

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	York House	Site Address:	York House, York Street, Manchester, Greater Manchester, M2 3BB
National Grid Reference:	E 384129 N 398222		
Site Ref Number:	CS 12596531	Site Type: ¹	Macro

2. Pre Application Check List

Site Selection (for New Sites only)

(Would not generally apply to upgrades/alterations to existing site including redevelopment or replacement of an existing site to facilitate an upgrade or sharing with another operator)

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?		No
If no explain why: The industry site database was considered to be a more up to date source.		
Were industry site databases checked for suitable sites by the operator:	Yes	
If no explain why: N/A		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	Yes
Date of pre-application contact:	25 July 2025
Name of contact:	Jack Naven
Summary of outcome/Main issues raised:	
A pre-application consultation letter was issued to the local planning authority detailing the proposed works. Planning officer, Jack Naven, responded on 6 th August 2025 advising that photomontages would be required to support the subsequent application to help assess the potential visual impact of the scheme. Specific focus was placed on the potential visibility of the 2no proposed replacement antennas and new freestanding frame on the northwestern	

¹ Macro or Micro

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elevation. It was agreed between the applicant and the planning officer that two montage images along Fountain Street would be sufficient and specific viewpoints were agreed. These photomontages have been submitted as part of this application.

Conversely, it was also clarified that the 4no replacement antennas on the southwestern and southeastern elevations would unlikely raise concerns given that this equipment would be in the form of straightforward equipment swaps, whereby there is minimal visual change.

Annual area wide information to planning authority

Has annual area wide information been provided?	No
If no explain why:	
<p>Cornerstones commercial relationship with VodafoneThree has changed, effectively increasing our independence to work with other companies in the deployment of mobile infrastructure. It means we no longer have visibility of VodafoneThree's full update plan. However, Cornerstone is fully committed to working closely with Local Planning Authorities and following best practice guidance.</p>	
Summary issues raised: N/A	

Community Consultation

Rating of Site under Traffic Light Model:	Amber
Outline of consultation carried out:	
<p>Pre-application consultation letters were issued on 25 July 2025 to local ward councillors Marcus Johns, Joan Davies & Anthony McCaul as well local MP Lucy Powell.</p>	
Summary of outcome/main issues raised (include copies of relevant correspondence):	
<p>At the time of submission no specific comments have been raised in regard to the proposal.</p>	

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School/College

<p>Location of site in relation to school/college (include name of school/college):</p> <p>Abbey College Manchester, 5-7 Cheapside, Manchester M2 4WG (approx. 235m northwest of site)</p>
<p>Outline of consultation carried out with school/college (include evidence of consultation):</p> <p>Pre-application consultation letters were issued on 25 July 2025.</p>
<p>Summary of outcome/main issues raised (include copies of main correspondence):</p> <p>At the time of submission no specific comments have been raised in regard to the proposal.</p>

Civil Aviation Authority/Secretary of State for Defence or the operator of the civil safeguarding area or defence safeguarding area notification (only required for an application for prior approval)

Will the proposed development be on a civil safeguarding area or a defence safeguarding area?		No
Has the Civil Aviation Authority/Secretary of State for Defence/operator of the civil safeguarding area or defence safeguarding area been notified?		No
<p>Details of response:</p> <p>N/A</p>		

Developer's Notice

Copy of Developer's Notice enclosed?		No
Date served:	This is a full planning application. An Article 13 notice has been issued accordingly.	

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3. Proposed Development

The proposed site:

Background Information

Cornerstone is the UK's leading mobile infrastructure services company. Cornerstone acquire, manage and own over 20,000 sites and are committed to enabling best in class mobile connectivity for over half of all the country's mobile customers. Cornerstone oversee works on behalf of telecommunications providers and wherever possible aim to:

- promote shared infrastructure;
- maximise opportunities to consolidate the number of base stations; and
- significantly reduce the environmental impact of network development.

Cornerstone are in the process of improving their service provision and have identified an existing site that is suitable for an equipment upgrade on behalf of VodafoneThree Limited. As part of the operator's continued network improvement program, there is a specific requirement for a radio base station upgrade at this location to replace existing equipment with the latest technologies, which will improve existing coverage provisions for better signal strength, capacity and speed. Mobiles can only work with a network of base stations in place where people want to use their mobile phones or other wireless devices. Without base stations, the mobile phones and other devices we rely on simply won't work and upgrade works are necessary to ensure that old equipment and apparatus is replaced with newer versions that will cater for current and future network demands. These radio base stations are essential to ensure that operators can meet the ever-growing demand on their networks and continue providing the services required for customers to use their devices as intended, whenever they want and wherever they are. Without this upgrade, there will be insufficient coverage and capacity, leading to buffering, dropped calls, and an overall unreliable service in the area, ultimately creating a gap in network provision. This aligns with the operator's code licence obligations to provide high quality coverage to its customers around the UK.

In addition to this, the new merger between Vodafone Limited and Hutchison 3G UK Limited will focus on delivering a "5G Standalone" network to 99.95% of the population by 2034 in line with their agreed promises to Ofcom. The 'standalone' aspect differs from the usual 5G networks insofar as separate networks are created to each handle phone calls and data traffic respectively. In providing a standalone network alongside the usual 5G network, this helps to significantly reduce latency for all mobile users as there is more capacity to handle the digital connectivity demand. This in turn reduces the risk of dropped calls and download buffering for end users.

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To deliver these objectives, it is therefore imperative that adequate infrastructure is in situ to facilitate these technological improvements. In practical terms this may involve introducing new equipment on existing base stations as well as the identification of new sites in circumstances where existing infrastructure is not capable of achieving the necessary capacity levels. The application submitted herein will play a vital role in preparing the infrastructure network to support this national strategy.

The NPPF and Code of Practice guidelines advise a sequential approach to site selection whereby operators are encouraged to upgrade existing base stations wherever possible before exploring alternative site options for new installations. This approach seeks to prevent undue site proliferation, which has been achieved in this instance as an existing site has been identified as requiring an upgrade meaning a new site is not needed to satisfy coverage objectives.

3G (and eventually 2G) will be switched off by the operators in order to repurpose these radio frequencies for faster and more energy-efficient 4G and 5G services. 3G is primarily used for mobile data services. It is being switched off first because it has already largely been superseded by 4G, hence the increased importance of providing the latest 4G and new 5G services provisions in areas where there is no such coverage. 3G has already been switched off by VodafoneThree and EE in early 2024. Telefónica began switching off its 3G services in April 2025 and is continuing the process across its network. As a result, it is imperative that operators build resilience into their networks.

5G service provision is not just about coverage, it is also about capacity through the many layers of technology that the operator provides to their customers to deliver a better-quality experience, greater data speed upload and download, as opposed to waiting for a file to download or a map to get from A to B (on the network) due to congestion.

Public Benefits

High quality coverage has become an essential part of society that benefits residents, businesses and visitors within a local community. In today's society the utility provisions for digital communications are an integral part of everyday life as it facilitates a variety of tasks such as phone calls, access to the internet, map navigation, video/music streaming, gaming, online banking and ecommerce. Virtual meetings can also be held with doctors, banking advisors, colleagues and other entities, which have proved necessary as a result of the global pandemic. Consequently, the proposal for telecommunications development submitted herein will contribute to the development and growth of the local area as part of the national strategy. The UK Government recognises the vital role of telecommunications as part of critical national infrastructure and the

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importance of ensuring these networks are resilient to prevent significant national risks. This underpins the high value of public benefits that would be provided as a result of this application.

In order to achieve these aims it is necessary for existing infrastructure to be upgraded with the latest equipment and technologies to ensure the robustness of each base station. In some instances where there is a significant shortfall in the network the applicant will also explore opportunities for new sites to fulfil network requirements. This overall strategy allows for greater improvements to the service provided as it can:

1. Improve the size of coverage area targeted;
2. Increase signal strength which results in faster speeds; and
3. Maximises capacity to handle ever-increasing volumes of data traffic throughout the day.

It is evident that mobile phone usage has grown exponentially over recent years as more than 90% of the population now own a mobile phone. Customers expect to be able to use their mobile phones and tablets in all locations as these devices have become intrinsic to our personal and professional lives. UK operators are continuously trying to improve their network infrastructure in order to adapt to the changing environment and keep up with customer demands. The consequences of the global pandemic also led to an increase in home-based working which highlighted the inadequacies of coverage provisions in non-urbanised areas where improvements are much needed. As part of the applicant's ongoing network programme, there is a requirement for infrastructure improvements in this area, which experiences a large volume of data traffic. The proposed works will also help towards futureproofing the network to reduce the frequency of works required at the site. Further technical justification can be found later in this statement.

Sustainability

Following COP26 there is a greater emphasis on considering the effects of future developments on sustainability and climate change. This is a material consideration for local planning authorities, and it is therefore essential to highlight the positive effects of telecommunications development on such environmental matters. Ongoing network improvements will contribute to several industries to help mitigate climate change such as healthcare, manufacturing, agriculture, transport and energy to reduce their environmental footprints. For instance, there are innovative technologies being explored that can allow greater agricultural monitoring that collects data to help create more efficient farming strategies. In a general sense a greater efficiency can reduce the potential overconsumption of energy and resources in a variety of aspects, which will contribute to the overall reduction of carbon emissions.

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Furthermore, mobile operators are also making efforts to use renewable energy in their operations with a global ambition of reaching net zero emissions by 2050. Each individual code operator has set their own goals and business models for low carbon emissions to target innovative ways to reduce the dependency on fossil fuels. Such initiatives include adoption of zero carbon vehicles, increase the use of renewable energy, reduction of single-use plastic and other active engagement with suppliers and customers to reduce their overall footprint.

Proposed Site and Surrounding Area

The application site is located at York House, York Street, and is a building of 11 storeys used for commercial purposes. The host building is not listed but lies within the Upper King Street Conservation Area and is in proximity to other listed building such as the Grade II* Royal Bank of Scotland (to the southeast) and the Grade II* Estate Exchange (to the northwest). The site accommodates an existing base station which hosts multiple licensed operators and has been in situ for some time. Most existing antennas are face-mounted around the building elevations though there are telecommunications equipment positioned on the rooftop as well. The base station is an established feature within the surrounding area.



The wider surrounding area comprises predominantly of office space as well as other urban uses such as retail and food/drink establishments, which is owed to the site's central location within Manchester City Centre. The host property and surrounding buildings are relatively tall but with slight height variations, thus creating a unique roofscape that is not readily visible from ground level views. The proximity and height of these adjacent buildings provides a degree of visual

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screening along the neighbouring road networks towards the telecommunications equipment that aids their assimilation into the surrounding area as a result. A high level of footfall is experienced throughout the day in this area, which is further signified by the proximity of popular thoroughfares such as Market Street and the nearby transport routes for tram, bus and train travel.

This site therefore serves as an important base station within the operator's wider infrastructure network due to the high volumes of phone and data traffic experienced throughout the day. As technological advancements continue to develop, it becomes necessary to deploy the latest technologies on existing base stations to improve service provisions that can handle current and future network demands, as well as helping to build each site's resilience and robustness. The proposed upgrade subject to this application therefore forms an integral part of the applicant's strategic objectives.

Enclose map showing the cell centre and adjoining cells if appropriate:

N/A

Type of Structure (e.g. tower, mast, etc):	Antenna poles
Description:	
Removal and replacement of 6no antennas (overall antenna height 41.7m AGL), installation of 1no new 300mm dish and other associated ancillary works thereto.	
Associated ancillary works thereto including: <ul style="list-style-type: none"> Removal of 9no existing RRUs to be replaced with 15no new RRUs Internal equipment cabin upgrade 	
Overall Height:	41.7 Metres
Height of existing building (where applicable):	39.0 Metres
Equipment Housing: N/A – internal upgrade only	
Materials (as applicable):	
Tower/mast etc – type of material and external colour:	Steel – RAL 7035
Equipment housing – type of material and external colour:	N/A – internal upgrade only

Reasons for choice of design, making reference to pre-application responses:

General Overview

The applicant has sought to cause as little impact on the visual amenity of the area as possible whilst also ensuring that sufficient coverage requirements are

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achieved. A further explanation of the application's technical justification is explained in a later section of this statement however, it should be acknowledged from the offset that the least amount of equipment and the smallest scale possible has been proposed to achieve the optimum coverage objectives. The resulting benefits will improve existing mobile coverage through stronger and faster connectivity and helps to prevent the need for additional sites in close proximity to futureproof the network for customer demands.

Moreover, the proposed height of the antennas is the lowest possible height to ensure correct signal conveyance whereby a reduction in height may impact on the site's functionality as well as health and safety in relation to ICNIRP compliance. It should be emphasised that intervening elements such as buildings and trees can weaken signal strength meaning that a height increase is often necessary to counter these limitations. 4G signals by their very nature (as they carry high data rates) do not penetrate over long distances (just a few hundred metres), and 5G even less so. Depending on the topography of the land, building clutter and vegetation including trees in the area these factors can further reduce radio signal effectiveness. Since these technologies operate at higher frequencies where attenuation of the radio signal is naturally higher and the effect of clutter are greater, it can often lead to the requirement for higher structures to achieve the same coverage footprint.

The operator's general practice will always endeavour to propose the least impactful design possible to sufficiently achieve the desired coverage levels and it should be recognised that any reduction in height or equipment would significantly compromise the site's effectiveness within the network. There are no alternative design solutions available with the required technologies meaning the proposed scheme is the least visually intrusive design for the site's upgrade.

As the applications relates to an existing base station it is not necessary to outline alternative locations however, it should be noted that if an upgrade cannot be progressed at this location a new additional base station within proximity may be required to fulfil technical objectives. This is a mature network which has grown and each site functions in conjunction with surrounding sites to provide blanket coverage. In circumstances when an upgrade cannot be achieved and a replacement site is required, this can lead to technical implications where coverage issues can occur. Consequently, such upgrades can be influential within the context of the wider base station network as it can help negate the need for introducing additional sites in the area to satisfy current and future demands.

The existing base station was deemed acceptable in its inception meaning that no concerns were raised by the local planning authority in relation to its location

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within the immediate area and any associated sensitive assets. Though it is recognised that changes to a telecommunications site will to a degree be recognisable in any given environment, the visibility of equipment does not automatically lead to detrimental harm as each site must be assessed on its own merits and balanced against the public benefits to be provided in accordance with national planning policy. In this respect significant weight should be given to improving existing coverage in recognition of the government's commitment to this rollout, which will result in socioeconomic improvements for the local community. Digital connectivity is an essential utility provider in today's society and a high-quality service must be provided by the operators in accordance with license obligations. Within the local area, the application site is an established base station, which sets precedence for telecommunications development in principle at this location, and this is further evidenced by the presence of other licensed operators.

Siting and Appearance

To maintain the overall appearance of the existing site, the applicant has adopted a minimalistic approach to utilise existing apparatus as much as possible, which is demonstrated in the proposed design as 4no proposed antennas will be positioned in the same locations as their counterparts to be removed on the southwestern and southeastern elevations respectively. In these instances the existing support structures will be reused and the visual appearance of these sections would thus remain similar to the present context. The applicant does not consider these antennas to be of particular concern, which was echoed in the pre-application feedback that was received. Moreover, this element of the proposed development would otherwise constitute permitted development in its own right without requiring prior approval under Part 16 of the General Permitted Development Order legislation (as amended).

As such, the core area of focus relates to the 2no proposed antennas located on the northwestern elevation. In this instance, it is not possible to reuse the existing wall-mounted structures as a minor height increase is required to allow for correct signal propagation and to also ensure ICNIRP compliance. Consequently, a new freestanding frame is proposed on the rooftop to accommodate the 2no new replacement antennas. It should be reiterated that this proposed change is a technical necessity as the retention of wall-mounted locations on this elevation would impact the proper functionality of the replacement antennas. Within this technical constraint the applicant has sought to position the replacement antennas at the lowest possible height whilst also ensuring there is a clear line of sight towards the desired target coverage area.

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The existing wall-mounted pole on the northwestern elevation will subsequently be used to accommodate a proposed 300mm dish, which is essential to ensure that the network is linked together to allow seamless transmission of connectivity from one mast to another. In order to communicate with each other, transmission dishes must have a clear line of sight and be above surrounding natural or built form, otherwise the signal will be disrupted. The proposed dish has a relatively small profile and is thus capable of assimilating into the roofscape.

Overall, this design layout strikes a balance between the site's technical requirements and visual amenity aspects as the antennas will be positioned in similar locations to the existing equipment across the rooftop. The visual transition between the existing and proposed is subsequently minimised and helps to maintain congruity as the extent of change is not to a dramatic degree that would be overly noticeable. As the scheme seeks to replace the same number of antennas and will not introduce additional equipment in this regard, the overall change in appearance is thought to be minimal given the existing context. The applicant considers this change to be barely noticeable to residents and visitors in the local community when taking into account the existing layout at present which is a recognised feature of this landscape.

The overall height of the proposed replacement antennas will be 41.7 metres above ground level (and approximately 2.7 metres above roof level). As explained previously, this height increase is required to ensure correct signal propagation towards the target areas as well as ICNIRP compliance and is the lowest possible height for the proposed technologies. Notably, the proposed height increase will not lead to any additional break in the skyline as the existing equipment cabins on the rooftop will remain the highest features on the building. This context further supports the minimalistic nature of the proposed development and the applicant's efforts to reduce the scale of the scheme as far as practicable within the technical constraints posed.

Taken as a whole, the antennas will be read within a similar air space across the skyline in conjunction with other utilitarian equipment that is found on the roof, and when compared to the existing site at present, the cumulative effects of the proposed equipment is minimal. Consequently, it is thought that visual amenity is not detrimentally impacted by this upgrade scheme but would in fact be maintained as a result of the minor development works. Although the base station is more discernible at a localised level, the simplistic design of the upgrade scheme will mimic a similar visual appearance to the current situation. When read in conjunction with the surrounding built form, the apparatus presents a minor profile that is capable of assimilating into the roofscape. As a result the applicant considers the proposal to be acceptable in regard to its siting and appearance.

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Following on from this, it is recognised that the equipment can be read at height from wider vantage points however the setting of this application site upon a tall building within an area that is highly urban in character should be taken into consideration in the assessment of this application. Additional regard should also be given to the natural eye line of local residents and passers-by as the equipment is located on a rooftop in which visibility would necessitate a bystander to purposefully look upwards. The applicant believes such views would be uncommon and irregular which in turn reduces the risk of visual prominence. As mentioned previously the proposed works will offer a marginal visual change to the existing base station which is not thought to be noticeable from a greater distance. Given that York House is approximately 39 metres in height; the visibility of the base station at ground level is heavily restricted to oblique views for local residents and passers-by.

In addition to this, there are several screening elements along the neighbouring road networks which will further reduce these views in the form of other tall buildings that offer a similar vertical emphasis in the skyline. For passing traffic, these built features will reduce and screen the site's visibility resulting in momentary and infrequent viewpoints only. With specific focus on the 2no replacement antennas on the northwestern elevation, the positioning of such antennas would unlikely result in visibility from vantage points to the east as the equipment would be well screened behind existing built form. A similar conclusion is also drawn for westerly views along York Street and Spring Gardens as the intervening buildings would also screen any potential views of the equipment.

The area of potential visibility is therefore restricted to localised vantage points along Fountain Street in which two photomontages have been produced in agreement with the planning officer following pre-application discussions. The photomontages (inserted below for ease of reference) provide strong evidence of the proposal's congruous capability as the proposed equipment is not easily recognisable from these vantage points. In the case of Montage 1b, the equipment is well hidden from view due to its size, positioning and elevated height on York House. In relation to Montage 2b, there is only a partial view of the proposed equipment and its minor profile would be dwarfed by the size and stature of surrounding built form. From this vantage point, the equipment would be nominally felt when read within the wider streetscape perspective, thus encouraging the development's acceptable and sympathetic nature.

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Image 1a
Existing view from Fountain Street looking North East.



Image 1b
Proposed view from Fountain Street looking North East.



Image 2a
Existing view from Fountain Street, adjacent to the junction with Marble Street looking South West.



Image 2b
Proposed view from Fountain Street, adjacent to the junction with Marble Street looking South West.

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These montages illustrate the application's congruous nature across the skyline meaning its overall prominence is negligible to passing pedestrians and motorists. The inconspicuous nature of the equipment is an integral matter of consideration that should be applied to the assessment of this application given the minor alterations proposed. These arguments should therefore be materially considered in the determination of this submission.

Leading on from this, the proposal is not considered to adversely impact residential amenity as the equipment is situated on the rooftop away from residential windows and other private spaces meaning there is no direct influence on the natural enjoyment of daylight, outlook or privacy for the local community. In relation to environmental conditions such as noise, the immediate surroundings are of a commercial nature and is consistently busy throughout the day. As such, it is not considered that the development would have a noticeable effect on existing noise outputs in this locality.

Additionally, it should also be reiterated that that the application site accommodates an existing base station that is shared by multiple operators, which sets precedence for telecommunications equipment at this location and is also befitting of the surrounding environment. It is also inherently common for telecommunications equipment to be situated on tall buildings which is especially widespread in large towns and big cities. As well as this, the applicant's decision to upgrade an existing site as opposed to identifying a new location is in accordance with planning guidance so as to prevent undue harm to visual amenity and proliferation. It is also important to emphasise the necessity of the proposed upgrade to ensure that old equipment is renewed in line with technological advancements. This allows the base station to operate at its optimal functionality in order to handle current and future network demands.

Furthermore, in relation to sensitive heritage assets, it is recognised that the application site lies within the Upper King Street Conservation Area and in proximity to other listed building. Further information on these assets are addressed in the Heritage Statement section contained herein however, in recognition of these sensitive assets, the applicant has sought to preserve the character and setting of the surrounding area as far as practicable within the parameters of technical constraints. As a licensed code operator, the applicant has a legal obligation to ensure high-quality coverage is accessible throughout the UK in which it is often inevitable for sites to be located within, and in close proximity to, sensitive assets due to their localised nature. In such circumstances a sympathetic design approach is adopted to prevent any significant detrimental harm, which has been evidenced in the proposal submitted herein. When assessing the potential impact of this application in this respect, it is

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therefore imperative to understand the site's importance as a utility provider where the public benefits of the scheme must be fully appreciated. The ongoing 5G rollout will vastly improve digital connectivity in the local area and consequently, considerable weight should be accredited to the merits of this proposal.

Preservation does not mean no change; it specifically means no harm. GPA2 (Historic England's Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning: 2) states that: '*change to heritage assets is inevitable, but it is only harmful when significance is damaged*'. Thus, change is accepted in Historic England's guidance as part of the evolution of the landscape and environment. What matters is whether such change is neutral, harmful, or beneficial to the significance of an asset.

In this respect, the applicant considers the 4no proposed antennas on the southwestern and southeastern elevations to have a neutral effect given that the existing visual appearance of these sections would be preserved and thus, there is no evidence of additional harm that would be created. The applicant also considers the 2no proposed antennas on the northwestern elevation to have a similar neutral effect as the submitted photomontages demonstrates a lack of equipment visibility, that would in turn be of negligible significance to the character and setting of the surrounding conservation area. To an extent, it could be further argued that the re-positioning of antennas on top of the roof brings the equipment into a less visible space when compared to its current wall-mounted positions on the building façade. Overall, the proposed design is demonstrably sympathetic towards the setting of nearby listed buildings and the character of the conservation area as the equipment would not be visually prominent to an extent that would detract from the natural views and historical qualities of these assets and designations, and nor would it dramatically differ from the present site context that has been deemed acceptable.

In conclusion the proposed design is considered to be respectful of the surrounding elements and does not cause detrimental harm to the visual amenity of the immediate environment. The siting and appearance of this proposal is therefore within the boundaries of acceptability as it will cause minimal interruption to the current landscape and is in line with national planning policy to utilise existing sites and buildings. When taking into account the existing precedence for telecommunications equipment, the proposed upgrade displays a level of consistency with the current site which results in a similar extent of visual impact as the equipment presently in situ. Therefore, the applicant strongly believes the scheme demonstrates a sympathetic design that would not

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detract from the setting and character of the surrounding area and the proposed works are capable of being absorbed into the wider landscape.

Summary

A requirement for improved network coverage has been identified in this area. This is an upgrade of an existing site which will provide essential services for residents and businesses within the immediate vicinity. It was therefore not required to explore alternative sites in line with National Planning Policy. In today's society there is a strong reliance on connected services which demonstrates a necessity for high-speed coverage in all areas of the UK. The effects of the global pandemic have also led to increased home-working where current network infrastructure is in much need of improvement.

The proposed works have been designed sensitively in consideration for the character and appearance of the surrounding area in which the least impactful scheme has been proposed to minimise the visual impact of the proposal whilst also ensuring the coverage objectives can still be achieved. A reduction in equipment or scale would therefore substantially impact the quality of signal provided and the overall functionality of the site.

The applicant has also demonstrated efforts to respect the existing visual amenity of the surrounding area in which the proposal is capable of preserving the local character and setting. Additional regard has also been given to the proximity of any historical and natural assets to ensure these are duly protected as far as practicable.

The site will be valuable in the Government's desire for high-speed connectivity and ensuring its accessibility throughout the UK wherever and whenever required. It is considered that the proposal complies with national and local policy. It is therefore considered that the public benefits provided by the proposed upgrade would outweigh the minimal visual change in the appearance of this site.

The applicant considers the proposal to be an acceptable development which should be viewed favourably by the local planning authority.

Health and Safety - including ICNIRP compliance

All Cornerstone installations are designed to be fully compliant with the public exposure guidelines established by the International Commission on Non-Ionizing Radiation Protection (ICNIRP). These guidelines have the support of UK Government, the European Union and they also have the formal backing of the

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World Health Organisation. A certificate of ICNIRP compliance has been included with this application.

4. Technical Justification

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

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

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

The consequences of the global pandemic have also highlighted the inadequate nature of infrastructure in suburban and rural areas in particular as a result of increased home-working and e-learning for school. Existing base stations have struggled to handle increased data traffic demands which demonstrates the importance of improving digital connectivity in all parts of the country. In addition to improving signal strength, speed and capacity for current demands the proposed works will also aid in futureproofing the quality of the network through its greater robustness. As a licensed code operator, the applicant has a legal obligation to ensure a high-quality service is accessible to the public throughout the UK as it contributes positively towards the socioeconomic development at local and national levels. This is particularly apparent in densely populated areas that experience high levels of footfall on a daily basis. In today's climate the existing network has allowed users to video stream at much faster data speeds allowing the integration of smart phones into wider uses than previous generations and continued improvements are necessary to cater current and future network demands. The inevitable consequence of technological advancements means that customers expect tasks to become even quicker and simpler.

Coverage: The licence granted to mobile operators demand strict coverage objectives to be met nationwide. It is essential that the benefits of mobile phones are available across the population. Mobile networks are constantly reviewed to ensure that there is adequate coverage and capacity to meet customer demands. In the current environment there is an expectation for signal coverage to be available at home, in the workplace, while shopping, enjoying leisure activities or in transit.

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Quality: In order to ensure there is sufficient coverage within buildings such as homes, shops, offices etc. the radio signal has to be of adequate strength to penetrate walls. In urban and suburban areas a dense network of base stations is therefore required, which are sometimes less than 1 km apart. The improvement of existing signal in this area will encourage economic advancement in accordance with national policy which seeks to develop and grow connected environments.

Capacity: The upgrade of telecommunications masts across the country is an inevitable consequence of the continued growth of mobile phone usage. More sites are required to address the increasing traffic demands of each mobile user for tasks such as video/music streaming. For instance, each cell or base station is limited to handling a finite number of calls meaning that areas of high usage will require additional cells to meet network demands and avoid congestion.

To keep up with growing demand the operators need to upgrade existing base stations and build new base stations to improve the coverage and capacity of the network so as to improve robustness. Capacity is the maximum data or calls that can be processed by a base station. When capacity is exceeded, users may experience slower internet speeds, dropped calls, or difficulty connecting to the network.

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 antennas must reach a sufficient height above surrounding buildings and trees. In more rural locations the undulating topographies will also have detrimental implications on signal propagation which require mitigation. The proposed development must also be in a position to provide strong radio coverage to the target area that can also be received inside buildings. As a result, it is integral that antennas have an unobstructed view towards the wider target area as it optimises the quality of signal.

The radio planning tool identifies deficiencies in the network and predicts the location from which the optimum coverage will be provided. Within these areas existing base stations are selected for an upgrade. The proposed installation subject to this application stems from this process where it is imperative for mobile operators to provide high quality coverage to its customers. This is achieved through the improvement of existing network infrastructure and introduction of new base stations to fill in blank spots.

For these reasons, the proposed upgrade is of paramount necessity which cannot be undervalued and the requirement for this development is fully justified.

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5. Site Selection Process

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

Site Type	Site name and address	National Grid Reference	Reason for not choosing site
N/A			

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

In accordance with the sequential approach to site selection encouraged in national planning policy as well as the Code of Practice for mobile operators, the applicant has identified an existing base station that is suitable for an upgrade. Consequently, it was not necessary to explore alternative site options.

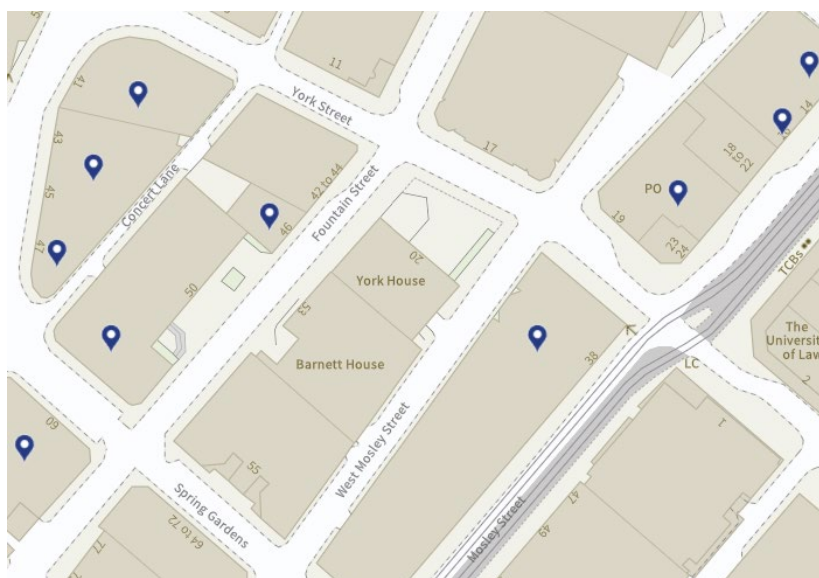
Land use planning designations: N/A

Protected land designations:

Heritage Statement

Listed Buildings:

York House is not a listed building but other heritage assets are located within proximity as shown in the below map taken from Historic England.



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The nearest listed buildings comprise of the Grade II* Estate Exchange (Listing 1200835) to the northwest and the Grade II* Royal Bank of Scotland (Listing 1220165) to the southeast. In both respects the natural views of these listed façades would remain unobstructed as these listed buildings would be viewed within its own localised context. Notwithstanding the already established nature of telecommunications equipment on York House, the equipment is nevertheless in an elevated position whereby there is a degree of visual separation between the equipment and ground level vistas towards the aforementioned listed buildings. This is particularly the case regarding the setting of the Grade II* Royal Bank of Scotland given that there are minimal changes proposed to the southeastern elevation of the application site.

When considering the proposed alterations on the northwestern elevation, it is equally unlikely that the development would impact the setting of the Grade II* Estate Exchange as shown in the below image. The positioning of the listed building along Fountain Street and it's comparably lower building height means that historical views towards this asset would be restricted to direct views immediately outside the heritage asset, as opposed to broader views that could potentially incorporate the upper portions of York House as well, thus establishing the application's ability to preserve the character and setting of this heritage asset.



On this basis, there is little demonstrable evidence that the application would lead to significant detrimental harm towards nearby heritage assets.

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Upper King Street Conservation Area:

It is recognised that the site lies within the Upper King Street Conservation Area as shown in the below map taken from the Council's website. The area comprises of the City's central financial district around the eastern portion of King Street and also includes properties up to Market Street and Mosley Street. A number of properties have undergone redevelopment throughout the years though some buildings retaining characteristics that are typical of the Georgian period. There are notable architectural variations throughout the designation in terms of style and stature.



With specific attention on the application site itself, views towards York House are mainly limited to Fountain Street, York Street and West Mosley Street. As reiterated previously, the proposed development will result in minor changes that would not be prominently visible within the surrounding area along these routes. Consequently, the natural vistas along these highways would be preserved, thus protecting the historical character of the surrounding conservation area. The submitted photomontages in this application provides significant evidence that supports this conclusion and the applicant considers the scheme should be supported as a result.

Additional relevant information (include planning policy and material considerations):

Development Plan Policy Section 70 of the Town and Country Planning Act 1990 as amended requires planning applications and appeals to be determined having regard to the provisions of the Development Plan and other material considerations, and section 38 of the Planning and Compulsory Purchase Act

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2004 requires applications and appeals to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

Local Planning Policy

The following local planning policies are relative and have been considered in the submission of this application. It is argued that the proposal is in accordance with the below policies which promote high-quality connectivity and supports new telecommunications infrastructure when it can be demonstrated that the design and siting of the base station is respectful to its surroundings.

Manchester's Local Development Framework - Core Strategy Development Plan Document (Adopted 11th July 2012)

Policy SP1 Spatial Principles

In accordance with the Council's spatial principles, the proposed development will have a positive impact on the social and economic development of the area which will improve digital communication for residents, local businesses and visitors as a result. The Council is focussed on supporting development that contribute to developing high quality places in which the demanding need for high speed mobile coverage is an important utility in this respect.

Policy EN1 Design Principles and Strategic Character Areas

The proposed development is in line with the seven principles of urban design as identified in national planning guidance. The applicant has taken the existing context and setting of the area into consideration in the design of this proposal, which is considered to be respectful to the current surroundings and is of appropriate scale, height and bulk to preserve visual amenity. This includes additional consideration for the proximity of heritage assets and conservation areas to ensure that schemes are designed sympathetic to protect the character and setting of these sensitive assets. Following on from the previous section the scheme has demonstrated minimal harm when taking into account the current context of the site and is therefore acceptable in regards to matters of siting and appearance.

Policy CC9 Design and Heritage

Policy EN3 Heritage

In relation to heritage assets the applicant recognises the importance of protecting such assets to enhance the character and setting of the surrounding area. The location of base stations in close proximity to such assets are often necessary to fulfil legal obligations to provide high quality coverage to the public however considerable efforts are made to ensure the resultant site is minimalistic and capable of preserving the historical qualities of any given area. In this respect the proposed works subject to this application demonstrates little impact

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on the host building and surrounding area and therefore accords with the principle of this planning policy. The submitted photomontages evidences these points as the proposed alterations would be of a minor scale and does not significantly alter the site's visual appearance from the present context.

Policy DM1 Development Management

In accordance with this policy, the application is appropriate in its siting, layout, scale and form. The site relates to an existing base station that is notably shared with other licensed operators and is an established feature of the area. As explained throughout this application, the proposed works have been minimised as far as practicable to ensure the overall scale remains within the realms of acceptability whilst also ensuring the safe and proper functionality of the site and its utilitarian purpose.

Effects on visual and community amenity are minimal as a result given the site's elevated position on the rooftop of York House, which means it is set away from ground level vistas and also private windows. The surrounding area is of a commercial nature that is busy throughout the day and existing environmental conditions such as noise would thus remain unaffected by the proposed development.

Manchester Digital Strategy 2021-2026

The objectives of this proposal seeks to align with Manchester's vision and strategy for digital connectivity. Within this publicised document there is a recognition that improvements to digital infrastructure will benefit the city as a whole including public, private, voluntary and community organisations as well as local residents.

"This means that it is of fundamental importance to our future success that everyone in Manchester is equipped with the skills and technology to make the most of our rapid digitising world."

In order to help facilitate the digital future envisioned within this Strategy, it is integral that existing mobile network infrastructure is kept up to date with the latest technologies that will maximise the coverage and capacity of base stations within the city. For sites located in urban areas such as this application, there are often capacity issues due to the high levels digital traffic, which often lead to network upgrades being required to cater for current and future demands. These improvements are particularly relevant to the Strategy theme of Digital Places in which a robust infrastructure network is needed to support the ongoing objectives of creating a smart city that can in turn support the other themes that focus on the people, prosperity and sustainable resilience of the city.

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Greater Manchester Combined Authority 2022-2039 (Adopted March 2024)**Policy JP-Strat2: City Centre**

The combined authority strategy identifies the city centre as a core location where investment in development and infrastructure needs to be prioritised. This applies to the provision of high quality digital connectivity to allow fast and smooth interactions between people in both social and economic aspects.

Policy JP-P2: Heritage

In a similar fashion to the local plan policy regarding heritage as outlined above, the application displays a sympathetic approach in which the siting, scale and design is capable of preserving the historical qualities of nearby assets and designations. When considering the acceptability of such developments it is also important to place substantial weight on the public benefits of the proposal to perform a balanced assessment as the resultant perceived harm may be less than substantial. In this particular instance the development relates to an existing base station and the works are of a minor scale that would not dramatically alter the current visual appearance of the site. Therefore, the character and setting of the conservation area and nearby listed buildings can be protected.

Policy JP-C2: Digital Connectivity

The combined authority plan emphasises support for the provision of high quality digital infrastructure, which should be of significant merit to the context of this application. In accordance with this policy the development seeks to deploy the latest generation of mobile technology that will maximise existing coverage and capacity at this base station. The policy also understands that existing network infrastructure must be updated in line with technological advancements and this should carry significant weight in the assessment of this application.

National Planning Policy

The National Planning Policy Framework was revised in December 2024. 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, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner. 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. At a similarly high level, members of the United Nations – including the United Kingdom – have agreed*

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to pursue the 17 Global Goals for Sustainable Development in the period to 2030. These address social progress, economic well-being and environmental protection."

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 39 – "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 85 – "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, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential."

Paragraph 86 – "Planning policies should:

- a) Set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;*
- c) Pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics;*
- d) Seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and*
- e) Be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances."*

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Paragraph 87 – *“Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for:*

- a) Clusters or networks of knowledge and data-driven, creative or high technology industries; and for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of these industries (including data centres and grid connections);*
- c) The expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience.”*

Section 10 – Supporting high quality communications

Paragraph 119 – *“Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).”*

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 the latest technologies 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 120 – *“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.”*

In relation to this paragraph, it is demonstrated that a sequential approach to site selection has been adopted to ensure that existing telecommunications installations have been explored in the first instance to prevent unnecessary proliferation of masts. In this instance an existing base station has been identified for an upgrade scheme which negates the need to explore new locations.

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Paragraph 121 – “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 122 – “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 within 3km of a statutory safeguarding zone surrounding an aerodrome, technical site or military explosives storage area. Nearby schools and nurseries in close proximity have been consulted. The local planning authority was consulted with regards to the proposed upgrade scheme. An ICNIRP certificate is provided with this application to confirm that the proposal will not exceed International Commission guidelines. As the scheme is utilising an existing base station, it was not necessary to identify alternative site options.

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Paragraph 123 - *“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 131 – *“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 paragraph, the application seeks to upgrade an existing telecommunications site located on York House and the proposed equipment is the least amount possible to allow the site to transmit sufficiently; we therefore consider this design to be respectful to the character of the area. Although the site's change in appearance will to an extent be recognisable in any given context, efforts have been made to limit the visual impact on the surrounding amenity as far as practicable.

Section 16 – Conserving and enhancing the historic environment

Paragraph 207 – *“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 the Heritage Statement of this document and the impact of the proposal on these historical assets are explained in Design Considerations section.

Paragraph 214 – *“Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss...”*

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Paragraph 215 – “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.”

It is considered that the proposal is in accordance with these paragraphs as the application has been designed sensitively to be respectful of the identified heritage assets. Considerable efforts have been made to ensure the least amount of potential impact is imposed when balanced against technical constraints and the advancement of digital connectivity carries significant weight when considering the public benefits to be provided. Mobile operators are obligated to provide high quality connectivity across the country as a licensed utility provider in which sensitive land designations are often unavoidable circumstances to ensure continuous coverage.

Planning Practice Guidance

Design: Process and Tools

In parallel with Section 12 of the NPPF, developments must be well-designed where it can assimilate into its local surroundings and support the broader characteristics of the local authority. The proposed application submitted herein demonstrates compliance with this guidance as the 10 design characteristics have been taken into account in the design considerations of this proposal whilst also balancing the technical requirements of the site to ensure the technical objectives can be achieved.

Historic Environment

In addition to Section 16 of the NPPF, Planning Practice Guidance echoes the importance of conserving historic environments and the need for a flexible and thoughtful approach to get the best outcome. The PPG outlines that an understanding of an asset's ‘significance’ is integral to determining the potential impact and acceptability of proposed developments and ‘significance’ is defined as follows:

“‘Significance’ in terms of heritage-related planning policy is defined in the Glossary of the National Planning Policy Framework as the value of a heritage asset to this and future generations because of its heritage interest. Significance derives not only from a heritage asset's physical presence, but also from its setting.”

When applying this approach to the proposed scheme herein, the applicant has analysed the significance of the relevant asset(s) in question which has informed the overall design of the proposal accordingly. When balancing the potential

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impact of the proposal it is considered that these effects would not detrimentally harm the significance of the asset in terms of its character and setting due to the minor scale of works involved and the important context of the site being an existing and established base station that was deemed acceptable in its inception. In instances where such perceived harm may be apparent it is essential that the value of public benefits is given significant weight in the balanced consideration of the scheme. Within the context of improvements to the telecommunications infrastructure, the public benefits are far-reaching insofar as local residents, businesses and travellers across a large target coverage area are rewarded as a result of the proposed works.

Code of Practice for Wireless Network Development in England 2022

The Code of Practice is a guidance document created by the Department for Digital, Culture, Media and Sport, which aims to support the government's objective of delivering high quality wireless infrastructure whilst balancing the needs of environmental considerations. This document has been developed in collaboration with mobile network representatives, other government departments, public bodies, local planning authorities and protected landscapes. It is also a useful tool for other interested stakeholders such as community groups, amenity bodies and individuals with an interest in mobile connectivity.

The guidance aligns the agreed principles between operators and local planning authorities in respect to the siting and design of network infrastructure to outline the roles and responsibilities of both parties throughout the application process. Within this document it is recognised that digital connectivity is vital to enable people to stay connected and businesses to grow, and there is particular emphasis on the 5G rollout and future mobile generations, which will be vital for a range of uses and future smart city applications. Much of the principles in this guidance reflect those already highlighted in the NPPF however, there are notable excerpts to highlight for the council's considerations in the determination of this application.

With reference to Paragraph 19, the local planning authority is “encouraged to support the deployment of digital infrastructure by:

- *Incentivising connectivity: support the expansion of telecommunications networks, and take a 'joined-up' approach to the wireless infrastructure planning process, including ensuring that Local Plans effectively support the deployment of digital infrastructure.*
- *Facilitating sites: engage with operators when new sites have been proposed and discuss site requirements.*

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- *Engagement with operators: respond positively to requests for engagement and make decisions in line with national policy and Local Plans. For planning applications, find solutions to issues and ensure timely decisions are made.*
- *Information and communication: ensure that members of the public can access information about any development proposals within their local area. Send communications promptly to an appropriate operator contact (or their representatives)."*

When considering the siting and design of any given proposal, Paragraph 22 states, "The choice over the site selection and design of equipment is primarily dependent upon the coverage and capacity requirements and technical constraints of a specific location, although operators should make efforts to reduce visual impacts where possible."

Moreover, Paragraph 29 states, "There are factors that can affect the type of infrastructure that will be deployed... including location and the coverage and capacity requirements. Planning authorities should be aware of these constraints when considering proposals. In particular:

- *In urban areas, where there is a high level of demand for mobile data, mobile base stations are likely to need to be deployed more densely. In these settings you can expect to see more use of streetwork monopoles and rooftop installations and, in future, we are likely to see a larger number of smaller units (so-called "small cells") deployed on buildings and on street furniture.*
- *In rural areas, base stations often need to cover wider geographic areas. Operators may need to use tall masts or lattice towers to provide the required coverage. The location of masts can sometimes be dictated by access to transmission links back to the operator's main network and proximity to a power supply. Coverage in some areas can be limited because of the geography, topography and terrain."*

The guidance also provides further explanations for technical and operational considerations as below:

Paragraph 64 – "All wireless network installations are principally guided by the technical need for the site and the technical constraints placed upon transmitting a signal. The siting and design of such installations must therefore be balanced between visual impact and these needs and constraints. As set out in the siting and design section above, the three primary technical and operational considerations for installation sites are: ensuring that wireless infrastructure provides an appropriate level of coverage over the intended geographical

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area; ensuring that sites have sufficient capacity to meet user demand; and, requiring a connection to the wider network 'backhaul'."

Paragraph 65 – "Planning authorities should take account of these constraints, and those set out below, on network deployment and siting and design, when considering proposals."

Connected Nations UK Report 2024 (Published December 2024)

"The availability of mobile 5G continues to expand, with mobile network operators (MNOs) coverage ranging between 61% and 79% outside premises. 4 However, 5G coverage where all MNOs are present outside premises remains low, at 38% for our High Confidence level. We continue to see significant differences across the UK, with 5G deployed in 42% of sites in urban areas, compared with 16% of sites in rural areas.

4G remains the primary technology for mobile users, reaching outside more than 99% of UK premises and carries 78% of total mobile data traffic. 4G coverage where it is available from at least one MNO has now reached 95% of the UK landmass (delivering early on one of the key targets for the Shared Rural Network programme), with 4G geographic coverage across individual MNOs in the UK rising from a range of 80-87% last year to 88-89% this year. We note the 4G geographic coverage improvements because of the Shared Rural Network programme.

Total monthly mobile traffic overall has grown by 18% this year to 1069 PB6 , at a slower pace compared to the 25% growth observed between 2022 and 2023. Traffic carried on 5G represents around 21% of total monthly traffic, however it has seen the highest increase by approximately 50%, from 151 PB in 2023 to 227 PB in 2024.

Mobile connectivity has become an integral part of modern living; it enables effective communication, provides access to information and services, enhances productivity, and supports various aspects of daily life... While 5G traffic has increased rapidly, 4G continues to carry most of the mobile data traffic, accounting for c.78% of total monthly data traffic (a decrease from 81% reported last year)."

This application site is located within a vital area where network provisions must be enhanced to allow people to work at home, to allow schools to teach online and to enable better accessibility in all parts of the country, which will in turn relieve pressures for home-working and e-learning. As outlined in the report statistics, there is increased demand on 4G and 5G coverage which has seen annual growth. Such demands will require network infrastructure improvements

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to adequately serve its customers as well as futureproofing the network for years to come.

Ofcom Mobile Matters Report (July 2025)

Using crowdsourced data, this Ofcom report analyses people's experience of mobile networks across the UK to help identify areas of improvement. Ofcom recognises the essential services that mobile coverage enables and how society has become reliant and expectant for continuous high quality mobile coverage throughout the country.

The report has compared the data to results to previous years and it was discovered that across several performance metrics there was year-on-year decline, including data connection success rates. Whilst these performance metrics had no significant impact on the end user, it is still meaningful in illustrating the potential vulnerabilities of existing infrastructure and proves that there is a necessity to improve robustness and resilience.

The public benefits of the 5G rollout was also evident in the data results as download and upload speeds were far better compared to older generation technologies. In video streaming tests along 98.2% of 30-second video streams completed without interruption over 5G. This is compared with 96.6% over 4G and 88.3% over 3G.

Specifically in relation 5G Standalone networks, the data results also demonstrated the benefits of such services as it provided significantly higher download speeds when compared to 5G non-standalone areas (70% of 5G standalone download speeds measuring at 100Mbit/s or higher versus 46% for 5G non-standalone). When downloading file sizes of 2MB, 5MB and 10MB the download speeds via 5G standalone were also found to be 45% faster. These statistics underline the high extent of public benefits that can be achieved through infrastructure improvements such as this application.

Following on from this, the statistical comparisons between urban and rural areas highlight a sharp disparity that sees rural areas requiring vast improvements in order to match the same coverage levels as urban areas. For instance, the proportion of connections via 5G networks in urban areas reaches 29.5% compared to the 18.8% of rural areas.

The report further highlights the capacity challenges of base stations as it states, *"Although 'mobile network coverage' refers to the geographic area where mobile services are available, being within a coverage area does not guarantee a successful connection. Issues such as weak signal strength, network congestion due to high traffic, and service outages can limit or prevent access."*

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Consequently, the operators must build sufficient resilience into their network to help avoid these vulnerabilities that can affect the user experience.

Ofcom Online Nation 2024 Report

This Ofcom report looks at the current online landscape of the UK and outlines statistical evidence that shows how internet use has grown over time. These figures are an indication of the current network demands being experienced and explains why existing mobile network infrastructure needs to be improved to provide high quality coverage that is also fast and strong to its customers. Such network improvements can subsequently allow more users the freedom to undertake a variety of online tasks that are part of our everyday lives such as working from home, online banking, video calling, virtual classrooms, seeking medical assistance, etc. A few key statistics are noted below:

- *In May 2024, UK adults spent an average of 4 hours 20 minutes a day online, across smartphones, tablets and computers.*
- *Search engines are still widely used; 90% of UK online adults visited at least one of the top ten highest-reaching search engines in May 2024.*
- *Over half of UK online adults visited NHS online in May 2024.*
- *Fifty-seven per cent of UK internet users aged 16+ said they had used a cloud storage service in the past week.*

UK Digital Strategy 2022

"Digital infrastructure plays a vital role in our daily lives and is the foundation of a thriving digital economy. Every part of the UK needs world-class, secure digital infrastructure that enables people to access the connectivity and services they need – where they live, work or travel. This is why enhancing digital connectivity is Mission Four of the Government's Levelling Up White Paper. Our goal is to ensure that everyone, wherever they live or work in the UK, can access the connectivity and services they need for the ever-digitising world."

"A competitive and innovative digital economy will ensure the UK continues to be considered one of the most innovative countries worldwide and a competitive environment where technology businesses of all sizes can thrive."

Sir Chris Bryant MP Minister of State Department for Science, Innovation & Technology Letter to Council Leaders (Dated 29th November 2024)

This letter confirms the importance of fast and reliable connectivity and the Government's commitment to supporting the delivery of next-generation connectivity across the UK by supporting the implementation of the latest technologies and driving towards nationwide 5G coverage by 2030. In order to achieve these objectives there is a call for councils to prioritise and recognise

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the value of digital infrastructure improvements when engaging with telecommunications proposals.

UK Infrastructure: A 10 Year Strategy (June 2025)

This infrastructure strategy sets out a new approach by the UK Government in their long term investment for improved infrastructure across the country, which will have positive benefits in both economic and social capacities. This is in recognition of the important role that infrastructure plays in enabling growth and raising living standards.

"3.37 Digital infrastructure supports productivity growth through lowering costs for firms, underpinning technological change, widening access to labour markets across the country and enabling new and innovative services to be provided.

3.38 Digital infrastructure also increasingly underpins the provision of services critical for the functioning of society, business, and government – including the operation of other infrastructure sectors. In particular, demand for data centre services is projected to surge over the next decade including for AI development and deployment. The government is committed to facilitating the development and expansion of cutting-edge, secure, and sustainable digital infrastructure that meets the needs of both the private and public sectors.

3.43 The UK is currently undergoing a transformation of its digital infrastructure. 5G is being rolled out across the country and old copper broadband networks are being replaced with new gigabit capable connections.

3.46 The government is committed to removing barriers to the deployment of fixed infrastructure so that the commercial market can deliver as far and as fast as possible. This includes:

- Implementing the remaining provisions of the Product Security and Telecommunications Infrastructure Act 2022 as soon as possible.*
- Bringing forward a more flexible permitting system for street works across England, if the ongoing trials are successful.*
- Easing the process for gigabit deployment for leaseholders in multi-dwelling units, such as blocks of flats, and consulting on proposals as soon as possible.*

3.49 Businesses and critical national infrastructure also use digital infrastructure connectivity to provide products and services. To enable businesses and infrastructure providers to know when they need to upgrade, the government will work with industry to set out a forward-looking connectivity timeline. This will allow better planning of upgrades as part of regular research and development and/or lifecycle replacement, improving economic efficiency, saving public

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and private money and reducing the risk to life and critical services from upgrades.

3.50 High quality mobile coverage is now a necessity. Yet in many places coverage remains patchy and unreliable. The government has therefore asked Ofcom to provide accurate, public reporting on mobile coverage and performance. Ofcom have committed to launching their improved online coverage checker in June 2025.

3.52 The government's ambition is for all populated areas to have standalone 5G by 2030, delivered through commercial investment. It will enable a range of new industrial applications across the economy, including in manufacturing, broadcasting, public services, transport and logistics. An Analysys Mason study found that 5G adoption in key sectors could realise up to £37 billion additional Gross Value Added in the period from 2022 to 2035."

The UK Government Resilience Action Plan (July 2025)

This action plan recognises the vital role that digital infrastructure plays as part of the UK's critical national infrastructure. The effects of Covid-19 highlighted the immense public benefits of digital connectivity and our reliance on digital infrastructure to communicate with each other on both a social and economic level. This reliance however, also showed the vulnerabilities of existing systems and technologies that can be more susceptible to significant national risks that affect our everyday lives such as public service disruption and cyber-attacks. It is therefore of paramount importance that utilitarian infrastructure networks such as telecommunications are reinforced and improved to become more resilient and robust.

"Empowering and supporting this network of organisations to operate at their best is fundamental to our approach, and this action plan focuses on where we can maximise their efforts, including through the use of science and technology."

"The resilience of the UK's CNI [Critical National Infrastructure] is of central importance to ensuring that the essential services the public rely on continue to operate. Given the fundamental and connected nature of these services, failure has the potential to cause cascading and catastrophic consequences. This could be, for example, power outages impacting other essential functions, like transport or water provision, or a failure in the telecoms or data infrastructure sectors impacting the energy sector - across all four nations."

"Telecoms is part of our CNI and underpins many, if not all, economic sectors."

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"The UK government has undertaken a strategic overhaul of its approach to resilient telecommunications, which are paramount to respond to a National Power Outage and other national security risks. This has included a recent investment in ensuring our resilient voice capability, situated across the UK to enable a means of information flow across the local and national level, is fit for purpose and is now exploring opportunities to augment our capabilities with the addition of resilient data provision."

Cluttons: Connecting Today for Tomorrow 2025/2026

"The amount of data we use on our mobile phones has more than trebled since 2019 in the UK and is set to climb further. At the same time, the UK fell to a ranking of 53rd globally for mobile download speeds last year, and it looks like the UK will miss its own targets for rolling out standalone 5G across the country. Data usage over broadband in the UK has risen by more than 1600% since 2013, but the UK sits in 44th place globally for broadband speeds and fibre connections remain an issue for millions of households."

Consumers, industry, and policymakers all know that more needs to be done to make sure the UK has the digital connectivity it needs, not only to service the current demands from homes and businesses, but to future-proof the country with the increasing demands for more data as more services move online, and to be competitive on the world stage."

Some key survey statistics in the report include:

- BT reported that delays in rolling out standalone 5G is costing the UK economy £230 billion.
- Monthly data usage by UK mobile phone users is up from 292 petabytes (PB) in 2019 to 1069 PB in 2024 – a rise of more than 260%. [1 perabyte = 1,000 terabytes = 1 million gigabytes]
- The international organisation representing mobile operators, GSMA, has forecasted mobile data traffic growth to rise four-fold by 2030.
- Average mobile data download speed is 94.5 Mbps with the UK placing 53rd in the world in 2024. First placed Singapore by contrast provides average speeds of 316.9 Mbps, which is three times faster than the UK.
- 44% of MPs stated that their constituents have raised digital connectivity issues.
- Number of commuters working remotely whilst on the train has doubled since pre-pandemic statistics according to Trainline. However, the quality of internet connection is unreliable which impacts on productivity and can deter commuters from choosing to work whilst in transit.

These statistics illustrate how the UK is falling behind other countries around the world and the extent of improvements that are needed in order to cater for

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increasing demands from the UK population. Such network improvements also feed into the attractiveness of the UK as a place for global tourism and international business that can help to boost the economy even further.

Confirmation that submitted drawings have been checked for accuracy

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