DESIGN, ACCESS & SUPPORTING STATEMENT

Cell Reference	41447 Rhodes Replacement		
Site Address	Grass verge off Middleton Road (opposite the Three Arrows Public House), Higher Blackley, Manchester, M24 4GY		
Easting	384246	Northing	404717
Description of Development	The installation of a radio base station consisting of a 15 metre Slim-line column, 3 antennas, two equipment cabinets and development ancillary thereto		

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1.0 General Introduction & Site Details

This supporting statement forms part of an application for planning permission on behalf of Telefónica O_2 UK Ltd. The application relates to the installation of a radio base station consisting of a 15 metre Slim-line column, 3 antennas, two equipment cabinet and development ancillary thereto located on a grass verge off Middleton Road (opposite the Three Arrows Public House), Higher Blackley, Manchester, M24 4GY.

This supporting statement aims to assist the Local Planning Authority in their evaluation of the telecommunications proposals, stating clearly the facts and issues surrounding this planning application. It takes into account the matters of address relating to a "Design and Access Statement" which is a requirement of s.42 of the Planning and Compulsory Purchase Act 2004. This supporting statement helps to set out the processes that have taken place towards establishing the siting and appearance of the development which now forms part of this planning application.

O_2 requires this installation as a replacement for their existing telecommunications base which is located on Pylon VJ30 at land to the rear of Baguley Crescent, Middleton. O_2's equipment has been subjected to repeated acts of vandalism/theft over the past 9 months whereby the operator's cables are being cut and the precious metal from inside the cables are being removed and sold for profit. This process involved the thieves climbing the electricity pylons to obtain the cable. O_2 has placed new cable on the pylon on numerous occasions, however the thieves persist and the cables are consistently being removed. Photographs showing the latest spate of vandalism/theft have been included within this application. Barbed wire and anti-vandal paint has been placed on their equipment, however this has not has any effect on the thefts and the problem has continued. Following the last vandalism act O_2 has decided that they cannot safely service this site any longer and they have not replaced the lost cables, resulting in a loss of coverage within this area for their customers. This is also considered to be a safety issue which may well lead to a fatality if thieves continue to climb high voltage electricity pylons. O_2 are therefore proposing the site on Middleton Road, opposite the Three Arrows Public House, as a permanent replacement site for pylon VJ30.

1.1 Description of Application Site and Surroundings

The location of the site is on a stretch of grass verge on Middleton Road, opposite the Three Arrows Public House. There are two existing telecommunications installations located within the operators search area, one of which is O_2's existing in-operable sites on Pylon VJ30, the other being a Vodafone installation located on the adjoining Pylon VJ29. The site is located on a large grassed area opposite a Public House and several small retail units. The M60 motorway passes to the North of the site, whilst the site is located on the busy A576 Middleton Road. The site is located within an area of mature trees which are approximately 9-10 metres in height. To the east of the site lies Heaton Park while there are mature trees in excess of 20 metres locates to the east of the site (please see radio coverage plots in Appendix B. The site is located in a natural break of residential properties whilst there are some residential dwellings located approximately 80 metres to the North and East of the application site.

1.2 Description of Development

The proposed development at this location relates to the installation of a 15 metre high slim-line monopole column incorporating three no. 2G/3G antennas found within the upper section of the mast. The equipment cabinet will be sited at a distance from the Column on Old Hall Lane.

The applicant suggests the column is painted Grey (BS 00A05) whilst the cabinet is painted dark green (RAL 6009). Naturally all proposed development can be painted to the Local Planning Authority requirements if the above are not deemed suitable.

1.3 Access Arrangements

The proposals will be located on a section of grass verge alongside the highway hence there will be no compound enclosure and the development will be accessible within the public realm. Nevertheless the ground based equipment cabinets have an appearance similar to other communications and electrical service boxes found in typical street scenes in which similar access operations can be likened. It is likely that once built, the site will be visited infrequently for maintenance purposes only. Access to the site will be by foot and the operator will insist that all its personnel park on the adjacent Old Hall Lane so that they do

not park on the A576 Middleton Road. In the event of the antennas within the mast needing to be maintained this will be achieved by siting a cherry picker with a hydraulic platform alongside the base station.

It should be recognised that the siting, design and access to a typical streetworks installation can be constraint by a number of parameters which are explained in section 3.4 of this supporting statement.

2.0 Legal Obligation & Technical Justification

2.1 Legal Obligation to Provide a Service

Telefónica O_2 UK Ltd is the operator of an electronic communications network. Telefónica O_2 UK Ltd complies with the Electronic Communications Code as enacted under the Communications Act 2003, which provides the necessary legislative basis to run an electronic communications network. As an electronic communications network operator, Telefónica O_2 UK Ltd has the benefit of Permitted Development rights under Part 24 of Schedule 2 to the Town and Country Planning (General Permitted Development) Order 1995 (as amended).

2.2 Compliance with Other Regulations

'Please accept this letter and its enclosures as a notification in accordance with regulation 5 of The Electronic Communications Code (Conditions and Restrictions) Regulations 2003 as required by the Communications Act 2003. No fee is required for this notification. Telefónica O_2 UK Ltd is obliged, under regulation 6(2) to give one calendar month's notice, in writing, to the planning authority of its intention to install electronic communications apparatus. The apparatus to be installed consists of a 15 metre slim-line monopole column, 3 antennas, two equipment cabinets and development ancillary thereto located on a grass verge off Middleton Road (opposite the Three Arrows Public House), Higher Blackley, Manchester, M24 4GY.

2.3 Technical Justification

PPG8 states that local planning authorities should not question the need for the telecommunications system, which the proposed development is to support (paragraph 6). However, paragraph 5 of PPG8 highlights that in making an application for telecommunications development operators may be expected to provide evidence regarding the need for the proposed installation. The proposed installation is needed to provide replacement 2G/3G coverage which is currently provided by O2's existing installation located on Pylon VJ30 on land to the rear of Baguley Crescent. The operator is looking to provide replacement coverage to the residential / business areas around Heaton Park, together with the M60 ring road and the A576.

The coverage plots and technical justification, enclosed in appendix A, provide an explanation of the operation of the network and the technical constraints on siting. Telefónica O_2 requires replacement coverage in this area of Middleton/Higher Blackley in which the coverage plots provides an indication of the projected radio coverage provided by the sites surrounding the proposal site if they were all operational. It can be seen from the plots that without replacement coverage from the existing pylon installation, the coverage is not contiguous and therefore a site is required to fill a gap in coverage. These plots clearly show how the proposed installation would fill the coverage gap for O_2's existing installation which has not been radiating for some time and would therefore enable continuous coverage to be achieved in the area.

A map is also enclosed in appendix A that indicates the extent of the area in which an installation is required for Telefónica O_2 UK Limited. The search area, within which an installation needs to be established in order to meet the coverage requirement, is constrained by the location and extent of the coverage provided by existing installations in the surrounding area. An installation located outside of this search area would not allow Telefónica O_2 UK Ltd to provide the desired level of coverage and would therefore not adequately fill the current coverage gap.

3.0 Site Selection Process

3.1 Annual Rollout Consultation

Date of last annual rollout information/ submission	1st October 2007
Name of contact	Head of Planning
Main issues/ outcome – This installation was not included within O2's rollout plan as the site requirement only came about due to vandalism/theft issues from O2's existing installation.	

3.2 Database Searches

Was the mast register of the authority responsible for planning used to check for suitable sites by the operator or the authority?	YES	
if no explain why		
Was the industry site database checked for suitable sites by the operator?	YES	
if no explain why		

3.3 Pre-application Consultation

The Government strongly encourages pre-application discussions between operators and local planning authorities in order to find the optimum solution for the development requirements. Paragraphs 9 – 13 of PPG8 go on to advise that pre-application discussions should also be carried out between operators and other organisations with an interest in the proposed development as well as people likely to be affected by the proposals including schools.

In order to explore the possibilities with regard to this proposal a pre-application consultation exercise has been undertaken. This proposal was given an Amber rating when it was assessed against the Traffic Light Rating Model, further details of the Traffic Light Rating Model can be found in Annex D to the Code of Best Practice on Mobile Phone Network Development.

A community consultation exercise was undertaken with local Ward Councillors and local MP. Informative consultation letters were sent out to these parties on the 29th September 2008. No response has since been received following the submission of this information.

3.4 Alternative Sites Considered

In accordance with the licence obligations and advice in PPG8 and the Code of Best Practice the applicant's network rollout team undertook an inspection of the area of search, which 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 including National Grid pylons;
- 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. Mast sharing is always progressed where it is technically and legally possible and where it is the local planning authority's preferred environmental solution. New 'Greenfield' 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.

A number of sites have been considered prior to the proposal site being selected. These were given careful consideration with regard to the impact of development at each location in terms of visual and residential

amenity, other planning issues as well as the technical suitability of each site to O_2. In selecting the site and design of the proposed installation the views that have been received as a result of the consultation exercise have been taken into account. The location considered most acceptable in terms of all these factors was then selected.

It should be recognised that a typical cell search area may contain a number of locations where a streetworks type proposal could be installed. Streetworks style installations consist of a slim-line pole and an equipment cabinet and are predominantly found on areas of adopted highway land such as a grass verge or pedestrian footpath. However, there are a number of common parameters regardless of the visual prominence of the site that prevent sites from being suitable for streetworks installations. When considering locations for possible streetworks installations it is imperative that the parameters below are given full and proper consideration.

The following parameters have a direct influence over the locations at which a streetworks installation can be proposed, if any one parameter is compromised then the location is unsuitable:

- Land Ownership – It is necessary to have the agreement of the landowner to install equipment on their land. Most land immediately adjacent to a highway will be adopted highway. However, this is not always the case and therefore it would be necessary to seek the consent of the landowner;
- Underground Services – The presence of underground services (such as water and gas pipelines or electricity and telecommunications cables) restrict the ability to install equipment due to the depth of the root foundation required for the pole, which must avoid these services. In addition it is necessary for the utility companies to maintain access to these services;
- Proximity to Overhead Services and existing lighting columns – Sites for streetworks installation can be restricted due to the presence of overhead cables (such as overhead telephone and electricity cables) and the proximity of existing lighting columns. Sufficient vertical and horizontal separation is required to allow the proposed antenna to comply with ICNIRP requirements;
- The Width of Footpath that will be remaining once the equipment is installed – Once the cabinet is installed sufficient space must remain to allow pedestrians to pass safely and without having to step into the adjacent road. Typically, local highways authorities will require 1.8 metres of footpath to allow pedestrians, push chairs and wheel chairs to pass safely;
- Access Requirements – Equipment must not obstruct access to driveways, cycle lanes and pedestrian crossings;
- Visibility Splays – Equipment must be sited in order that it does not have a detrimental impact upon the visibility splays of traffic emerging from road junctions and other access routes.

The details of alternative sites considered prior to selecting the proposed site and design are contained in the list below and are plotted on the map attached to Appendix A:

List of Sites Considered

	Site Type	Site Name and Address	NGR	TLM Rating	Reason for Rejection
1	Existing Structure	Existing O_2 installation on Pylon VJ30, Land to the rear of Baguley Crescent, Middleton, Manchester, M24 4QT	E 384385 / N 405048	AMBER	O2 have had their equipment located on Pylon VJ30 for approximately 5 years. Unfortunately, this site is being subjected to repeated theft/vandalism for the metal within O_2's cables servicing their antennas on the Pylon. This issue has been ongoing now for over 9 months and O_2 have decided that they cannot replace the cables any longer, leaving them without any coverage for their customers within this busy area.
2	Greenfield	Rhodes Green Farm, Boardman Lane, Middleton, Manchester, M24 4SP	E 384864 / N 405794	AMBER	O_2 considered erecting a new Greenfield structure at this location; however, in order for the operator to locate on this tower and obtain their coverage requirements it would require a tower of approximately 20 metres in height to erected. It was deemed that a structure of this height/size would form an obtrusive feature within the local area and impact on the visual amenity of the area as well as on the amenity of nearby residential properties on Boardman Lane. In addition, as the site does not have the benefit of any natural screening, the site would be much more visible than the proposed site on Middleton Road.
3	Greenfield	Bradley Hall Farm, off Boardman Lane, Middleton, Manchester, M24 4SL	E 384631 / N 405684	AMBER	O_2 considered erecting a new Greenfield structure at this location; however, in order for the operator to locate on this tower and obtain their coverage requirements it would require a tower of approximately 20 metres in height to erected. It was deemed that a structure of this height/size would form an obtrusive feature within the local area and impact on the visual amenity of the area as well as on the amenity of nearby residential properties on Boardman Lane. In addition, as the site does not have the benefit of any natural screening, the site would be much more visible than the proposed site on Middleton Road.
4	Greenfield	Middleton Angling Society, off Heywood Old Road, Middleton, Manchester, M24 4QR	E 384343 / N 405804	AMBER	O_2 considered erecting a new Greenfield structure within the grounds of the Reservoir; however, in order for the operator to locate on this tower and obtain their coverage requirements it would require a tower in excess of 20 metres in height to erected. It was deemed that a structure of this height/size would form an obtrusive feature within the local area and impact on the visual amenity of the area as well as on the amenity of nearby residential properties, especially those located along Middleton Road.



5	Streetworks	Streetworks at Junction of Middleton Road & Kelvin Avenue, Middleton, Manchester, M24 4RA	E 384563 / N 405015	AMBER	The applicant considers that a site at that this location would increase the visual intrusion of the equipment to a much greater degree than the application site would. In addition, a site at this location would have a greater impact on visual amenity on nearby residential dwellings than the proposed site would have.
6	Greenfield	Redundant Motorworld Supermarkets, off Heywood Old Road, Middleton, Manchester, M24 4GL	E 384655 / N 405215	AMBER	This old Car Sales Yard is situated in a low lying parcel of land, close to residential dwellings. Consequently, in order for O_2 to use this location and replicate their current coverage fro the relatively elevated position on Pylon VJ30 a 22.5 metre tower would be required. It is deemed that a tower of this height would greatly impact on the visual amenity of the area as well as on the amenity of nearby residential properties, especially those located along Manchester Old Road and Heywood Old Road.

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

4.0 Reasons for Selecting the Site and Design

Given the makeup of the area and lack of alternative sites, it was established that a Monopole type proposal would be the most suitable solution which could provide coverage to this area of Middleton/Higher Blackley.

The proposed design consists of a 15 metre Monopole Column which will accommodate Telefónica O_2's antenna at the top of the column at a centre line height of approximately 14 metres. The antennas must be located at a centre line height of 15 metres so that they can clear the nearby clutter and provide Telefónica O_2's required coverage to the residential / commercial areas of Middleton / Higher Blackley, as well as coverage on the busy M60 motorway ring-road. Therefore the proposed column design at a height of 15 metres to the top of the structure is the absolute minimum available to the operator that will allow all these criteria to be met.

It should be recognised from the outset that the general cell area is predominantly residential in character and constraint by its topography; hence Telefónica O_2's decision to locate the proposals in a high position to minimise the required height of a monopole and in location which formed a natural break in the residential area.

Every attempt has been made to minimise the visual impact of the scheme by careful siting and design. It is acknowledged that residential properties can be found within the vicinity of the site; however given their orientation within the street scene and its location surrounded by mature trees, it is considered that the proposal would not affect the outlook from any of these properties.

The technical requirements of mobile communication operators such as the applicant are well documented within PPG8 and this policy guidance is clear that telecommunications development may not always reflect immediate land uses. PPG8 recognises that it is the technical requirements of the telecommunications operator that dictate the height of some proposed installations. However, the operator has kept the height of the column to the absolute minimum that will allow them to clear the adjacent trees.

In address of the appearance of the proposal, it is believed that the scheme takes a form which is sympathetic within the context of its immediate street scene which includes street lighting columns. Aware that some standard mast designs can appear incongruous, it is highlighted that the antennas would be concealed within an in-line cylindrical shroud and would be integral to the upper most section of the pole. It is considered that the column is relatively slender whereby the shroud element is true with the pole. This design is considered to be an appropriate solution and shows the applicants efforts to help mitigate the proposals impact on the visual amenity.

It should be recognised that the use of shrouded antennas would eliminate the large number of bracing components associated with other more prominent and conventional telecommunications installations. Similarly, the applicant has opted to connect the site into the national network via an underground transmission link rather than relying on a transmission dish, which the appellant judged might affect the linear nature of the scheme. It is considered that the slim-line column is an appropriate solution as it is camouflaged in appearance and is of the same height as lighting columns found in the locality.

The proposed equipment cabinets are considered small for a telecommunications development (each measuring less than $2.5m^3$) and will be located alongside the monopole. The equipment cabinet has an appearance similar to other communications and electrical service boxes found in the street scene. The proposed equipment cabinet can be painted to the requirements of the LPA, further reducing its prominence. It is considered that the ground based development will not have any detrimental impact upon the visual amenity of the area and will not even be visible to passing traffic on the A576 Middleton Road.

In light of Telefónica O_2's efforts to design the best solution for this particular site so as to minimise the impact of development on the environment, it is considered that the appearance of a slim-line streetworks column would not seriously impact upon the visual amenity of the area, nor would it form an obtrusive feature in the street scene, particularly as the site is located.

The proposed equipment cabinet can be painted to the requirements of the LPA, further reducing its prominence. It is considered that the ground based development will not have any detrimental impact upon

the visual amenity of the area. The proposed application site is required as a direct replacement for O2's existing installation which is located on a nearby electricity pylon.

The applicant agrees that should this replacement application site be granted consent, they will remove their equipment from Pylon VJ30 together with their ground based equipment within 3 months of the new installation being erected.

It is considered that the proposal before you strikes a good balance between environmental impact and operational considerations. The proposed height and design represents the best compromise between the visual impact of the proposal on the surrounding area and meeting the technical coverage requirement for the site. Taking all matters into account it is considered that the proposal would not appear out of place at the application site. It is considered that the proposal has been sited in a position which respects the character of the cell as a whole and the general setting of the immediate area.

5.0 Planning Policy

5.1 National Policy

National guidance contained within planning policy guidance notes and Governmental circulars have been determined to be material considerations in determining planning appeals. In this instance, it is our opinion that the following advice is material:

PPG 8 – Telecommunications (2001)

PPG8 'Telecommunications is the national planning document offering guidance to local authorities in the formulation of local plan policy and evaluation of telecommunications developments.

Overall aim of PPG8 is to allow for the growth of new and existing telecommunications networks in conjunction with environmental considerations. Paragraph 1 of PPG8 emphasises the Governments' generally positive approach to telecommunications: - *"The Government's policy is to facilitate the growth of new and existing telecommunications systems whilst keeping the environmental impact to a minimum. The Government also has a responsibility for protecting public health."* Paragraph 1, PPG8, 22 August 2001

PPG 8 goes further and states that *"The aim of telecommunications policy is to ensure that people have a choice as to who provides their telecommunication service, a wider range of services from which to choose and equitable access to the latest technologies".* Paragraph 2, PPG8, 22 August 2001

Paragraph 7, advises that each telecommunications system have different antenna types, siting needs and other characteristics. *"Planning Authorities should have regard to any technical constraints on the location and proposed development."*

PPG8 acknowledges the commercial pressures placed of mobile telecommunications systems and that basis of demand for such services, confirming that: - *"These systems are demand-led. Increase in the use of mobile phones has meant that operators are continually expanding their networks to accommodate customer requirements of service and quality. The greatest need for base station sites is usually in built-up areas where there is the greatest density of mobile users, and within a mile or two of the main roads, where the demands on network capacity are greatest."* Paragraph 22, PPG8, 22 August 2001

With reference design PPG8 confirms that operators should be innovative in their design solutions and should attempt to find solutions that minimise potential amenity and intrusion issues, stating that: - "*The telecommunications industry is encouraged to continue to develop innovative design solutions, in terms not only of the structure of masts and antennas but also the materials and colouring. A number of different design solutions are currently available. These include masts designed to look like trees or street furniture, and the redevelopment or restoration of existing properties to incorporate telecommunications apparatus. Authorities may wish to discuss with operators different design and camouflage options in connection with development proposals. Operators are encouraged to provide examples of different design solutions. It should be borne in mind that some designs may not be suitable for future sharing. Where it is agreed that a site is suitable for future mast sharing, it may be appropriate to install a mast specifically designed to facilitate its redevelopment for sharing."* Paragraph 77, PPG8, August 2001

5.2 Code of Best Practice on Mobile Phone Network Development

The Code of Best Practice was published in November 2002 and produced jointly by all Mobile Phone Operators, and representatives of Central and Local Government. It provides clear and practical advice to ensure that delivery of significantly better and more effective communication and consultation between operators, local authorities and local residents.

Paragraph 131 acknowledges that overall mast size increases as a result of mast sharing. Due to the character of the cell area being prominently residential, Telefónica O_2 decided against the use of a larger shareable mast, as it is likely that such a proposal may have had an unacceptable visual impact. It is therefore considered that the use of a 15 metre high, slim-line monopole would eliminate the large number of bracing components associated with other more prominent installation designs such as lattice structures.

Paragraphs 140 - 145 identify general design principles in which camouflaging or disguising equipment is considered materially appropriate. In reducing the environmental and visual impact of a ground based installation the Code of Best Practice promotes the use of simple and uncomplicated designs. Paragraph 148 recognises that *"Masts which have complex designs are more likely to dominate and be in discord with the landscape and have adverse visual impacts."*

Concerning the erection of new ground based masts; paragraph 148 provides examples of where the environmental and visual impact of the mast can be greatly reduced. Paragraph 148 states:

- *Placing the mast near similar structures. For example, industrial and commercial premises, road signs and lamp posts;*
- *Using simple and unfussy designs. Masts which have complex designs are more likely to dominate and be in discord with the landscape and have adverse visual impacts; and*
- *Appropriate colouring.*

5.3 Local Policy

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that "If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise"

The development plan framework is provided by Policy DC17.1 of the Manchester Unitary Development Plan (UDP). The UDP was adopted by the Council in July 1995.

It is considered that the following polices of the Manchester UDP Plan are applicable: -

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 accordance with Policy DC17.1, the proposed site on Middleton Road has been sited to minimise its impact on the residential amenity. As the proposed coverage requirements for this site are found within a predominantly residential area, it is difficult to find suitable locations that meet with the networks coverage requirements; having a willing site owner; and can be located within an area that will not affect both visual and residential amenity. It is the applicants opinion that the proposed site location on Middleton Road is one of the few locations that meet with these requirements within O_2's permitted search area (please refer to Appendix A).

The Council also require the sharing of existing telecommunications sites to be fully explored and discounted before any operator proceeds with separate new developments. In line with PPG8, Telefónica O_2 UK Limited will use all endeavours to share any existing facilities where this is technically and legally feasibly, unfortunately there are no existing telecommunications installations within the operators search

area (please refer to O_2's permitted search area as shown on the Map in Appendix A). With regards to locating antenna on other building or structures, there are no buildings or structures, which are available to O_2 (that can be considered a vandal free alternative to the operators existing pylon installation) and will provide them with their required coverage to their target area around the Middleton locality. Therefore, it is the applicant's opinion that a site at this location accords with both PPG8 and Policy 17.1 of Manchester City Council's UDP.

6.0 Health & Safety

Recent court cases have confirmed that the *public perception* of health risks can be a material consideration within the land-use planning system. The weight to be attached to this issue has to be determined accordingly in each case by the decision maker. It has been generally held, and widely established at planning appeal, that health concerns are not a sufficient basis alone for withholding planning permission providing it has been demonstrated that the proposed installation will comply with the ICNIRP guidelines.

The most recent government advice regarding mobile telephone technology and health issues is outlined within the revised PPG8 (2001) which states: *"it is the Government's firm view that the planning system is not the appropriate mechanism for determining health safeguards. It remains central government's responsibility to decide what measures are necessary to protect public health. In the Government's view, if a proposed development meets the ICNIRP guidelines for public exposure it should not be necessary for a local planning authority, in processing an application for planning permission or prior approval, to consider further the health aspects and concerns about them."* Paragraph 98, PPG8, 22 August 2001

In this instance, Telefónica O_2 UK Ltd believes that it is not necessary to consider health effects further, as recommended by PPG8. Telefónica O_2 UK Ltd is committed to ensuring that all new and existing installations are ICNIRP compliant, and consequently it is considered that there is no basis for this application to be refused on health and safety grounds or for reasons relating to public concerns about health and safety. An ICNIRP compliance certificate is enclosed in appendix C. If required, additional information regarding the operation of mobile telephone base stations and health and safety considerations can be provided.

7.0 Summary

To summarise the case in favour of the proposals the following points are of relevance:

- With specific regard to telecommunications development, the appellants considers that the proposal accords fully with PPG 8, the Code of Best Practice; Manchester City Council's Unitary Development Plan and Supplementary Planning Guidance in relation to Telecommunications developments;
- O_2 requires this installation as a replacement site for their current installation on Pylon VJ30 which cannot current deliver the operators network obligations to their customers;
- Site selection was progressed in accordance with the appellants licence obligations, advice in PPG 8 and the Code of Best Practice and represents the least environmentally intrusive, technically suitable, available option;
- In accordance with PPG8, the operator will always investigate sharing existing telecommunications structures where it is technically and legally feasible, unfortunately within Telefónica O_2's permitted search area there are no existing telecommunication structures or existing structures for the operator to share;
- Existing buildings and high structures have been investigated, although there were no appropriate buildings or structures within the vicinity that would provide the operator with their coverage requirements within their coverage area;
- It is of note that the height of the mast (at 15 metres to the top) has been kept to the absolute operational minimum to clear the immediate buildings and provide adequate 2G/3G coverage to the cell area;
- It is considered that the use of a 15 metre high, slim-line monopole would eliminate the large number of bracing components associated with other more prominent and conventional telecommunications proposals;
- The location of the installation is deemed to be the most suitable location for a telecommunications development within the operators search area;

- Telefónica O_2 have opted to connect the site into the national network via an underground link rather than rely on a transmission dish, which Telefónica O_2's judged might affect the linear nature of the design and increase its prominence;

APPENDIX A – DISCOUNTED OPTIONS & SEARCH AREA
PROPOSED INSTALLATION OF A 15 METRE SLIM-LINE COLUMN, 3 ANTENNAS, TWO EQUIPMENT CABINETS AND DEVELOPMENT ANCILLARY THERETO LOCATED ON A GRASS VERGE OFF MIDDLETON ROAD (OPPOSITE THE THREE ARROWS PUBLIC HOUSE), HIGHER BLACKLEY, MANCHESTER, M24 4GY

Appendix A includes a map that indicates the extent of the area in which an installation is required for Telefónica O_2 UK Ltd. The search area within which an installation needs to be established in order to meet the coverage requirement is constrained by the location and extent of the coverage provided by existing installations in the surrounding area. An installation located outside of this search area would not allow Telefónica O_2 UK Ltd to provide the desired level of coverage and would therefore not adequately fill the current coverage gap. The sites considered in section 3.4 above are also plotted on the attached map.

O2 Ref: 41447 Rhodes Replacement - Discounted Options/Search Area



Option	Address
1	Existing O2 installation on Pylon VJ30, Land to the rear of Baguley Crescent, Middleton, Manchester, M24 4RP
2	Rhodes Green Farm, Boardman Lane, Middleton, Manchester, M24 4SP
3	Bradley Hall Farm, off Boardman Lane, Middleton, Manchester, M24 4SL
4	Middleton Angling Society, off Heywood Old Road, Middleton, Manchester, M24 4QR
5	Streetworks at Junction of Middleton Road & Kelvin Avenue, Middleton, Manchester, M24
6	Redundant Motorworld Supermarkets, off Heywood Old Road, Middleton, Manchester, M24

●	Grass Verge off Middleton Road (opposite the Three Arrows Public House), Higher Blackley, Manchester, M24 4GY (Application Site)
⬭	Search Area

APPENDIX B – TECHNICAL JUSTIFICATION AND CELL PLOTS
PROPOSED INSTALLATION OF A 15 METRE SLIM-LINE COLUMN, 3 ANTENNAS, TWO EQUIPMENT CABINETS AND DEVELOPMENT ANCILLARY THERETO LOCATED ON A GRASS VERGE OFF MIDDLETON ROAD (OPPOSITE THE THREE ARROWS PUBLIC HOUSE), HIGHER BLACKLEY, MANCHESTER, M24 4GY

As indicated in the supporting statement Appendix B contains coverage plots illustrating the operational affect of and the technical requirement for the proposed installation.

Technical Justification

Site details	
Cell ref:	041477 RHODES REPLACEMENT
Site Name:	GRASS VERGE OFF MIDDLETON ROAD (Three Arrows Public House)
Site address:	MIDDLETON ROAD
	MIDDLETON
	GREATER MANCHESTER
	M24 4GY
National Grid Coordinates	384246 / 404717
Height to top of Antenna	15 M
Frequency	890 – 960 MHz & 1935 – 2135MHz

This summary provides a technical justification for the proposed telecommunications installation at RHODES REPLACEMENT. It is accompanied by radio coverage plots which illustrate the need for the site.

Site 041477, RHODES REPLACEMENT, is designed to replace an existing site, RHODES 17716, currently located on Pylon VJ30, which has been subject to intense vandalism. The Pylon Site has been off air several times due to the antenna feeder cables having been stolen and has caused severe disruption to O2's network. An alternative location has been sourced which will give an equal level of coverage to O2 customers, so that they can make and retain calls in the cell area. It is to cover the residential and retail areas around Heaton Park, together with the M60 and A576. (See Map 1.)

A clear line of sight to the intended coverage area is essential, and objects such as trees, buildings etc. degrade the signal an appreciable amount and can cause poor network operation. To avoid this loss of signal, care must be taken to place the antennae above the average "clutter" height, and make sure that the antennae are clear from very close obstructions. The attached photograph's (photograph 1 and 2) illustrate the type of terrain which the site needs to clear, to prevent severe degradation of the radio signal, which is predominantly residential and retail buildings, together with mature trees.

The attached radio coverage plots are produced using computer modelling software and are intended to give as accurate a representation as possible of existing and proposed coverage. The model does not take into account specific local features such as individual building heights, trees etc.

The coverage plots show three levels of coverage:

White – no coverage.

Blue – outdoor coverage only.

Green – in-building coverage available.

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Plot 1 – Existing coverage without 041477.

This plot shows the coverage from our existing sites without the proposed site 041477. It can clearly be seen that there are areas without an acceptable level of coverage.

Plot 2 – Proposed coverage from 041477 in isolation.

This plot is provided to show the coverage that would be achieved from the proposed installation, at the required height, in isolation so that this can be readily appreciated.

Plot 3 – Proposed Coverage with 041477 in place.

This plot includes the coverage from our existing sites with proposed site 041477 in place. This site would provide service in the required area. Existing sites are indicated on the plot diagram to demonstrate how the proposed site relates to them. The diagrams illustrate the area over which the best level of coverage (in-building, shown in green) would be available, with a lower level of service (outdoor, shown in blue) available over a wider area.

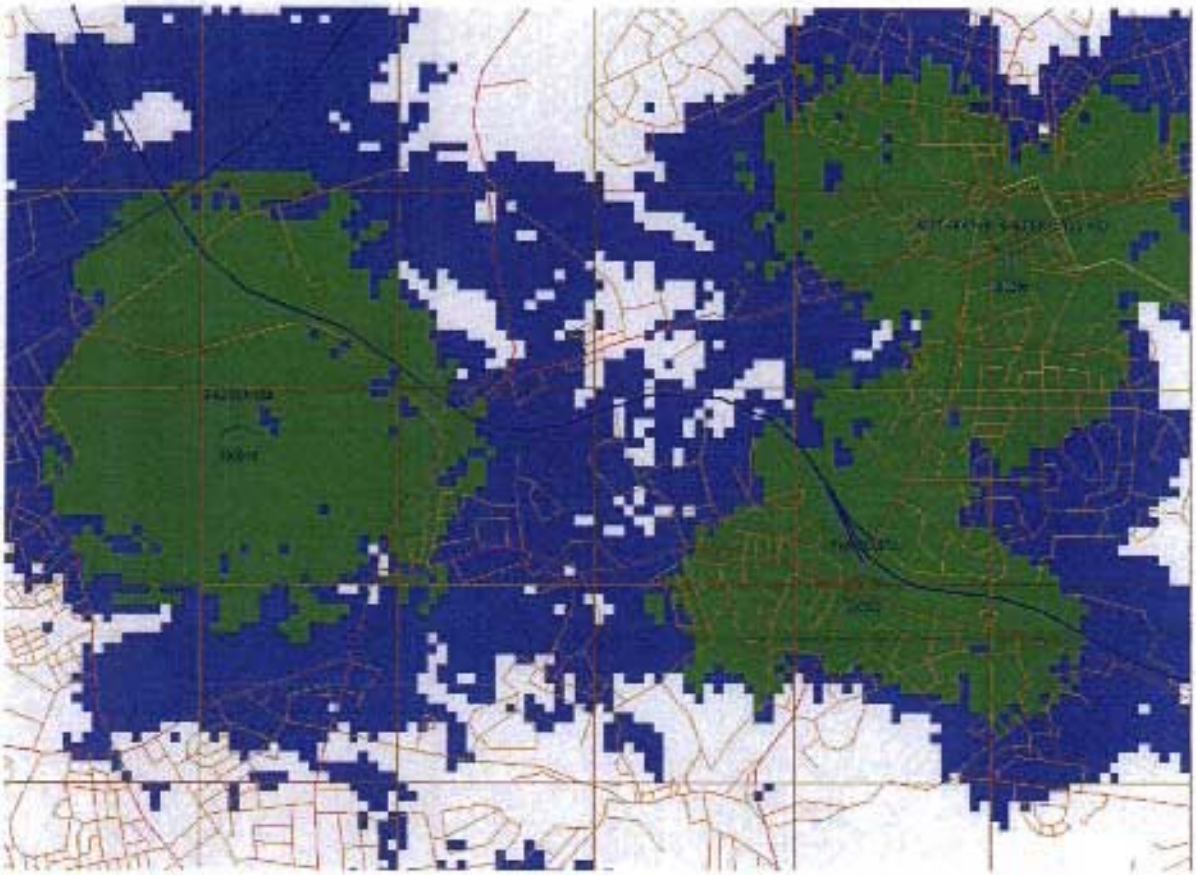
The coverage plots show that the proposed installation is essential to remedy the shortfall in coverage previously provided by site 17716. We consider that the information provided in this technical justification illustrates the importance of the proposed new site, in maintaining service to our customers in this area.

If you require any further information or would like to discuss the above justification please do not hesitate to contact the Acquisition & Planning consultant who has submitted this application.

RICHARD FITTON
SENIOR RADIO ENGINEER
25/09/2008

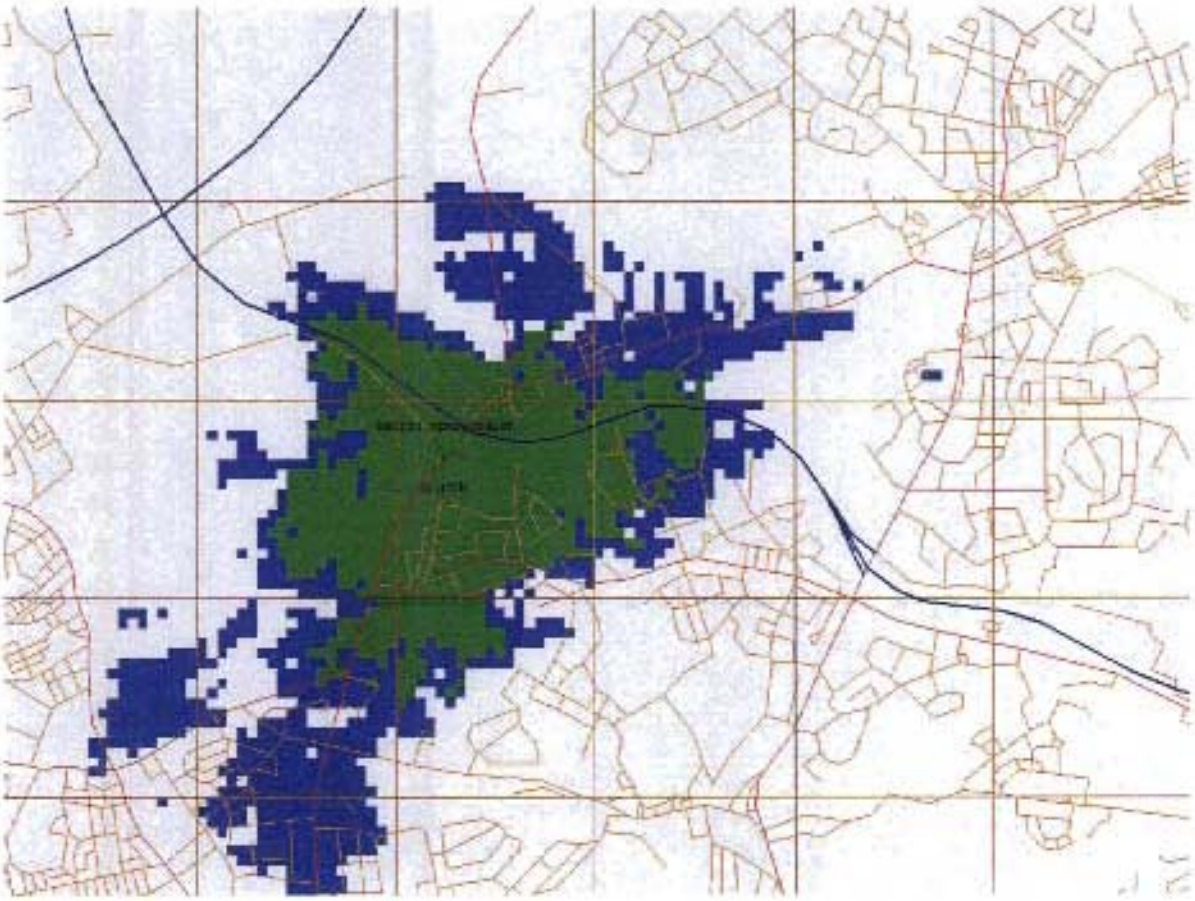
Plot 1 - Existing coverage plot without 041477.

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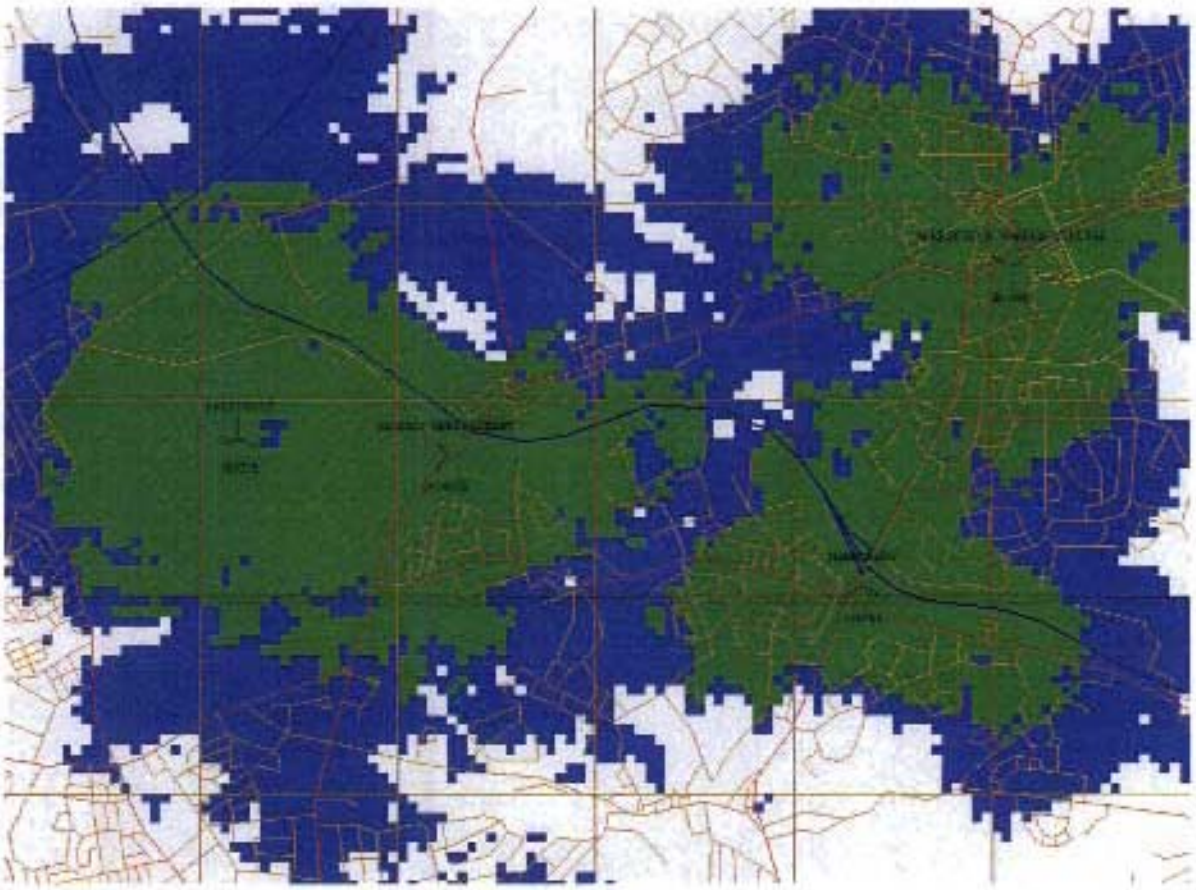
Plot 2 – Proposed coverage from 041477 in isolation.

Site details	
Cell ref:	041477 RHODES REPLACEMENT
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Plot 3 - Proposed coverage with 041477 in place.

Site details	
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MAP 1

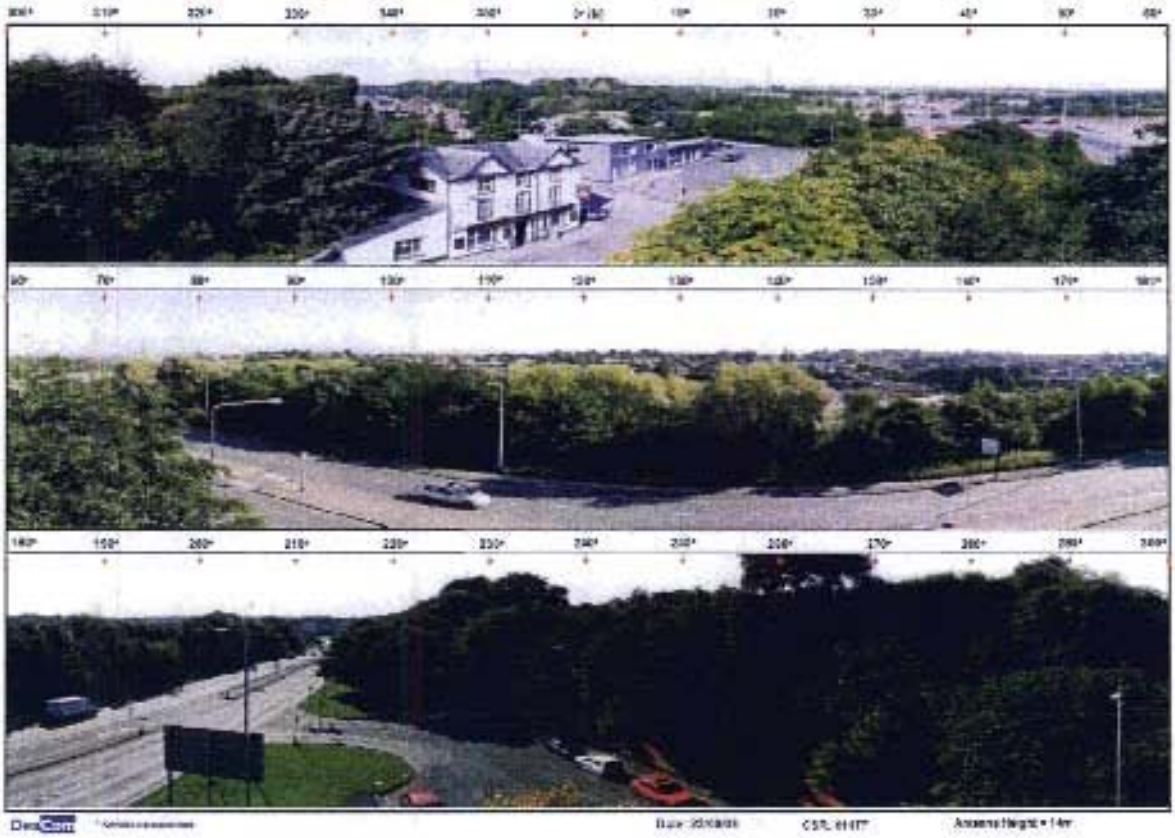


PHOTOGRAPH 1



Site details	
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Photograph 2



APPENDIX C – ICNIRP COMPLIANCE STATEMENT
PROPOSED INSTALLATION OF A 15 METRE SLIM-LINE COLUMN, 3 ANTENNAS, TWO EQUIPMENT CABINETS AND DEVELOPMENT ANCILLARY THERETO LOCATED ON A GRASS VERGE OFF MIDDLETON ROAD (OPPOSITE THE THREE ARROWS PUBLIC HOUSE), HIGHER BLACKLEY, MANCHESTER, M24 4GY

Appendix C contains the ICNIRP Certificate relating to the proposals.

As indicated in the supporting statement national planning policy guidance note PPG8 offers advice to Local Planning Authorities in the determination of telecommunications proposals and the formulation of local plan policies. With reference to health and safety issues PPG8 confirms that the recommendations of the Stewart Report (Published in May 2000) should be adopted in the evaluation of telecommunications developments.

In relation to the increased public perception of risk PPG8 offers the following guidance:

"However, it is the Government's firm view that the planning system is not the place for determining health safeguards. It remains central Government's responsibility to decide what measures are necessary to protect public health. In the Government's view, if a proposed mobile phone base station meets the ICNIRP guidelines for public exposure it should not be necessary for a local planning authority, in processing an application for planning permission or prior approval, to consider further the health aspects and concerns about them." Paragraph 98, PPG8, DTLR

Declaration of Conformity with ICNIRP Public Exposure Guidelines ("ICNIRP Declaration")

Telefónica O_2 (UK) Limited
260 Bath Road
Slough
SL1 4DX

Certifies that the proposed equipment and installation as detailed in the attached Licence Notification at:

Cell Reference: 41477 Rhodes Replacement

Site Address: Grass Verge off Middleton Road (outside Three Arrows Public House), Middleton, Manchester, M24 4GY

is designed to be in full compliance with the requirements of the radio frequency (RF) public exposure guidelines of the International Commission on Non-Ionising Radiation Protection (ICNIRP), as expressed in EU Council recommendation of 12 July 1999 * "on the limitation of exposure of the general public to electromagnetic fields (0 Hz to 300 GHz)".

* Reference: 1999/519/EC

Date: 24th September 2008

Signed:

Name: Richard Fitton

Position: Senior Radio Planner