Norfolk House
7 Norfolk Street
Manchester
M2 1DW

T: +44 (0)8449 02 03 04
F: +44 (0)161 956 4009

avisonyoung.co.uk

Our ref. 56017/VP

Date: 13th May 2019

Chief Planning Officer
Manchester City Council
Manchester
M60 2LA

Submitted via the Planning Portal

Dear Sir,

PRIOR APPROVAL APPLICATION FOR THE UPGRADE OF AN EXISTING SITE, COMPRISING THE INSTALLATION OF A HUAWEI APM5930 (AC VARIANT) CABINET, THE SWAP OUT ON A LIKE FOR LIKE BASIS OF THE EXISTING RFC VER. C CABINET FOR AN RFC VER.D CABINET, THE REMOVAL AND REPLACEMENT OF 3NO. EXISTING ANTENNAS WITH 3NO. UPGRADED ANTENNAS LOCATED ON NEW SUPPORT POLES, THE INSTALLATION OF 1NO. GPS NODE LOCATED ON AN EXISTING ANTENNA SUPPORT POLE, AND ANCILLARY DEVELOPMENT THERETO, AT INTERNATIONAL HOUSE, 82-86 DEANSGATE, MANCHESTER, M3 2ER

We are planning consultants retained by MBNL to submit planning applications on their behalf. This proposal is for the upgrade of the existing H3G (Hutchison 3G UK Limited) site.

Enclosed you will find a GPDO planning application prepared on behalf of H3G. They have been licensed to provide a Cellular Network based upon the Global System for Mobile (GSM) standard and Universal Mobile Telecommunications System (UMTS) within the United Kingdom.

The development consists of:

"The installation of a Huawei APM5930 (AC Variant) cabinet, measuring 600 x 480 x 1000mm, the swap out on a like for like basis of the existing RFC Ver. C cabinet for an RFC Ver. D cabinet, measuring 600 x 480 x 900mm, the removal and replacement of 2No. existing antennas with 2No. upgraded antennas located on new support poles, the installation of 1No. GPS node located on an existing antenna support pole, and ancillary development thereto."

Enclosed is the following:

- drawings No. MAN042 – 01, 02, 03, 04, 05, 06 – A1
- Application forms
- Supplementary Site Specific Information
- Planning Statement (including design and access statement)
- ICNIRP Certificate

We trust you will find the enclosed information sufficient to register and validate the application. If however you require any further information, please contact Victoria Parsons on 0161 956 4123 or victoria.parsons@avisonyoung.com.

Avison Young is the trading name of GVA Grimley Limited registered in England and Wales number 6382509. Registered office, 3 Brindleyplace, Birmingham B1 2JB

Regulated by RICS

Yours sincerely



Victoria Parsons
Planner, Telecoms
Avison Young
For and on behalf of H3G UK Limited and EE Limited

1.1 HISTORY & BACKGROUND

Everything Everywhere is a 50-50 joint venture between Deutsche Telekom and France Télécom and was formed in 2010 through the merger of the T-Mobile (UK) and Orange U.K. businesses.

On 3 September 2010, Everything Everywhere announced that Orange would join Mobile Broadband Network Ltd (MBNL), the joint venture management company formed in December 2007 between T-Mobile UK Ltd and Hutchison 3G UK Ltd (H3G UK).

In 2016, Everything Everywhere were chosen to work in conjunction with the Home Office to deliver the Emergency Services Network (ESN), which will deliver a smarter, better and cheaper communications capability.

This application upgrades the existing equipment.

1.2. DESIGN

1.2.1. The proposal

The host site is a Rooftop site located at International House, 82-86 Deansgate, Manchester, M3 2ER. The proposed work comprises the installation of a Huawei APM5930 (AC Variant) cabinet, measuring 600 x 480 x 1000mm, the swap out on a like for like basis of the existing RFC Ver. C cabinet for an RFC Ver. D cabinet, measuring 600 x 480 x 900mm, the removal and replacement of 2No. existing antennas with 2No. upgraded antennas located on new support poles, the installation of 1No. GPS node located on an existing antenna support pole, and ancillary development thereto.

As the site is located within Parsonage Road Conservation Area, and the proposal is for the installation of a cabinet measuring less than 2.5 cubic metres, a Prior Approval application is required.

The drawings also show the replacement of 2No. existing antennas with 2No. upgraded antennas and the installation of 1No. GPS unit on existing support poles on the rooftop. As the site is located in a Conservation Area, Part 16, A.1 (2)(f) and A.1 (6) need to be satisfied for this aspect of the proposal to constitute permitted development. In relation to A.1 (2)(f), the proposal is for the replacement of 2No. antennas. It is not proposed to install any new antennas. "Installation" and "replacement" are differentiated within the legislation. In relation to A.1 (6), the proposed GPS node is a small antenna. It will not be located on a wall or roof slope, and its installation will not result in the presence of more than 2 small antennas on the building. Therefore, this part of the scheme constitutes permitted development. However, they have been included within the description of works for clarity as they are shown on the drawings.

<u>Heritage</u>

Parsonage Road Conservation Area was first designated in June 1985. Its boundaries are Blackfriars Street, Deansgate (a common boundary with the St Ann's Square conservation area), Bridge Street (a common boundary with the Deansgate/Peter Street conservation area) and St Mary's Parsonage. The River Irwell forms the western boundary of the area along the line of the administrative border of the City of Salford.

The proposal is for the upgrade of an existing telecommunications site located at International House. There is no Conservation Area Appraisal for the area, but it is demonstrated that the proposal complies with the council's general heritage policy in **Section 1.2.4.**

1.2.2. Design Considerations

The proposal is for the upgrade of the existing site. The proposed additional cabinet will be located alongside the existing cabinets on the centre of the rooftop. This ensures that the cabinet is located away from the rooftop edges and aids in ameliorating its presence from ground level within the Conservation Area.

The proposed replacement antennas and additional GPS node will be located on new support poles on the building. Visually there will be very little change to the site as a result of the antenna swap. The GPS node is very small and will not be noticeable from ground level.

It is not considered that the proposal will have a detrimental impact on the Conservation Area, or wider surrounding area, as the equipment will be located alongside an established telecommunications site with other equipment cabinets, and permission should not be withheld.

1.2.3 Siting

The site is located on the rooftop of International House, Deansgate. The proposed cabinet is located away from the roof edge. The scheme proposes the least amount of equipment required to upgrade the site.

1.2.4. Planning Policy Considerations

Section 54A of the Town and Country Planning Act 1990 (as amended)(now 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.

1.2.5. Local Policy

Manchester Core Strategy

Manchester Core Strategy was adopted on 11th July 2012. It contains the following policy which is relevant in the determination of this application.

Policy CC 9 – Design and Heritage

In relation to this policy, the proposal is for the upgrade of an existing telecommunications site located with a Conservation Area. It is considered that the scheme will preserve the heritage asset as there will be very little visual change to the site as a result of the proposal.

Greater Manchester Infrastructure Framework 2040

The Greater Manchester Infrastructure Framework provides guidance on the physical infrastructure required in the Greater Manchester region. The Framework contains "Challenge 8: Providing pervasive, affordable, resilient digital connectivity". In relation to this "Challenge", the proposal is for the upgrade of an existing telecommunications site which will increase capacity in this busy area of Manchester City Centre.

1.2.6. National Policy

National Planning Policy Framework

This legislation was formally adopted in July 2018 and replaces the previous version which was introduced in 2012.

In relation to this policy the following sections are relevant in determining this application:

Section 6 – Building a strong, competitive economy
Section 10 – Supporting high quality communications
Section 12 – Achieving well-designed places
Section 16 – Conserving and enhancing the historic environment

The following paragraphs need to be considered in relation to this policy:

Paragraph 80 – "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."

Paragraph 112 – "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 is imperative to allow for areas to be connected, and is essential for economic growth.

Paragraph 113 – "Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged."

In relation to this paragraph, no alternative sites were considered as the proposal is for the upgrade of an existing site which utilises an existing building and proposes only one additional cabinet and a very small GPS unit.

Paragraph 114 – "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 115 – "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 this paragraph, the site is not located near a school or college, or within a statutory safeguarding zone surrounding an aerodrome, technical site or military explosives storage area. An ICNIRP certificate is submitted as part of the application to confirm that the proposal complies with International guidelines. No alternative sites have been considered as the proposal is for the upgrade of an existing site.

Paragraph 124 – "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 paragraph, the proposal is for the installation of one additional cabinet located alongside existing cabinets. The replacement antennas and GPS unit will be located on the existing building. It is not considered that the proposal will have a detrimental impact on the surrounding communities.

Paragraph 189 – "In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary."

In relation to this paragraph, the relevant historic environment records are referred to within this document at **Section 1.2.1** under the sub-section **Heritage**, and the impact of the proposal on their significance is referred to in both **Section 1.2.2** and **1.2.5.**

Paragraph 196 – "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."

In relation to this paragraph, it is considered that the proposal will lead to less than substantial harm to the significance of a designated heritage asset as it is for the upgrade of an existing telecommunications site which has been sensitively designed in light of the designation.

1.2.7 Site Need and Identification

The proposal is to upgrade an existing site; therefore no alternative sites were considered as the proposal has very little visual impact on the area.

In addition to the above, the site will form part of an improved upgraded network for H3G & EE, which will allow faster downloading and the reduction in call drop outs.

Coverage - The licence granted to H3G & EE demands that strict coverage qualities are met. It is essential that the benefits of mobile telephones are available for all the population. The changing customer use of mobile phones also demands that networks and coverage is available at home, in the workplace, while shopping, enjoying leisure activities or while on the move.

Quality - In order to ensure coverage within buildings such as homes, shops, offices etc. the radio signal has to be of sufficient strength to penetrate walls. In urban and suburban areas a dense network of base stations is therefore required, some less than 1km apart.

Capacity - As the use of and demand for mobile phones has increased the number of sites required to provide Network capacity has increased. Each cell or base station can only handle a finite number of calls so in areas of high use additional cells are required to meet demands on the network and thus avoid existing cells going into congestion.

The radio implication of the site: Radio signals are transmitted through the network by using fixed links at such frequencies that necessitate an uninterrupted line of sight. To achieve this, the installation must reach a sufficient height above surrounding buildings and trees. The installation must also be in a position to provide good in building radio coverage to the target area.

The planning tool identifies deficiencies in the network and predicts the location from which the optimum coverage will be provided. This area is referred to as the search area or cell centre.

It is for these reasons that it is important to achieve a service of quality for mobile users. The main complaints received by mobile telephone operators about their service relate to the problems associated with dropped calls and no service. As more and more people are using tablets and smart phones there is a need to ensure that existing sites can meet this demand. This is one such site as due to the location of the site there is a high level of traffic to the site.

1.2.8 Health and Safety

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 as part of this application to confirm that the proposal complies with guidelines.

2 CONCLUSION

This is an upgrade of an existing site; it is not considered that the proposal will have a majorly noticeable impact on the Conservation Area or wider surrounding area.

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