay aisle arcades with quatrefoil piers, 2-centred double-chamfered arches and diapered spandrels; banded aisles and clerestory, diapered west end; arch-braced roof trusses; high chancel arch; geometrical-pattern painted panelling to chancel with carved stiff-leaf frieze, and above this trefoil-headed blank arcading with polished shafts.

The site is also adjacent to Clayton Hall a Grade II listed building as shown by the blue triangles in the extract below:



The site is not located within any conservation areas.

The proposed work falls within the Ecclesiastic Exemption (Listed Buildings and Conservation Areas) Order 1994 (as amended) and therefore a Listed Building application under the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) is not required as this will be done through the Faculty process. You may be consulted separately pursuant to the Faculty Jurisdiction Rules 2013 in relation to this proposal.

NET has worked closely with the churches for over 15 years and is aware of the protocols of digging within the grounds of a church and respect the sensitivity that this entails. The faculty application also has measures in place to ensure that all works are respectful of the potential of unearthing archaeological artefacts.

Where the louvres are to be replaced with GRP, the original louvres will be stored and can be reinstated if the telecommunications equipment becomes obsolete.

Planning History

An application was submitted and approved on 6th January 2020 reference 125728/FO/2019 for 1 No. GPS node located on the south western elevation.

This GPS was never installed and this application now supersedes this approval and further upgrades the site.

1.1. NET

NET has forged a close relationship with the churches and has opened up a portfolio of church sites to the operators. NET oversees the whole of the design and build process right from the initial negotiations with the church to the build and the maintenance of the site.

Many of the 16,000 parish and guild churches across England are suitable for housing installations and are widely used by the telecoms operators.

Church buildings have a special significance in the communities they serve, and the mission and environment of the church and its many listed buildings have to be protected. The Church of England has a strict legal process for granting permission to change the fabric of a

church building, and this applies to any telecoms installation. Without full understanding of these special needs, church installations can be time consuming and difficult for both the operators and parishes concerned.

NET has worked with the Archbishops' Council to develop a standard approach to both the practical and legal aspects of telecom installations; this has resulted in a quicker and easier process for the applicant.

Church buildings often provide good solutions as they are normally one of the tallest structures in an area and the antennas can be concealed within the structure however this has not been possible in this particular case.

1.2. Background to Cornerstone

For some years Vodafone and Telefonica (O2) have been operating a network sharing agreement – broadly similar to the Orange/T-Mobile/Three arrangement. This arrangement allowed each company to share the other party's installation.

In September 2012 approval was received from the Office of Fair Trading for the formation of a new company – Cornerstone Telecommunications Infrastructure Ltd (Cornerstone).

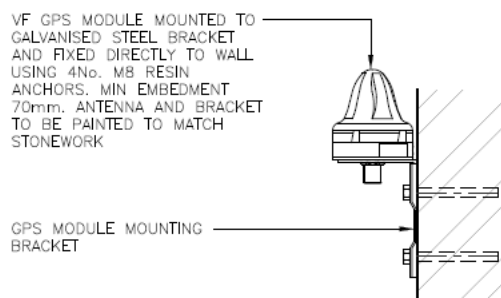
1.3. The proposal

“The removal and replacement of 6no antennas, installation of 6no new antennas behind 3no new replica GRP louvres and 2no GPS nodes on the western elevation and associated ancillary development thereto.”

The Telefonica GPS node already has permission but has not been installed the drawings therefore refer to the node as proposed rather than existing as it has not been installed.

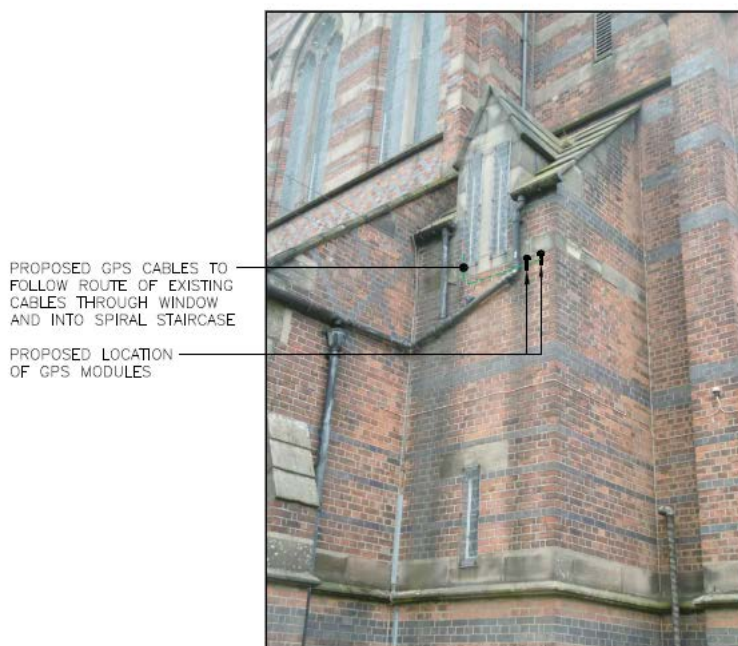
The GPS node requires permission as it is mounted externally on a listed building at a height of 6.25 metres AGL. The swap out and upgrade of the existing antennas do not require planning permission as they are located internally and will utilise the existing steelwork as much as possible.

The GPS node receives information but does not transmit; it has to be positioned to have a clear view of the sky to receive satellite information. A GPS module is a small cell antenna measuring 69mm diameter x 120mm (as detailed below). The GPS module is required for TDD (time division duplex) technologies, specifically in relation to providing 4G and 5G coverage.



ELEVATION ON GPS MOUNTING
(1:5)

The works will be carried out by specialist crafts people to ensure that the fabric and integrity of the building is not harmed details of the node are shown on the photograph below:



GPS LOCATION PHOTO
(NTS)

The nodes will be painted to match the church.

We are proposing to upgrade the existing antennas internally and are proposing an additional 6 No. antennas which will again be positioned internally and will utilise the existing steelwork where possible. The Listed building element will be undertaken by Faculty under the Ecclesiastical exemption route. However it is necessary to replace the louvres in the centre openings on the North, East and West elevations. The louvres will be replaced with Glass Reinforced Plastic (GRP) which allows the signal to transmit. The replacement louvres will exactly match the existing therefore visually there will not be any visual difference. The original louvres will be stored and can be reinstated if / when the telecoms installation becomes obsolete. This is a requirement of the Faculty permission.

Below is examples of GRP louvres which illustrate how the GRP is moulded and coloured to exactly replicate the existing. It should also be noted that some of the louvres have previously been replaced with GRP. Some council's accept that as there is no material alteration to the exterior of the church that permission is not required and the works will be covered by ecclesiastical exemption and should be dealt with under the faculty application.



Above are examples of GRP timber louvres and below is GRP stone work and Slate.





The louvres are made bespoke to each church to ensure an exact match. The examples above are to illustrate how the GRP can be moulded to replicate stone, timber and slate. The replicas are indistinguishable from the originals.

1.4 Design Considerations

The proposed installation has been positioned internally within the church, the only external elements are the GPS nodes (one which already has permission) which have been positioned sensitively to avoid a detrimental impact on the heritage of the church. The node is very small and is located on the south western elevation of the tower. Due to the small scale of the antenna and its height at 6.25 metres above ground level the antenna will not be particularly noticeable. In addition the node will be painted to match the church tower to further reduce the visual appearance.

The louvres will be replaced and will be bespoke to the church to ensure an exact match and therefore there will be no material alteration to the exterior of the church.



Above is the church when viewed from Ashton New Road, as can be seen the node would be screened from public vantage points by the mature trees which surround the site. The louvres are more than 10 metres above ground level and due to the bespoke nature of the replacement louvres the works will not be visually apparent.

1.5 Planning Policy Considerations

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that Local Planning Authorities should determine proposals in accordance with development plan policies, unless material considerations indicate otherwise. Material considerations may include, inter alia, central government guidance, High Court and Inspector's decisions etc.

1.6 Local Policy

Manchester's Local Development Framework Core Strategy Development Plan Document (2019 Citywide development control policies) and the saved Unitary Development plan policies are relevant in the determination of this application:

In particular, the following policies are relevant in the determination of the proposal:

Core strategy:

Policy SP1 and DM1

Policy SP1 – Spatial Principles:

All development should:

- optimise the City's economic performance
- extend economic benefits to residents and/or neighbourhoods
- contribute to the decoupling of growth from emissions

- improve and contribute to lifetime neighbourhoods of choice and place shaping adapt to and mitigate for climate change
- be located to reduce the need to travel
- consider the needs of all members of the community
- make a positive contribution to the health and wellbeing of residents
- seek to improve community safety and reduce crime
- be the most efficient use of natural resources
- improve the quality of the natural environment and the built environment
- reuse previously developed land wherever possible

In terms of the above the provision of good connectivity will entice businesses to an area and will allow people to work at home which in turn has economic benefits to an area and reduces the need to travel which is in line with this policy. The proposal is therefore in compliance with policy SP1.

Policy DM1 sets out a list of guidance which development should have regard to:

The policy is not particularly relevant in the determination of this application due to the small scale of the proposal, however criteria 1 in relation to siting layout scale form and massing is appropriate. In terms of this element, the antenna is small in scale measuring 69mm by 120mm and therefore is appropriate in scale and will be coloured to match the tower to further reduce its presence.

Saved Unitary Development Plan:

Policy DC17 1 – Telecommunications

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 terms of this policy the proposal is to upgrade an existing site. The GPS antenna is mounted externally adjacent to the Telefonica one which has already been approved by the council but will not be overly visible given its size and careful positioning on the building. Additionally from public vantage points due to the screening of the site by tall trees, the installation will not be visible. The replacement louvres will not alter the external appearance of the church. There are no residential properties in proximity to the site.



The photo above illustrates that there are a number of mature trees surrounding the site and that views of the node will be limited given its small scale and its orientation on the church. The proposal is therefore in compliance with policy DC17.

1.7 National Policy

National Planning Policy Framework

This legislation was revised in July 2021. In relation to this policy the following sections are relevant in determining this application:

Section 2 – Achieving Sustainable Development

Paragraph 7 – *“The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.”*

The NPPF also encourages the achievement of sustainable development which can provide public benefits to building stronger and more competitive economic areas, as well as enhancing social communities through increased communication and connectivity. These benefits feed into the overarching economic and social objectives of the NPPF.

Section 4 – Decision-Making

Paragraph 38 – *“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. Decision-makers at every level should seek to approve applications for sustainable development where possible.”*

Section 6 – Building a strong, competitive economy

Paragraph 81 – *“Significant weight should be placed on the need to support economic growth and productivity... This is particularly important where Britain can be a global leader in driving innovation.”*

Section 10 – Supporting high quality communications

Paragraph 114 – *“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.”*

In relation to these paragraphs, the Government’s Industrial Strategy sets out a vision to drive productivity improvements across the UK, and sets out a delivery programme to make the UK a leader in *“artificial intelligence and big data”*. The improvement of telecommunications capacity and provision of 5G is imperative to allow for areas to be connected, and is essential for economic growth which is expected to be delivered and upgraded over time.

Paragraph 115 – *“The number of radio and electronic communications masts, and the sites for such installation, 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.”*

This proposal is for the upgrade of an existing site. The installation of additional antennas will ensure that the site is future proofed for the foreseeable future. The site is in compliance with National policy of upgrading existing sites and ensures the continued provision of high quality digital infrastructure in this area. A network evolves around existing sites and one site links with another. If an existing site cannot be upgraded then an alternative site within proximity would be required. Due to the topography of the area and lack of alternative buildings it is likely that to provide the coverage required in this area that at least 2 streetwork masts would be required, which would have a far greater visual impact on the area and the host building than the upgrade of this site which has very little equipment located externally.

Paragraph 116 – *“Local planning authorities should not impose a ban on new electronic communications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of electronic communications development, or insist on minimum distances between new electronic communications development and existing development. They should ensure that:*

- a) They have evidence to demonstrate that electronic communications infrastructure is not expected to cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and*
- b) They have considered the possibility of the construction of new buildings or other structure interfering with broadcast and electronic communications services.”*

Paragraph 117 – *“Applications for electronic communications development (including applications for prior approval under the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development. This should include:*

- a) The outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed near a school or college, or within a statutory safeguarding zone surrounding an aerodrome, technical site or military explosives storage area; and*
- b) For an addition to an existing mast or base station, a statement that self-certifies that the cumulative exposure, when operational, will not exceed International Commission guidelines on non-ionising radiation protection; or*
- c) For a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure and a statement that self-certifies that, when operational, International Commission guidelines will be met.”*

In relation to these paragraphs, the proposal complies with policy. Consultations were sent to the LPA, ward councillors and MP on 12th August 2021. To date they only response has been from the LPA who have asked for further information. An ICNIRP certificate is submitted as part of the application and the proposal utilises an existing building and an existing site.

Paragraph 118 - *“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.”*

Section 12 – Achieving well-designed places

Paragraph 126 – *“The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. 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 relation to this, the proposal is of a good design utilising an existing building and upgrading an existing site. The GPS nodes will be painted to match the tower, to further reduce their appearance.

Code of Best Practice for Mobile Network Development – June 2016

The Code of Best Practice was developed by a Working Group consisting of representatives from many organisations, including Mobile UK (on behalf of the Mobile Network Operators), the DCMS and DEFRA, and Historic England.

Of particular interest are Sections 4.3 and Section 5.

Section 4.3 relays the importance of maximising the use of existing infrastructure by upgrading it to improve capacity and coverage. This proposal upgrades an existing site to improve capacity.

Section 5 explains how Mobile Connectivity in the 21st Century is now an imperative part of everyday life. People now choose to access the Internet using their mobile device over

connecting to fixed broadband networks. This Section stresses the importance of good connectivity to improve the economy, to promote social inclusion, to deliver public services such as NHS reminders by text message and to promote sustainability (by enabling home working). The proposed upgrade will improve capacity, which will allow more people to access the network in this busy locality. This will subsequently improve the above factors and provide accessibility to more customers.

National Report & Reviews

The following reports highlight the importance of 5G technology. The recent pandemic has also shown how people have come to rely on connected services and going forward there is likely to be more home working than previously and the mobile network operators have to ensure that they provide reliable and resilient network performance to aid in this.

As such, mobile network operators have been significant contributors to the global response to the virus.

Equally, hospitals and medical experts will look to connect in real-time with their patients to diagnose and treat disease at the first point of contact to improve patient care. Manufacturers will look to leverage robotics, artificial intelligence (AI) and superfast connectivity to enable the remote management of production lines and to support the faster reconfiguration of factories.

Staying connected has become a defining feature of the modern economy and a significant trend of the 21st century. Therefore, 5G will prove fundamental to fulfilling the potential of digital connectivity, as in the above examples, and will help drive the economy after the COVID-19 outbreak.

Councils and Connectivity 2 – A report by Building Mobile Britain and Mobile UK, May 2019

“Mobile operators have ambitious plans to further enhance their networks and will soon be starting initial commercial rollout of 5G, the next generation in mobile technology. This ambition matches the Government’s objective for the UK being a world leading digitally connected economy. However, mobile operators cannot achieve this objective alone – action is needed by all stakeholders, including national and local government. It is vitally important that residents and businesses can access 5G in the future. It promises to radically transform our economy and society for the better ...it is vital that councils attempt to understand why good quality mobile connectivity will become more important, and what they need to do to ensure that local residents and businesses have access to the best possible mobile connectivity in the future.”

A councillor’s guide to digital connectivity – published by the Local Government Association, September 2019

“With better access to high speed and reliable broadband and mobile connections, local communities can access public services more conveniently and purchase goods online at a lower cost. People can work from home, cutting out their commute and improving their quality of life. Businesses can grow, become more productive, sell their products in a global

market and access a raft of services not available to those offline. Tourists can find out more information about local attractions and share photographs of their experiences with friends and on social media. In contrast, areas stuck in the digital slow lane are less attractive places to live, work and visit, and risk being left behind as other areas reap the benefits of our digital revolution.

5G will enable exciting new services and applications including:

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

Future Telecoms Infrastructure Review – Published by DCMS, July 2018

“When looking at the speed, resilience and reliability that consumers want and businesses need in order to grow, it is clear that full fibre and 5G are the long-term answer. These technologies have the potential to transform productivity, and to open up new business models. Full fibre networks are faster, more reliable, and more affordable to operate than their copper predecessors. 5G will deliver faster and better mobile broadband, and enable revolutionary uses in industry sectors like manufacturing, health and transport alongside finishing the roll out of 4G networks to meet existing mobile demand, we want the UK to be a world leader in 5G to take early advantage of this new technology. We have set a target that the majority of the population will have 5G coverage by 2027 the technical capabilities and performance characteristics of 5G are clear. 5G is expected to deliver faster and better mobile broadband services to consumers and businesses, and to enable innovative new services for industry sectors, including manufacturing, transport, immersive technologies and healthcare.”

Statement of Strategic Priorities for telecommunications, the management of radio spectrum, and postal services – updated version published by DCMS October 2019

The Government is committed to providing the UK with world-class digital connectivity that is gigabit-capable, reliable, secure and widely available across the UK. We want the nationwide deployment of gigabit-capable broadband networks at pace. We also want to be a world leader in the next generation of 5G mobile technology, with deployment to the majority of the country by 2027. Alongside improving 4G coverage to meet existing mobile demand, the Government wants the UK to be a world leader in 5G, and for the majority of the population to have 5G coverage by 2027. 5G is expected to deliver faster and better mobile broadband services to customers and businesses, and to enable new services for industry sectors, including manufacturing, logistics and immersive technologies. Cornerstone Industry Site Specific Supplementary Information England V.1 20190311 5G creates an opportunity for market expansion - in the type of wireless services available and in the number of providers

of networks and services. The Government's view is that there would be strategic advantages in a model that maintains the benefits of network competition between multiple mobile network operators, while enabling new solutions to connectivity challenges, including in-building coverage, rural coverage and industrial applications."

The above shows the importance of rolling out a 5G network and this application will future proof the site for the foreseeable future and ensure that residents and businesses have good connectivity and will ensure that they are not excluded from accessing a good mobile network. Good connectivity is seen by the Government as the way to economic recovery and the public benefit of such infrastructure outweighs any minimal harm to the area.

1.8 Site Need and Identification

This site is required to be upgraded with the addition of 2 No. GPS nodes (one of which already has permission) the upgrade of the existing 6 No. antennas and the Installation of 6 No. additional antennas located internally within the church and the replacement of louvres with GRP and associated development thereto. The upgrade is required as part of the 4G/ 5G upgrade of this site which will ensure that the site can cope with the foreseeable demand placed on it.

In the assessment of this application, material weight should be given to the public benefits that will be provided to local businesses , residents and visitors in this area. The site will form part of an improved coverage network which will also introduce 5G technology to allow for faster download speeds and better signal.

The demand and focus on delivering the 5th generation of mobile phone technology is the primary objective of licensed operators in the UK. In today's climate the existing 4G network has allowed users to video stream at much faster data speeds allowing the integration of smart phones into wider uses than previous generations. The inevitable consequence of technological advancements means that customers expect tasks to become even quicker and simpler.

To quote the *5G and Future Technology* document, *"It is estimated that 5G will directly contribute to an additional £7 Billion a year to the UK economy in just six years from roll-out. 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. But to do so the network needs to be surveyed, designed and planning approval obtained. 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."*

The introduction of 5G technology will improve the country's digital connectivity and appeal to visitors and businesses alike through the creation of smarter technology which will benefit the British economy.

"Examples of this new world that will emerge from ubiquitous 5G coverage involves such things as connected and autonomous vehicles, traffic management, smart manufacturing with heterogeneous autonomous machines, direct machine to machine communication, advanced medical devices, automated agriculture, far greater security provision, more stable and reliable connectivity and advances in further application development with uses not yet identified. All of the

above provides an insight into the future development of connectivity in our modern world and also provides a further insight into the expected minimum eight-fold increase in data usage by each mobile operator over the next 5-6 years."

The national government recognises the importance of the 5G rollout which is a stance taken by government minister Margot James, the NPPF and The National Infrastructure Commission.

"5G has the potential to dramatically transform the way we go about our daily lives, and we want the citizens of the UK to be amongst the first to experience all the opportunities and benefits this new technology will bring...." – Margot James, the government minister for digital).

"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." – NPPF (July 2018)

"Getting 5G deployment right will be critical in a future where connectivity is becoming integral to almost all parts of the economy, and the UK will put its future growth and competitiveness at risk if it falls behind." – 'Connected Future' National Infrastructure Commission 2016

Although Central Government understands that this may present concerns with the various design solutions proposed, it is important that all Local Planning Authorities understand the technical needs of 5G and better understands the wider advantages of such new technology. The government have also expressed support for new telecoms installations and the deployment of new technology. It is seen as essential for the country to develop and exploit the advantages of such new technology to the direct benefit of the public and the economy.

1.9 Health and Safety

There are about 1400 peer-reviewed publications on the biological and health effects of radiofrequency (RF) signals, which are used in mobile communication technology. The scientific community have collated, summarised and assessed these publications in research reviews, the most influential in the UK being the Stewart Report (Mobile Phones and Health) by the Independent Expert Group on Mobile Phones under the chairmanship of Professor Sir William Stewart. These research reviews are used by Governments to develop policy on exposure to radio frequency signals.

Published in May 2000, the Stewart Report concluded that the balance of evidence did not suggest that exposures to radio frequency fields below international guidelines could cause adverse health effects, although it acknowledged that biological effects might occur below these values. The report stressed, however, that a biological effect does not necessarily mean a negative impact on health. Walking, drinking a glass of water or listening to music all produce biological effects.

Since 2000, over 30 further reviews have been carried out, carefully considering many hundreds of pieces of research. Most have made similar recommendations and have come to similar conclusions: that research should continue to address any gaps in the knowledge; and

that overall, the possibility of adverse health effects from mobile communications remains unproven.

Further, the reviews stress that exposures from base stations (or masts) are, in the words of the National Radiological Protection Board (now part of Public Health England), “extremely unlikely to cause any effects on biophysical grounds.” [A Summary of Recent Reports on Mobile Phones and health (2000-2004), NRPB, Jan 2005]

In June 2011 the World Health Organisation (WHO) noted that “A large number of studies have been performed over the last two decades to assess whether mobile phones pose a potential health risk. To date, no adverse health effects have been established as being caused by mobile phone use” WHO factsheet 193: Electromagnetic fields and public health: mobile telephones. In April 2012 the independent Advisory Group on Non-ionising Radiation (AGNIR) published a report entitled “Health Effects from Radiofrequency Electromagnetic Fields”. This report concluded that there is no convincing evidence that mobile phone technologies cause adverse effects on human health. AGNIR also found that although a substantial amount of research has been conducted, there is no convincing evidence that RF field exposure below the internationally agreed guideline levels applied in the UK causes health effects in adults or children.

In addition, the International Commission on Non-Ionizing Radiation Protection reviewed its guidelines in 2009 and concluded “*ICNIRP reconfirms the 1998 basic restrictions in the frequency range 100 kHz–300 GHz until further notice.*” ICNIRP statement on the “Guidelines for limiting exposure to time-varying electric, magnetic and electromagnetic fields (up to 300 GHz)”.

Research reviews are used by guideline setting bodies and Governments to develop advice and public policy on exposure to the signal used by mobile communications technology.

The proposal for this site has been designed within International Commission on Non-Ionising Radiation Protection (ICNIRP) public exposure guidelines and therefore Health and Safety concerns should not be a planning consideration. An ICNIRP certificate is submitted with this application confirming that the site is in compliance.

In addition to this, The Institution of Engineering and Technology's *Guide for Local Planning Authorities regarding 5G Masts and Small Cells*, provides a brief overview of 5G technology and the health issues that are often misunderstood. It concludes by saying, “*Small 5G base stations in our towns and cities will allow improved network coverage. They will reduce radio wave exposure to individual smartphone users and improve local 5G capacity for all manner of useful bandwidth-hungry applications. And a good 5G fibre base local broadband infrastructure will be important to local communities over the coming decades in view of the ever-increasing amounts of data being consumed by the general public.*”

An ICNIRP certificate accompanies this application and we have also included further information on health and safety.

2.0. CONSULTATION

Consultation was originally carried out with the Local Planning Authority, and the site was rated Amber in light of this rating we consulted with Councillors Thomas Frederick

Robinson, Sean McHale, Donna Ludford and local MP Lucy Powell.

No responses have been received as a result of this consultation.

3.0. ACCESS

Access to the site will remain unchanged, as will the on-going traffic visiting the site. We do not envisage additional maintenance visits incurring, and being new equipment, the likelihood of requiring visits for repair is remote.

4.0. PLANNING SUMMARY

Permission has previously been given for 1 No. GPS node on the tower and we are proposing to add an additional node. The louvres where the existing equipment has been installed have previously been replaced. This is an upgrade of an existing site and utilises an existing building therefore alternative sites do not need to be considered in line with the NPPF. The nodes will be painted to match the tower to further reduce their presence. People have come to rely on connected services and it is likely going forward that there is going to be more home working. It is therefore considered that the public benefits provided by the upgrade of this site outweigh the minimal visual change in the appearance of this site.

5.0 CONCLUSION

The external works proposed are minimal, the nodes will be painted to match the tower and will have a negligible impact on the host building. The site will be valuable in the Government's desire of connectivity and ensuring that users can connect to the network wherever and whenever required. It is considered that the proposal complies with national and local policy and the public benefits outweigh any perceived visual harm.

We hope the above information is sufficient for you to consider this application favourably.