

This prior approval application follows the previous approval on site (ref: 138669/TEL/2023) for a 20m monopole. Technical issues have arisen at the build stage which prevent the scheme from being built as per the approved scheme. Openreach have laid an expanded inspection chamber and equipment cabinet to support their fibre network in the middle of our clients approved development area.

This revised scheme therefore is for an amendment to the site layout and the proposed monopole type as required by the clients. The equipment cabinets proposed have been slightly relocated and the number of cabinets has been reduced from 5 as approved to 4. The number of proposed transmission dishes has been reduced from 2 to 1. Finally the monopole remains in the same location as approved but the pole type is proposed to be amended from a 20m high Hutchinson Apollo A12V2 Streetpole to a 20m high Hutchinson engineering M-Range G_506 Streetpole.

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Droylsden Road	Site Address:	Droylsden Road
National Grid Reference:	E:388173 N:400707		Failsworth Manchester M40 2FT
Site Ref Number:	30836200	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: No mast register available		

¹ Macro or Micro

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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:	No
Date of pre-application contact:	N/A
Name of contact:	N/A
Summary of outcome/Main issues raised:	
A pre-application consultation letter and copy of the proposal drawings were sent to the Chief Planning Officer at the Local Planning Authority by email on 27.09.2023.	
No specific comments received to date.	

Annual area wide information to planning authority

Has annual area wide information been provided?	No
If no explain why:	
Summary issues raised:	
<p>Cornerstone's commercial relationship with Vodafone has changed, effectively increasing their independence to work with other companies in the deployment of mobile infrastructure. It means they no longer have visibility of Vodafone's full update plan. However, Cornerstone is fully committed to working closely with Local Planning Authorities and following best practice guidance.</p> <p>We aim to engage and work with the planning department at the earliest opportunity from when we are instructed to deliver new infrastructure within your Local Authority area and often conduct strategic pre-rollout engagement meetings to discuss our wider rollout. If your Local Authority would like a meeting to discuss wider Cornerstone rollout plans then please advise. We recognise the importance of developing long term partnerships and will always work with you to deliver improved mobile connectivity.</p>	

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
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Outline of consultation carried out:

A pre-application consultation letter and copy of the proposal drawings were sent to the local Councillor for the Miles Platting and Newton Heath ward and the local MP Lucy Powell by email on 27.09.2023.

Summary of out come/main issues raised (include copies of relevant correspondence):

No comments have been received at the time of making this application.

School/College

Location of site in relation to school/college (include name of school/college):

Brighter Beginnings Day Nursery Ltd, Great Newton Street, Newton Heath, Manchester

Outline of consultation carried out with school/college (include evidence of consultation):

A pre-application consultation letter and copy of the proposal drawings were sent to the manager of the nursery by email on 27.09.2023.

Summary of outcome/main issues raised (include copies of main correspondence):

No comments have been received at the time of making this application.

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

Details of response:

N/A

Developer's Notice

Copy of Developer's Notice enclosed?

Yes

Date served:

Developers Notices sent via Tracked Email
26.08.2025

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3. Proposed Development

The proposed site:

Background

The site is to replace coverage which cannot continue to be provided at the current location at Newton Mill as the site is no longer able to support the operators' equipment and a Notice to Quit has been served.

As such, Cornerstone needs to find a replacement site to ensure existing connectivity is not lost to the surrounding businesses, commercial areas & transport routes in this area of Failsworth.



Image 1: The Existing Site (Source: Google Streetview)

Cornerstone is limited in siting options as there is a requirement to provide equivalent replacement coverage and capacity for this area of Failsworth. The replacement of an existing site means that the operator has to be located as close as possible to the existing installation in order to fit in with the surrounding network and to maintain the provision of equivalent coverage and capacity to the surrounding local area.

The proposed site is located at the back of the footpath between Droylsden Road and a small supermarket car park. The surrounding area is a mix of commercial and residential properties, with some new build properties opposite however they do not directly overlook the site. The site is adjacent to the junction of Droylsden Road and Oldham Road which is a strategic route through this area of Manchester therefore there is a significant number of people travelling through the area on a daily basis.

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There are a number of linear structures within the street scene including lighting columns, road signage, traffic signals and commercial signage which will help the equipment assimilate with its surroundings.



Image 2: The Application Site

It is vital that the connectivity provided by the existing site is replaced to provide continued reliable mobile digital connectivity to the area.

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

Cornerstone is seeking to replace the existing site at Droylsden Road to maintain 2G and 4G coverage and capacity as well as provide 5G services to the surrounding area for Vodafone to ensure high quality customer experience is maintained and up to date technology is provided as demands on the network increase and technologies change.

The 4G provision allows internet access, video calling, data downstreaming, accessing social media networks and emailing to name just a few of the benefits. Therefore, to maintain high quality indoor 4G services into this area would promote activity in line with the general population demand as the ownership of smart devices increases. 5G will deliver unparalleled speeds and capacity, with significantly reduced latency, which will be needed to deliver numerous innovative applications from autonomous cars to Internet of Things.

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Type of Structure (e.g. tower, mast, etc): Hutchinson Engineering M-Range G_506 Streetpole	
Description:	
The proposed installation of a 20m streetpole supporting 6 no antennas and 1 no 300mm dish together with 3 no ground based cabinets, 1 no meter cabinet, and ancillary development thereto.	
Overall Height:	20 Metres
Height of existing building (where applicable):	N/A
Equipment Housing: 2x Cheshire Cabinets	
Length:	640mm
Width:	1900mm
Height:	1722mm
Equipment Housing: 1x PSC Cabinet	
Length:	600mm
Width:	823mm
Height:	1721mm
Equipment Housing: 1x SFMC160	
Length:	255mm
Width:	655mm
Height:	1015mm
Materials (as applicable):	
Tower/mast etc – type of material and external colour:	Galvanized – RAL7035 Light Grey
Equipment housing – type of material and external colour:	Galvanized – RAL6009 Fir Green

Reasons for choice of design, making reference to pre-application responses:
<p>The operator carefully considered the design of the proposed column and is proposing the most sensitive design currently available to them which will provide the necessary coverage and capacity to the surrounding area. Due to the technologies that will be available at this location, 2G, 4G and 5G, 6 antennas need to be installed at the top of the slim-line monopole.</p> <p>The proposed height at 20m is essential to provide equivalent replacement coverage to the target coverage area of Failsworth.</p> <p>The proposed design is essential in order to fit all the operator's multi technology antennas within the same installation. This is the slimmest design possible which will enable all technologies to be supported from this site. If the column and antenna width were to be any slimmer then the technology would not fit in the one column and another radio base station would be required, which would lead to the proliferation of masts contrary to national Government guidance set out in the NPPF and The Code of Practice. Similarly, if the column were to be a uniform width throughout then the overall width would have to increase which would appear more visually prominent in the street scene, than the proposed design.</p>

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The proposed design is more visually sensitive and much easier to assimilate into a street scene than lattice towers or pole designs with bulky headframes. These non-stealth designs are preferred by operators as they are structurally capable of hosting more equipment and give greater scope for antenna orientation and are thus more efficient structures. However, such designs would appear alien in this location. Therefore, the operator has compromised on obtaining maximum coverage in order to better assimilate into the street scene.

The design of the column is a simple, functional, vertical structure which will not appear incongruous within the street scene. The column will be coloured grey to assimilate with an often British skyline. Although it can be coloured any other colour the LPA consider appropriate for example green.

The cabinets are designed to appear like other statutory undertaker's equipment cabinets. The proposed equipment cabinets are small for telecommunications apparatus and proposed to be coloured fir green like new Openreach cabinets in the immediate vicinity and others commonly found equipment cabinets on the roadside across the country.

The transmission dishes are required in order to provide a link into the network. A clear line of sight is required in order for it to meet its design brief. As such, a centre line height of 14.69m is proposed.

The operator is proposing to install a structure which will be capable of delivering replacement high quality indoor 2G/4G and new 5G services to the surrounding area for Vodafone.

It is therefore 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 requirements for the site. Taking all matters into account it is considered that this proposal, to provide the latest 4G and 5G service provision, delivering the capability required from a single network installation, would not appear out of place within the street scene.

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Health and Safety - including ICNIRP compliance
An ICNIRP certificate is provided as part of this application.

<p>International Commission on Non-Ionizing Radiation Protection Declaration enclosed</p> <p>International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines.</p> <p>When determining compliance, the emissions from all mobile phone network operators on or near to the site are taken into account.</p> <p>In order to minimise interference within its own network and with other radio networks, Vodafone operate their network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision</p> <p>As part of Vodafone's network, the radio base station that is the subject of this application will be configured to operate in this way.</p> <p>All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation, or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference.</p>	Yes	
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The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.		
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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

A mobile phone transmitter is designed to cover a specific area and links its coverage to the next site in the network, creating a patchwork of overlapping coverage 'cells' across the country. So, if a person is on the move, the network will transfer their calls from one site to the next. However, in certain areas there will be gaps between these cells, resulting in a loss of coverage. This can be for a variety of reasons, the most common being topography or buildings which block the path of the signal. The operator's network rollout programme is designed to identify and address these gaps within their coverage and ensure that people can use their phones whenever and wherever they are.

The National Planning Policy Framework states that local planning authorities should not question the need for the telecommunications system, which the proposed development is to support. However, for the avoidance of doubt as set out below the proposed installation is needed for Vodafone, via Cornerstone to replace existing 2G/4G coverage and capacity, as well as provide new 5G services to this area of Failsworth.

The 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.

Without this replacement installation, following the removal of the existing radio base station, the area would be detrimentally affected as the remaining installations continue to try to serve a much larger demand. The result would be constant buffering and dropped calls to the surrounding area, to the detriment of locals, businesses and visitors to the area.

Further detail regarding the general operation of the network can be found in the accompanying document entitled 'General Background Information for Telecommunications Development'. In addition, fact sheets on Radio Planning and Propagation and 5G services have been attached to this application for reference. This information is provided to assist the local authority in understanding any technical constraints on the location of the proposed development.

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There is a specific requirement for a replacement radio base station at this location following the planned removal of the existing site due to the legal Notice to Quit on the existing site which means it must be removed. This will allow Vodafone to provide replacement 2G and 4G digital connectivity, as well as new 5G service provision to this area of Failsworth and ensure residents and businesses do not suffer lost connectivity.

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).

The proposed site on the highway land to the east of the Droylsden Road will replace coverage for Vodafone in the local area following the planned removal of the site at Newton Mill. Following the previous approval granted by the LPA for a 20m installation at this site it is considered the best option for a replacement installation in terms of both radio and planning considerations.

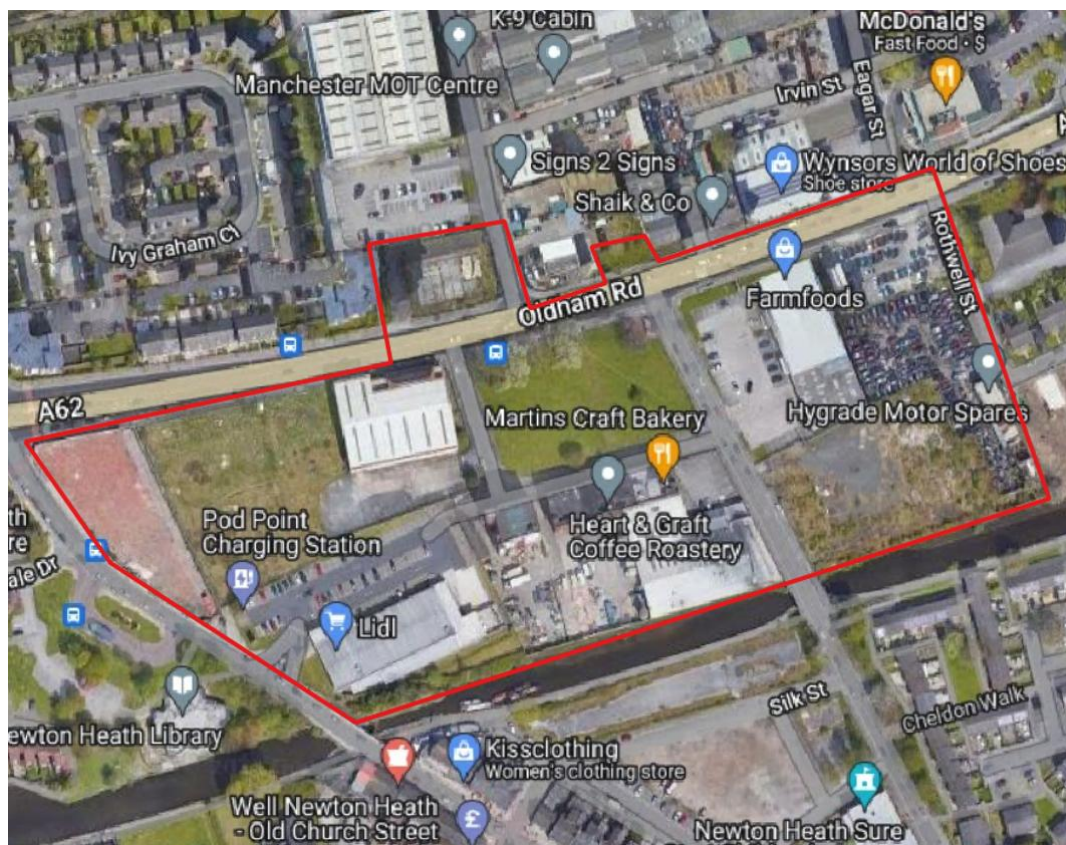


Image 3: Map Showing Search Area for the replacement site (outlined red)

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Discounted Option	Site	Site Name, Address, NGR, Site Type	Reason for not Choosing
Discounted Option 1	NTQ	Newton Mill, Manchester, M40 1HA (NGR: E388139, N400642)	This is the NTQ site. It is no longer available to the operator and has therefore been discounted.
Discounted Option 2	GF	Vacant Lot, Old Church Street, Manchester, M40 2JB (NGR: E387934, N400645)	Whilst there is adequate space to build an installation at this location, the site has potential for redevelopment in the future, and other alternatives exist which are more appropriate to deliver the required coverage to the target area at this time. The site has therefore been discounted for this reason.
Discounted Option 3	GF	Old Chinese Market/Land, Oldham Road, Manchester, M40 2EN (NGR: E388045, N400670)	The building has been demolished and the surrounding land is all under redevelopment. The site has therefore been discounted for this reason.
Discounted Option 4	GF	Vacant Lot 2, Oldham Road Manchester, M40 3AX (NGR: E388074, N400730)	Whilst there is adequate space to build an installation at this location, the site has potential for redevelopment in the future, and other alternatives exist which are more appropriate to deliver the required coverage to the target area at this time. The site has therefore been discounted for this reason.
Discounted Option 5	GF	Pound Stretcher Car Park, Manchester, M40 2EN (NGR: E388050, N400762)	Locating the new column and cabinets in the car park would reduce the overall parking provision which is in constant demand throughout the day. Any reduction in overall car parking spaces would detrimentally affect the daily operations of the retailer. As such, this location has been discounted.
Discounted Option 6	GF	Lidl Car Park, Old Church Street Manchester, M40 2JB (NGR: E388036, N400614)	Locating the new column and cabinets in the car park would reduce the overall parking provision which is in constant demand throughout the day. Any reduction in overall car parking spaces would detrimentally affect the daily operations of the retailer. As such, this location has been discounted.
Discounted Option 7	GF	Land to rear of Newton Mill, Holyoak Street, Manchester, M40 1HA (NGR: E388129, N400611)	The development of an installation in this area is likely be restricted due to potential physical access constraints along with congestion, and other locations are considered to be more

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			appropriate to deliver the required level of coverage to the target area. This site has therefore been discounted for this reason.
Discounted Option 8	GF	Farmfoods Car Park, Droylsden Road Manchester, M40 2FT (NGR: E388193, N400696)	Locating the new column and cabinets in the car park would reduce the overall parking provision which is in constant demand throughout the day. Any reduction in overall car parking spaces would detrimentally affect the daily operations of the retailer. As such, this location has been discounted.
Discounted Option 9	GF	Vacant Lot 3, Droylsden Road, Manchester, M40 1AN (NGR: E388233, N400644)	Whilst there is adequate space to build an installation at this location, the site has potential for redevelopment in the future, and other alternatives exist which are more appropriate to deliver the required coverage to the target area at this time. The site has therefore been discounted for this reason.
Discounted Option 10	GF	Land at Silk Street, Manchester, M40 1AN (NGR: E388180, N400570)	The surrounding land is all under redevelopment. The site has therefore been discounted for this reason.

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Image 4: Plan Showing Location of Application Site (red dot) and the Discounted Sites (blue dots) Source: Google Maps

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

N/A

Land use planning designations:

None identified at the time of making the application.

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

National Planning Guidance

Planning policy is provided at the national level by the National Planning Policy Framework (NPPF). It is a material consideration in planning decisions. The NPPF is pro – development with a 'presumption in favour of sustainable development' being seen as a golden thread, running through both plan making and decision taking'.

The thrust of this guidance is positive and a reminder to LPAs that we need to build the requisite infrastructure to enable economic growth.

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It is not necessary to quote extensively from this document but the following points are highlighted.

National Planning Policy Framework (updated February 2025)

The Government's National Planning Policy Framework (NPPF) was published on 24 July 2018 and updates the 2012 version. In February 2019 the NPPF was revised again, with minor alterations to wording relating to housing supply and not any parts relating to telecommunications. The NPPF was updated in July 2021, in order to strengthen sections including requirements on improved design quality, a new requirement for Councils to produce local design codes or guides, an emphasis on using trees in new developments, revised policies on plan-making, removing statues and opting out of PD rights relating to residential conversions. It was most recently updated again in December 2023, in relation to a number of themes including; flexibility for planning authorities in local housing need, clarification of Green Belt boundary alterations and acceptable brownfield development within the Green Belt. It strengthens the importance of building 'beautifully' and respecting the character of an area. It removes the need for annual five-year land supply updates, and protects neighbourhood plans from speculative development for five years. Also, the update encourages community-led and self-build developments and further protects agricultural land in its availability for food production. In December 2024, a further update took place, reversing a number of the previous revisions from December 2023. The update did not change any parts relating specifically to telecommunications development, other than the paragraph numbers. The amendment in February 2025 related specifically to footnotes 7/8 and paragraph 155 and did not include any changes relevant to telecommunications development.

The Government's latest thinking continues to strongly support communications infrastructure. The NPPF remains very supportive of high quality communications. Indeed, a whole chapter is dedicated to high quality communications, emphasising the importance that the Government attaches to digital connectivity. Paragraph 119 states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. This wording echoes guidance set out in paragraph 42 of the 2012 version of NPPF. However, it also includes the importance of reliable communications infrastructure for both economic growth and social well-being.

The NPPF continues to support the expansion of electronic communications networks at paragraph 119. It notes that 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. The economic and social benefits of providing high quality and reliable communications infrastructure are well documented and can be found later in this Supporting Information Statement.

The NPPF supports the expansion of telecommunications:

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"Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G)..." (para. 119).

Paragraph 120 of the NPPF sets out the requirement to minimise the number of installations consistent with the efficient operation of the network and also includes being consistent with the needs of consumers and providing reasonable capacity for future expansion.

Paragraph 123 of the NPPF retains guidance from a previous NPPF version which relates to local planning authorities determining 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.

At the heart of the NPPF is the retained presumption in favour of sustainable development (para 11). For decision-taking this means approving development proposals that accord with an up-to-date development plan without delay or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless the application of policies within the revised Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed or any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the revised Framework taken as a whole.

The NPPF continues to provide guidance on decision-making. At paragraph 39 it states that:

"Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including...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".

The NPPF builds on the aspiration to build a strong, competitive economy. Paragraph 85 states:

"Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking in to account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation"...

Paragraph 86 highlights that Local Development Plans should include policies that facilitate development to meet the needs of a modern economy, including identifying suitable locations for uses such as digital infrastructure. It goes on to confirm that planning policies should:

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"Set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to the national industrial strategy and any relevant Local Industrial Strategies and other local policies for economic development and regeneration."

It also states that they should:

"Seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment."

Paragraph 87 states:

"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." And (c) "the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience."

Code of Practice for Wireless Network Development in England (March 2022)

The Code of Practice (COP) provides guidance to Code Operators (referred to as 'operators' throughout the Code of Practice), including the Mobile Network Operators and wireless infrastructure providers, their agents and contractors, local planning authorities, and all other relevant stakeholders in England on how to carry out their roles and responsibilities when installing wireless network infrastructure. 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 aim of the Code of Practice is to support the government's objective of delivering high quality wireless infrastructure whilst balancing these needs with environmental considerations. It also has an important role in making sure that appropriate engagement takes place with local communities and other interested parties.

The Code of Practice covers all forms of wireless infrastructure development, including mobile masts and cabinets. It is recommended that other wireless communications operators follow the principles of this Code of Practice, where appropriate.

Unlike previous iterations this Code of Practice has been led by the Department for Digital, Culture, Media and Sport (DCMS) and developed in collaboration with representatives of the mobile network industry, other government departments and public bodies, local planning authorities, and protected landscapes. This document replaces the previous Code of Best Practice on Mobile Network Development, which was published in 2016 and is now published by DCMS.

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The COP sets out the legal and policy framework for the delivery of wireless infrastructure development.

Paragraph 8 of the revised Code acknowledges that connectivity is vital to enable people to stay connected and that fast, reliable digital connectivity can deliver economic, social and well-being benefits for the whole of the UK. The Code continues to acknowledge that as the demand for mobile data in the United Kingdom is increasing rapidly, and that it is important that everyone has access to dependable and consistent mobile coverage where they live, work and travel.

The Government recognises the role of Planning in delivering the digital infrastructure that we need, in a sustainable and well-designed way, especially as households and businesses become increasingly reliant on mobile connectivity.

Paragraph 13 of the Code continues to echo the NPPF guidance in strongly supporting high quality communications infrastructure, which is seen as essential for sustainable economic growth. More specifically that planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technologies (such as 5G) in order to support economic growth across the country.

The COP sets out 'How wireless networks function.

Para.16. states "Cellular wireless networks use base stations to provide an area of radio coverage. Wireless technology uses the radio spectrum to broadcast radio waves between base stations and devices. Different radio frequencies have different characteristics which, along with the density of cell site locations, affect the extent of coverage and how much data can be carried over the network. Depending on the radio frequencies used, base stations can deliver coverage over a wide area or provide extra network capacity in areas where there is a high demand for network bandwidth".

Para. 17 sets out that "Wireless technology continues to evolve rapidly, and mobile devices are now capable of much more. Second generation (2G) technology gave us voice calls and text messages, 3G led to the launch of smartphones, and 4G, which enabled faster browsing, allowed us to do things like watching videos on the move. 5G, the latest generation of wireless technology, is much faster than previous generations of wireless technology and can offer greater capacity and lower latency, allowing thousands of devices in a small area to be connected at the same time. 5G networks, and future mobile generations, will be vital for a range of Internet of Things uses (IoT) and Smart City applications".

The COP establishes 'Principles and commitments' by which operators should develop their networks and that Local Planning Authorities should demonstrate their support by.

Para. 18 states "Operators should develop their networks and install wireless infrastructure according to the following principles and commitments:

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- **Site sharing and use of existing infrastructure:** make use of existing structures, sites and masts wherever possible to reduce the need for new development. The NPPF states that, when installing mobile infrastructure, the number of masts and sites 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.
- **Consultation with local planning authorities, local communities and other stakeholders:** participate in dialogue with local planning authorities, along with other relevant stakeholders such as the highways authorities, Area of Outstanding Natural Beauty bodies, Historic England, and Natural England, including pre-application discussions, where appropriate. Maintain clear procedures, and high quality communication and consultation with local communities and other interested parties. Operators should agree community engagement with local planning authorities and share information as appropriate (see Pre-application consultation with local communities below).
- **Standardised and high-quality approach to planning applications, and the notification procedure:** provide standardised supporting documentation for planning applications (where appropriate) within the context of national and local requirements. Ensure planning submissions are of high-quality and provide the necessary evidence to support the application (as per the NPPF).
- **Prompt responses to enquiries:** respond to complaints and enquiries within a timely manner (see Review and Enquiries section below).
- **Siting and Design:** wireless infrastructure should be deployed in accordance with the guidance set out within this Code of Practice. Where appropriate, equipment should comply with the principles set out in the NPPF and consider any local planning policies, including any local and national design codes. When located in protected landscapes and other designated land, the sensitive nature of these areas must be considered.
- **Removal of redundant equipment and site restoration:** ensure that when infrastructure is upgraded, any equipment that is made redundant by the upgrade, such as brackets, is removed to benefit the local environment. Where a whole site is no longer in use, the site should be restored to its original state.
- **Compliance with guidance laid out in the International Commission on Non-Ionizing Radiation Protection (ICNIRP) public exposure levels guidance:** as required by spectrum licences, comply with international guidelines for limiting exposure to electromagnetic fields (EMF) - including, as set out in the NPPF, providing a statement that self-certifies that ICNIRP guidelines will be met with all applications (see Annex C).

Paragraph 19 states that Local Planning Authorities should demonstrate their support 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.

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- **Facilitating sites:** engage with operators when new sites have been proposed and discuss site requirements.
- **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)".

The added emphasis on support from Local Planning Authorities in the deployment in digital infrastructure is even more evident in the revised COP. The COP recognises the importance of collaboration and partnership to help drive network coverage across the country. It goes on to state that *'In all instances, it is important for all parties involved in the process to take a positive approach to consultation and engagement'*.

Siting and Design Principles

The government's objective is to deliver high quality, reliable wireless infrastructure whilst ensuring the impact of new network development is kept to a minimum. The siting and design of wireless network infrastructure is central to achieving this. The COP acknowledges that *'good siting and design principles should apply to all wireless network development and take into account any site specific considerations and context. Both can create better places in which to live and work and help make development acceptable to communities'*.

The Code provides guidance on siting and appearance principles. It sets out several design principles in respect of telecommunications development and acknowledges that the options for design used by an operator will be affected by site conditions including requirements to link the site to the network, landscape features and coverage and capacity requirements. The guidance includes at Para. 22 *'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'*.

Para. 23 confirms that there should be a **'presumption in favour of facilitating sustainable network development'** and, as such, operators and local planning authorities, as well as all other bodies involved in the deployment process, should work together to ensure connectivity needs are met and find viable solutions to deployment issues (emphasis added).

Paragraphs 24 - 27 sets out general siting and site selection principles which Operators should consider. The COP acknowledges at Para. 24 that *'Operators use a range of sophisticated, computer-based planning tools to predict levels of signal strength and coverage from sites for 2G, 3G, 4G and now 5G. Once an operator has identified a requirement for a new cell site, a suitable site needs to be found. Elements that make a site favourable include: having existing or ready access to a power supply, access to fibre optic cables, vehicular access, and, other buildings and development which may provide a level of existing screening.'*

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Operators will typically look to upgrade existing infrastructure prior to considering a new deployment, in particular for initial 5G deployment'.

Para 25 notes that 'When selecting sites for mobile infrastructure, operators should examine local plans and designations for the area, as well as carrying out an in-person site search to identify potential options which meet their requirements. Operators should follow these general siting and site selection principles:

- Installation on existing buildings and structures;
- Erecting new ground based masts;
- Camouflaging or disguising equipment where appropriate;
- Using small scale equipment (although small cells themselves are generally used to address capacity issues as opposed to providing coverage); and
- Mast and/or site sharing (including redevelopment of a site to enable upgrade or sharing with another operator)'.

Para. 26 highlights that the installation of all wireless infrastructure requires a balanced approach between the technical needs and constraints of the proposed site and the potential impact of the development. The three key technical and operational considerations for installation sites are:

- **Coverage:** wireless infrastructure needs to provide an appropriate level of coverage over the intended geographical area. This involves ensuring that antennas are elevated sufficiently (often via masts) to provide clear lines of sight for signals.
- **Capacity:** where existing network infrastructure can no longer meet the demand for network capacity in a particular area, additional sites may be required within that coverage area to meet the demand. This is more likely to be required in densely populated areas or areas of high footfall.
- **Backhaul:** the radio access network requires a connection to the core network. Backhaul is sometimes provided by a microwave link, which requires a clear line of sight between the two ends of the link.

Para 27 requires that Local Planning Authorities consider these issues and consider the need for a site within a limited search area alongside the public benefit of improved connectivity. Para. 27 further considers that in general, it should not, therefore, be appropriate for planning authorities to seek wider evidence of alternative sites (beyond that required by the NPPF), unless they consider the proposed development is unacceptable having regard to the relevant material planning considerations

In respect of 'Design', the COP at Para 28 acknowledges that the siting of wireless infrastructure will influence which design options are most appropriate for reducing the visual impact including

- **Protecting visual amenity**

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- **Mitigating visual impacts**

Para. 29 acknowledges that these factors along with location and the coverage and capacity requirements can influence the type of infrastructure structure that is deployed and requires that *'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.*

The COP establishes radio equipment housing (cabinets) principles. The COP at Para. 30 states that *"cabinets protect radio transmitters and receivers, provide the power source for mobile equipment, and are connected to antennas via cables. Equipment cabinets are likely to be needed at most sites. The cabinets must be of sufficient size to facilitate hosting various operating equipment whilst also allowing air circulation to reduce the potential for overheating"*. The COP establishes the planning and visual considerations for siting radio housing. These include:

- Colouring
- Siting on highways and footways:
- Highway safety:
- Listed buildings/ scheduled monuments and Conservation Areas:
- Access
- Trees

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 statutory development plan as defined by the Planning and Compulsory Purchase Act 2004 comprises:

- **Places for Everyone Joint Development Plan**
- **Manchester Core Strategy 2012 - 2027**

Places for Everyone Joint Development Plan

The Places for Everyone Plan is a joint development plan document for nine Greater Manchester districts – Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan. It took effect and became part of the statutory development plan for each of the nine districts on 21st March 2024.

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The vision for Greater Manchester is:

"Our vision is to make Greater Manchester one of the best places in the world to grow up, get on and grow old:

- A place where all children are given the best start in life and young people grow up inspired to exceed expectations.*
- A place where people are proud to live, with a decent home, a fulfilling job, and stress-free journeys the norm. But if you need a helping hand, you'll get it.*
- A place of ideas and invention, with a modern and productive economy that draws investment, visitors and talent.*
- A place where people live healthy lives and older people are valued.*
- A place at the forefront of action on climate change with clear air and a flourishing natural environment.*
- A place where all voices are heard and where, working together, we can shape our future."*

The Plan sets out a number of Strategic Objectives to help achieve its vision. Those relevant to the proposal include:

Objective 3: Playing our part in ensuring a thriving and productive economy in all parts of Greater Manchester.

Objective 4: Maximise the potential arising from our national and international assets.
We will:

- Ensure infrastructure provision supports growth in these locations.

Objective 6: Promote the sustainable movement of people, goods and information.
We will:

- Ensure new development provides opportunities for affordable, high quality digital infrastructure.

Objective 7: Playing our part in ensuring that Greater Manchester is a more resilient and carbon neutral city-region.

We will:

- Promote sustainable patterns of development that minimise the need to travel and contribute to cleaner air.

Objective 9: Ensure access to physical and social infrastructure.

We will:

- Ensure that our communities and businesses are supported by infrastructure;
- Improve the capacity and network coverage of digital, energy, telecoms, transport and water in key growth locations."

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Policy JP-S1 relates to Sustainable Development. It states that to help tackle climate change, development should aim to maximise its economic, social and environmental benefits simultaneously, minimise its adverse impacts, utilise sustainable construction techniques and actively seek opportunities to secure net gains across each of the different objectives.

Policy JP-P1 relates to Sustainable Places. Although this is a general design policy which was not written with telecommunications development specifically in mind, a number of its aims are relevant to all development including the application proposal. It states that development should conserve and enhance the natural environment, landscape features, historic environment, and local history and culture, and respect and acknowledge the character and identity of the locality in terms of design, siting, size, scale and materials used. Development should respond to the needs of all parts of society, enable everyone to participate equally and independently, provide opportunities for social contact and support, and promote a sense of community. Of particular relevance, point 14. states that development should be well-connected, particularly by digital infrastructure. It acknowledges that this will enable everyone to take advantage of the employment, cultural and leisure opportunities across Greater Manchester and beyond.

Section 10 of the Plan relates to Connected Places. It acknowledges that one of the Greater Manchester Strategy's ten priorities is to deliver an integrated network with world-class connectivity that keeps Greater Manchester moving and that drives prosperity, whilst protecting the environment, improving air quality and transitioning to a zero carbon future.

Para. 10.3 states:

"10.3 – Historically, connectivity has been primarily about transport, but increasingly digital connectivity is fundamental to our lives, enabling us to connect with people irrespective of location, and to access an unparalleled range of learning, employment and retail opportunities."

Para. 10.21 states:

"10.21 - ... The rapid rise in digital demand seems likely to continue, with more services being delivered digitally and ever-increasing data transfers requiring faster, higher-capacity broadband and mobile connections. As the Plan area becomes 'smarter' – utilising data to deliver services more swiftly and efficiently and adopting innovation such as connected and autonomous vehicles, artificial intelligence and the Internet of Things... travel patterns will change and digital will increase in importance. As stated in Our People, Our Place: The Greater Manchester Strategy, it is ultimately our ambition for the city-region to be the UK's leading digital city and one of Europe's top five."

Policy JP-C1 relates to an Integrated Network and states that, in order to help deliver an accessible, low carbon Greater Manchester with world-class connectivity, the Plan supports a range of measures, including enabling the provision of high quality digital infrastructure.

Policy JP-C2 relates directly to Digital Connectivity. It states:

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"We support the provision of affordable, high quality, digital infrastructure. In making decisions we will support a range of measures, including:

1. Enabling the roll-out of latest generation mobile technology and full fibre to the premises connectivity, in a way that maximises coverage whilst protecting townscape quality and ensuring an ability to respond to updated/changing technology..."

In the supporting text of the policy, para. 10.29 acknowledges that digital connections are increasingly important to every aspect of our lives, and states that it is important that everyone can access them so that they can fully participate in society and the economy.

Para. 10.30 states:

"10.30 – Any truly global city will need to have widespread, affordable, reliable, secure and future-proofed digital infrastructure that provides a competitive edge for businesses and support high-levels of social inclusion. This will be essential to capitalise on new innovations... Big data will also enable the city to be managed more effectively. By facilitating home-working, good digital infrastructure can also help reduce the need for travel and therefore help reduce carbon emissions, traffic congestion and air pollution."

Para. 10.31 acknowledges that digital connections will be imperative to the design, development and delivery of future services in the context of an expanding global city.

Para. 10.32 states that it is fundamental that all parts of the city-region have access to world-class digital connections. It recognises that the area suffers from limited access to mobile networks, especially in rural areas.

Para. 10.33 is clear that improving digital infrastructure and ensuring that new development is connected to it is a high priority for the city-region. It states that it will be important that the area is at the forefront of the roll-out of next generation mobile technology, and acknowledges that digital infrastructure will need to adapt and evolve throughout the Plan period to keep up with new digital technologies.

Manchester Core Strategy DPD July 2012

The Manchester Core Strategy was adopted in July 2012 and sets out the long term strategic policies for Manchester's future development and will form the framework that planning applications will be assessed against.

The Core Strategy Vision states that: 'By 2027 Manchester will be:

- A successful and accessible city in the front rank of cities in Europe and the world.*
- A city with a growing economy driven by the strength of the Regional Centre and Manchester Airport which supports a successful City Region. The knowledge based economy flourishes with an entrepreneurial community, characterised by a fully*

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skilled, inclusive working population.

- *Meeting the challenge of climate change at the forefront of environmental initiatives and improvement and continuing to deliver sustainable development and a more effective green infrastructure.*
- *A city with an increased and sustainable healthy population and a community which both benefits from and drives the City's productivity upwards.*
- *A city with neighbourhoods where people choose to live all their lives.*

In order to help meet this vision the Core Strategy sets out a number of spatial objectives.

Spatial Objective SO1 relates to spatial principles and aims to provide a framework within which sustainable development of the city can contribute to halting climate change.

Spatial Objective SO2 relates to the economy and supports a significant further improvement of the City's economic performance and spread the benefits of this growth across the City to reduce economic, environmental and social disparities, and to help create inclusive communities.

SO4 relates to Centres and aims to provide a network of distinctive, attractive and high quality centres, strengthening local identity, providing essential services close to homes and local access to healthy foods.

Policy SO1 relates to spatial principles and states inter alia that development in all parts of the City should:

- *Make a positive contribution to neighbourhoods of choice including making a positive contribution to the health, safety and well-being of residents.*
- *Considering the needs of all members of the community regardless of age, gender, disability, sexuality, religion, culture, ethnicity or income.*
- *Minimise emissions.*
- *Improve access to jobs, services, education and open space by being located to reduce the need to travel.*

Policy EC1 relates to employment and economic growth in Manchester. The policy states that the priorities for economic growth include:

- *Ensuring the continued social, economic and environmental regeneration of the city.*
- *Ensuring the connectivity to international markets for the import and export of goods to ensure competitiveness in international markets.*

Policy DM1 relates to development management. It is a general design policy which is not specifically related to telecommunications but contains some relevance for such applications. The policy states that all development should have regard to the following inter alia:

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- *Appropriate siting, layout, scale, form, massing, materials and detail.*
- *Impact on the surrounding areas in terms of design, scale and appearance of the proposed development. Development should have regard to the character of the surrounding area.*
- *Effects on amenity including privacy, light, noise, vibration, air quality, odours, litter, vermin, road safety and traffic generation.*

Greater Manchester Digital Blueprint

The Greater Manchester Digital Blueprint sets out the ambitions and approach to meeting them for the period 2023-2026, with regards to digital connectivity and growth. It identifies five digital priorities and four key strategic enablers, developed in collaboration with stakeholders from across Greater Manchester's digital sector, sharing strategic commitments. It states *"we remain committed to being a digital city-region with a difference. By putting people, the environment and place at the heart of our plans, we aim for a more inclusive and sustainable approach that builds on our greatest assets."*

The main aims of the Blueprint are to better the lives of people living and working in the Greater Manchester region, making them empowered by the opportunities a *"digitally fuelled city-region brings"*, and to use technology and data better to make the city region a greener, fairer and more prosperous place.

The foreword, by Councillor Eamonn O'Brien, states:

"Our 2023-26 Digital Blueprint sets out our priorities for a more digitally resilient and rapidly growing Greater Manchester, so that everyone regardless of age, location or situation can benefit from the opportunities that digital can bring."

The Blueprint targets include having 200,000 people engaged, helping them benefit from the digital world in 2023-24, and achieving a minimum 90% gigabit coverage across Greater Manchester by 2024. In areas where fibre connectivity is difficult, existing mobile networks can be utilised to ensure gigabit connectivity is provided.

One of the priorities identified is *"Creating connected, inclusive, sustainable places"*, and a strategic enabler for this to be met is to extend digital infrastructure. The Blueprint states that the city-region will *"ensure we have world class digital infrastructure that stimulates economic growth and enables the development of our growth zones, across sectors and localities"*.

Greater Manchester Strategy 2021 – 2031

The Greater Manchester Strategy 2021 – 2031 sets out a plan to ensure *"Good Lives for All" within Greater Manchester, making it "a great place to grow up, get on and grow old; a great place to invest, do business, visit and study"*. It is accompanied by a three-year delivery plan which will be monitored, revised and reviewed on a regular basis.

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The Strategy states:

"We were already on a digital journey, which has been accelerated by the pandemic. As part of our recovery and the progression of Greater Manchester, we will continue to embrace digital technologies and deliver ambitious digital infrastructure plans for our city-region, ensuring our people and places can make the digital shifts required to enable the attainment of our collective ambitions."

The Strategy acknowledges that at the moment, it is not a level playing field for many in the city-region, and it seeks to redress that imbalance head on. One of the main aims of the strategy is to drive out digital exclusion, ensuring all sectors of society have digital access and can benefit from the realisation of opportunities. Part of this involves:

"...it will be important to build on the rapid acceleration in digital communication and access to services which has enabled more people to work from home and access a wide range of opportunities without the need to travel."

It is also stated:

"The development of all our places will be underpinned by the extension of our world class digital infrastructure, ensuring businesses and homes are digitally enabled and equipped. We will... strive to address digital exclusion and accessibility in an increasingly digitised society."

Greater Manchester Local Industrial Strategy (June 2019)

The Local Industrial Strategy sets out how Greater Manchester (GM) will forge its future. It states that it will build on GM's position as a *"leading European digital city-region; enable the digitalisation of all sectors; and capitalise on the links between digital and creative industries that feed internationally significant clusters in broadcasting, content creation and media, and maximise growing assets in cyber security"*.

It aims to put in place the integrated 21st century infrastructure needed for digital driven, clean and inclusive growth, retaining its place as a top 5 city-region for the digital economy in Europe, with full fibre broadband and 5G coverage.

The Strategy states that GM will take a 'Made Smarter' approach to all industries, supporting firms to adopt new digital and creative techniques and enabling the digitisation of all sectors.

The strategy has a specific section relating to infrastructure and acknowledges its importance:

"...the city-region now aims to upgrade, integrate and future-proof its infrastructure, to create a 21st century city-region with extreme digital connectivity, clean and inclusive growth and – through work with others – improved access to national and global markets... Existing

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partnerships are working to improve digital infrastructure in the city-region to meet national targets of roll of 5G technologies for most people by 2027".

The Local Industrial Strategy sets out an objective to ensure the vision for infrastructure is met:

"World-class connectivity – digitally and through an integrated transport network within all parts of GM."

To achieve the ambitions of the GM Local Industrial Strategy it identifies actions around 5 foundations of productivity: Infrastructure, Ideas, People, Business Environment and Places. These are noted as being essential attributes of every successful economy. It also identifies opportunities grouped under 4 Grand Challenges – Artificial Intelligence and Data, the Ageing Society, Future Mobility and Clean Growth.

The Vision for the Digital, Creative and Media is set out in the Local Industrial Strategy and reproduced below:

"GM will be a leading European digital City-Region, with the infrastructure, skills and networks needed to digitise all sectors, and internationally significant clusters in broadcasting, content creation and media and cyber security."

To help meet the vision, the strategy states that GM will continue to transform the digital connectivity of the city-region to drive economic growth and innovation, working with Government to meet national targets of full roll-out of 5G technologies for most people by 2027.

The Local Industrial Strategy acknowledges that GM will aim to become one of the best digitally connected city-regions in the UK. It fully supports the maintenance and development of networks, including 4G and 5G.

Greater Manchester Infrastructure Framework 2040

This is a pre-cursor to the GM Infrastructure Strategy. The aim is to focus on developing infrastructure which ultimately improves the lives of all those living and working within Greater Manchester.

The Infrastructure Framework acknowledges a number of key challenges, one of which is digital and the need to provide pervasive, affordable, resilient digital connectivity. The Framework notes that "Digital technology is increasingly the backbone of the major industries and our daily lives".

The Framework goes on to state that approaching 2040, GM will need to be a Smart and digitally ready City Region. To achieve this, and support on-going digitalisation, the region will require resilient fixed connectivity (through fixed fibre) supported by 5G (and subsequent technologies). It will also need to streamline the process for installation of new infrastructure within the street space.

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The Framework notes the vision for the GM Infrastructure Strategy:

"Develop and maintain a holistic infrastructure system that is robust, accommodates sustainable growth and supports the ambitions of the Greater Manchester Strategy to make "Greater Manchester one of the best places in the world to grow up, get on and grow old."

" The Greater Manchester Infrastructure Strategy should seek to:

- o Support the lives and well-being of people, communities and the environment within Greater Manchester.*
- o Be age-friendly and support the economic and social participation of both young and old.*
- o Support strategically identified growth for parts and communities within Greater Manchester.*
- o Be flexible, robust and meet the existing and future needs of the communities and technological change.*
- o Provide world-class connections and access to opportunity for all.*
- o Provide world-class digital infrastructure which provides a platform for GM to embrace emerging technological and societal changes.*
- o Support a carbon-neutral GM and be economically, environmentally and socially sustainable."*

The Framework identifies a key infrastructure trend to 2040 as Digital (Telecommunications Operators) including mobile infrastructure:

"As the population and employment is due to rise:

- o more people will mean more homes and businesses, and more consumers of digital services.*
- o There will be a growing demand for high-speed, resilient data connectivity to facilitate changing patterns such as shopping patterns moving online, whilst flexible working becomes more prevalent.*

Changing workforce:

- o More productive, higher skilled, higher paid jobs more specialised and skill activities needs digital infrastructure to support higher skilled industries – which may require increased digital infrastructure.*

Environmental Change:

- o Improving efficiencies of buildings and appliances. The use of smarter technologies within each infrastructure sector will look to improve efficiencies further."*

The Framework comments on digitalisation noting the importance of it and how it has transformed the way in which we go about our everyday lives:

"We live in an increasingly digital world. Technologies that are visionary today rapidly become part of everyday life tomorrow. In turn, people's expectations are rising constantly. "Digital" now encompasses an increasing array of technologies, from sensors, smartphones and robots, to augmented reality, cloud computing and data analytics. These technologies are changing the way in which we live and places we live in. Digital technologies are being

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used to make cities more smooth running, more productive, and more democratic. The pervasiveness of digital technology in our lives represents a major change. For these technologies to function effectively, it is fundamental that a robust and diverse underpinning infrastructure is installed that ensures a future-proofed platform for the development of these and many new technologies for years to come.

As our homes, businesses and cities become more reliant on digital technology to function the robustness of these systems becomes even more critical".

The Framework states that "anyone in GM should be able to access resilient, seamless connectivity at a speed they need anywhere and anytime":

"New technologies, artificial intelligence and atomisation:

- o Improvements in artificial intelligence and atomisation technologies will transform infrastructure sectors and business markets.

- o Digital infrastructure will be crucial to supporting future technology and a Smart City Region.

- o Embracing digital technology throughout all sectors, geographies and occupations is fundamental to GM's current and future international competitiveness."

The Framework acknowledges that the vision of moving to a smart and digitally-ready city region requires future digital infrastructure to be strong fixed resilient connectivity, supported by 5G (and beyond), big data systems and other nascent technologies such as Artificial Intelligence and machine learning. Without connectivity it is acknowledged that processing the sheer volumes of data necessary to create a network of communicating devices will be impossible. As such, the Framework states that big improvements are required to increase the provision of wired and wireless (through 5G or subsequent technologies and Wi-Fi provision) across GM. Without the more basic technology solutions (such as passive fibre connectivity and 5G) the smart-region solutions and value-added outcomes will struggle to be brought to fruition.

The Framework notes that 5G roll out is expected from 2020. However, the timing and costs of roll out is uncertain and international standards have yet to be agreed. It is possible that there will only be one network upon which providers deliver their services or that each provider might need to invest.

With regards to the Regional Centre if Challenge 8 is to be met to provide pervasive, affordable, resilient digital connectivity the challenge is early roll out of 5G especially in areas where mobile data use is congested such as the Regional Centre.

The Framework also states that GMCA and the Districts together with digital and telecommunication providers need to drive forward opportunities to promote connectivity and uptake in the Regional Centre.

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UK Wireless Infrastructure Strategy, April 2023

In April 2023, the UK Government published the 'UK Wireless Infrastructure Strategy'¹, a plan for delivering world-class digital infrastructure which the government identifies as an essential enabler for its 5 priorities of building a better, more secure, more prosperous future for the UK, including growing the economy, and creating better-paid jobs and opportunity right across the country. In her foreword, the Rt Hon Michelle Donelan MP, Secretary of State for Department for Science, Innovation and Technology, provides context for the strategy:

*"5G will be the cornerstone of our digital economy. With higher capacity and lower latency, standalone **5G will drive growth** in the industries of today and tomorrow, including in emerging sectors like artificial intelligence where Britain leads the world. Just take smart ports, where 5G-enabled remote operation can help us to move containers more quickly, efficiently, and safely, boosting our international competitiveness. **5G can improve our public services**, too, in everything from education to social care. In transport, for example, we can use 5G to power forward progress in everything from real time travel information to augmented reality navigation and self-driving buses and taxis.... This is an incredible opportunity; widespread adoption of **5G could see £159 billion in productivity** benefits by 2035".*

The Future Telecoms Infrastructure Review, 2018 sets out the ambition of the Government for the UK to become a world leader in 5G technology and ensuring world class connectivity for all. This ambition was reaffirmed in the 'UK Wireless Infrastructure Strategy', published in April 2023 which states in the Executive Summary:

"The next decade will see seismic changes both in terms of what wireless connectivity can deliver and how we can use it. The economic and social benefits from these changes promise to be vast, from supercharging growth to accelerating our transition to net zero. But these benefits can only be achieved with concerted action from government, industry, and others".

The Foreword of the 'UK Wireless Infrastructure Strategy' by Julia Lopez MP 'Minister of State for Department for Science, Innovation and Technology' states inter-alia:

"The more our lives are conducted online, the more access to the internet becomes critical for social and economic opportunity.

This is why delivering world-class digital infrastructure to all Britons is a fundamental mission of this government - and our efforts to build it the modern equivalent in scale and ambition to the Victorians' construction of the railways. Our plan is for every corner of our country to get lightning fast connectivity, not only to give people real choices about where to live and work today but so they will not be left out of future technological revolutions because of poor infrastructure.

It is this sense of purpose that underpins Project Gigabit, our flagship £5 billion programme to reach hard-to-reach communities across the UK with gigabit-capable broadband. It is

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complemented by a staggering competition now underway between commercial suppliers to supply Britons with great connectivity.

Extraordinary progress is being made on coverage. When I began my role in September 2021, gigabit coverage was just over 50%. Now, it stands at almost 75%. With £1bn of Project Gigabit's funding now available to suppliers, our contracts are not just delivering better internet but skilled jobs everywhere from Blandford to Berwick. By the end of next year, we hope to have every part of our country under contract.

Which is why the time is right to turn our sights to mobile connectivity, where the same sense of mission is needed to deliver the kind of wireless infrastructure that will transform how we live our lives and run our economy. This is not simply a matter of improving download speeds as people browse the internet on their phones or dial into work calls. It is far more transformative than that'.

The UK Wireless Strategy states that '4G technology revolutionised the way people use their mobile phones. What today is considered normal, a decade ago was ground-breaking. We have seen the growth of streaming services, like Netflix and Spotify, and gained constant access to high-quality, user-produced content for free on platforms like YouTube, transformed the way we shop online, travel around cities through access to apps like Uber and Bolt and use public services, such as booking NHS appointments through apps'.

The UK Government in the UK Wireless Infrastructure Strategy' recognises that 'growth in the digital sector is nearly 6 times faster than across the economy as a whole.

Connected Nations Report 2022

The Connected Nations Report 2022 was published in December 2022. The report confirms in line with the UK Wireless Infrastructure Strategy (April 2023) in respect of delivering a basic 5G signal for the majority of the population by 2027, 5 years early that 5G rollout is expanding, stating:

"5G rollout is expanding EE, Virgin Media O2, Three and Vodafone have continued to extend their 5G networks across the UK, and we are reporting individual mobile network operator (MNO) coverage for the first time, based on the High to Very High Confidence range which we established in 2021. These ranges cover an increasing probability that the coverage predicted by MNOs will translate into coverage on the ground. As noted above, the level of coverage provided outside of premises by at least one mobile network operator across this range is now at 67-77% (up from 42-57% last year). The coverage provided outside of premises from individual MNOs ranges from 39-58% at High Confidence, with a range of 31-45% at our Very High Confidence level. Though most 5G sites are focused around busy urban areas - providing additional capacity to existing mobile data services - we're now seeing coverage extending into smaller towns and other high footfall locations. The distribution of this investment remains broadly similar to last year, with 86% of sites in England, 8% in Scotland, 4% in Wales and 2% in Northern Ireland".

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Connected Nations 2023

The Connected Nations 2023 was published in May 2023. This is the first interim update to their Connected Nations 2022 report. It is based on mobile coverage and fixed broadband availability across the UK as of January 2023. Ofcom is a measure mobile coverage in a way that reflects the likely experience of people using their mobile phones. The report acknowledges that there has not been a significant increase in coverage since the December 2022, but the industry continues to develop its coverage footprint.

"4G: Coverage of 4G mobile networks across the UK has not seen significant changes over the last reporting periods. Around 92% of the UK landmass is predicted to have good outdoor 4G coverage from at least one operator, and this area includes nearly all of the premises in the UK. This is expected to rise to 95% by end of 2025 as a result of the SRN.

4G not-spots: The UK has both geographic and road not-spots (that is, areas where good 4G services are not available from any mobile operator). Geographic not-spots have remained the same since our December 2022 report at 8%. Road coverage remains largely the same with just 4% of all roads estimated to be an in-vehicle not-spot. This varies significantly across individual nations, particularly in Scotland and also in Wales. Wales has benefited by a percentage point drop in geographic notspots since our December report, which we attribute to the SRN scheme.

Calls and text coverage: As with 4G, predicted coverage for calls and text services remains largely unchanged over the previous reporting periods. The range of predicted coverage by MNOs varies from 85-93% of the UK landmass, depending upon operator. In addition, 99% of all UK premises are predicted to have coverage for outdoor voice calls from all MNOs.

Calls/text not-spots: Areas where people are unable to make a call or send a text from any operator (not-spots) is similarly unchanged, with around 4% of the UK geography estimated as a not-spot, and around 2% of the UK's roads estimated to be a not-spot for calls and texts made or received in vehicle. As with 4G, there are marked variations for individual nations; for example, geographic notspots across Scotland remain higher than for the rest of the UK, at around 10%.

5G: We continue to report on 5G coverage (outdoors premises) from 'All MNOs' and from 'At least one MNO', with coverage confidence levels ranging from high to very high. Coverage from 'At least one MNO' now ranges from 73% (very high confidence) to 82% (high confidence) of premises outdoors, up from 67% and 78% respectively when we reported in our December 2022 report".

Connected Nations UK Report 2024

The Connected Nations UK Report 2024 was published on 5th December 2024. It provides updated data on the coverage and usage of fixed broadband and mobile networks within the UK, reporting on the further development of 4G networks and progress on the rollout of 5G networks.

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The report states that “the availability of mobile 5G continues to expand, with mobile network operators (MNOs) coverage ranging between 61% to 79% outside premises. 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.”

In relation to 4G technology, the report states:

“4G remains the primary technology for mobile users, reaching outside more than 99% of UK premises and carries 78% of total mobile traffic data. 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 improvements because of the Shared Rural Network programme.”

The report also touches upon the phasing out of legacy mobile networks. MNOs have begun phasing out their 3G networks, with two operators having completed the process, and have committed to shutting down their 2G networks by 2033. Over 2 million devices remain reliant on 2G/3G networks, which highlights the need for mobile providers to ensure that their sites are ready for the increased traffic to the more recent 4G/5G technologies.

Online Nation 2022 Report

The ‘Online Nation 2022 Report’ produced by Ofcom confirms the following:

- UK adults spend almost 4 hours a day online, 3 hours of which are spent on smartphones. (UK young adults (i.e., 18-24 year olds spend approximately 5 hours online and UK adults aged 55+ spend approximately 3 hours online)
- 73% of time spent online/day by UK adults was via a smartphone
- 1 in 5 people use only a smart phone for online access compared with 1 in 10 in 2020

With regards to increased usage of smartphones only for online access the report suggests:

“More people are using only a smartphone to go online. People were more likely in 2021 than in 2020 to only use a smartphone to go online (21% vs 11% in 2020)^[2]. There could be many reasons, but this may be because people were spending more time at home in late 2020 and early 2021 than in late 2021, and therefore used a wider range of devices. It may also reflect the larger screen size and better-optimised app functions of many smartphones, making them easier and potentially more cost-effective to use as a sole device for accessing the internet.

^[2] Ofcom Adults’ Media Literacy Tracker 2021: Core survey IN1. Which of these devices do you use to go online? (single coded)
Base: All adults aged 16+ who go online at home or elsewhere (excluding those who did not give a response at the postal survey)
– 3,577

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The Report goes on to states that:

"In September 2021 73% of the time spent online by UK online adults per day was on a smartphone. UK online adults are also spending slightly more time using tablets than computers, demonstrating that there is a clear preference for using mobile devices to go online. Those aged 25 to 34 spend the highest proportion (85%) of their online time using a smartphone, followed by 35-44s (80%); 15-24s (78%); 45-54s (74%) and those aged 55+ (55%).^[3]"

Therefore, without the improved network coverage and capacity that the proposed essential infrastructure will bring, Vodafone's network users living, working and travelling in the local area, and those of the associated MVNOs, will not benefit from reliable mobile digital connectivity when using their smartphones for business, education and personal purposes.

Mobile UK is the trade association of the UK's mobile network operators (MNO)s - EE, Virgin Media O2, Three and Vodafone. Mobile UK's mission is to realise the power of mobile to improve the lives of our customers and the prosperity of the UK.

Mobile UK produced 'From Exclusion to Inclusion How mobile connectivity can further narrow the digital divide'² in June 2023. The Foreword states:

"In today's world, it is becoming harder to conduct our day-to-day lives without needing access to the internet. Bricks-and mortar-banks are disappearing from the high street as they move to online banking; grocery shopping can be conducted via apps and delivered directly to your door; and GP appointments and medical consultations are increasingly conducted via video software. Even access to new jobs and relationships has become an 'online first' activity.

Mobile connectivity plays a vital role in promoting digital inclusion through:

- The use of devices.

Mobile devices can be an affordable method of connecting to the internet – cheaper, for instance, than desktop PCs or laptops – and are easier to use.

- The availability of data services.

Mobile connectivity gives people access to the internet wherever there is a signal, including in homes where fixed connectivity would be too expensive or impractical.

Tens of millions of people access the internet using mobile devices and mobile

^[3] Ipsos, Ipsos iris Online Audience Measurement Service, 1 September–30 September 2021, adults age: 15+, UK. Note: Custom data supplied by Ipsos.

² <https://www.mobileuk.org/digital-inclusion>

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data. Crucially, a significant number of people **only** access the internet using mobile devices and mobile data:

- 21% of UK adults only access the internet using a smartphone.

This proportion is higher within those groups more likely to be digitally excluded³, including the most financially vulnerable (31%) and those in lower socio-economic groups (29%).

- million households only have access to a mobile internet connection at home⁴

'From Exclusion to Inclusion How mobile connectivity can further narrow the digital divide' recognises that 'Huge progress has been made in recent years to ensure that a quality mobile connection is available to as much of the population as possible:

- At least two-thirds the population has 5G coverage in their area. Ofcom data shows that the level of 5G coverage provided outside of premises by at least one mobile network operator is 67-77%.
- The Shared Rural Network (the SRN) is bringing coverage to hard-to-reach places. £1bn is being spent on the SRN, which aims to extend 4G coverage to 95% of the UK landmass by the end of 2025.

DSIT Letter 'Supporting digital infrastructure deployment in your local area'

The Government recognise that fast and reliable digital connectivity is increasingly important to our way of life. The support from Government was clarified in a letter sent to Council Leaders and Council Chief Executives across the UK, on the 29 November 2024, by Sir Chris Bryant MP in support of digital infrastructure deployment.

The letter, entitled 'Supporting digital infrastructure deployment in your local area', confirms the importance of fast and reliable connectivity to our everyday life, as people increasingly rely on their devices to work, learn and stay connected with each other, demand for greater speeds and more reliable connectivity is growing. Better digital connectivity is also key to delivering faster economic growth and increasing social inclusion. The Government is commitment to supporting the delivery of next- generation connectivity across the UK by driving towards nationwide 5G coverage by 2030. The letter requests help from Councils across the UK to achieve these goals by prioritising digital infrastructure and focussing on a number of areas that remain a challenge to telecoms investment.

³ 'Digitally Excluded – There is a divide between the digital haves (the digitally included) and the digital have nots (the digitally excluded). Not everyone can access the full range of benefits that digital connectivity has to offer. Those people who cannot, of which there are millions in the UK, often experience lower levels of wellbeing and poorer life outcomes.

⁴ LGA, November 2021, Tackling the digital divide, <https://www.local.gov.uk/parliament/briefings-and-responses/tackling-digital-divide-house-commons-4-november-2021>

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'Keir Starmer in the Times: We will launch a golden era of building'

"Every road, pylon and mast — which connect people with opportunity — must jump through endless hoops, only to be opposed, dragged out, before eventually, if lucky, approved".

Levelling Up the United Kingdom (February 2022)

The Department for Levelling Up, Housing and Communities (DLUHC) published the 'Levelling Up the United Kingdom White Paper' on 02 February 2022. Levelling up is a moral, social and economic programme for the whole of government. The Levelling Up White Paper sets out how the Government spread opportunity more equally across the UK.

The 'Levelling Up the United Kingdom White Paper' champions that

'the United Kingdom is an unparalleled success story – a multi-cultural, multi-national, multi-ethnic state with the world's best broadcaster; a vibrantly creative arts sector; a National Health Service which guarantees care for every citizen; charities and voluntary groups which perform a million acts of kindness daily; globally renowned scientists extending the boundaries of knowledge every year; entrepreneurs developing the products and services which bring joy and jobs to so many; and millions of citizens whose kindness and compassion has been so powerfully displayed during the COVID-19 pandemic.

But not everyone shares equally in the UK's success. While talent is spread equally across our country, opportunity is not. Levelling up is a mission to challenge, and change, that unfairness. Levelling up means giving everyone the opportunity to flourish. It means people everywhere living longer and more fulfilling lives, and benefitting from sustained rises in living standards and well-being.

This requires us to end the geographical inequality which is such a striking feature of the UK. It needs to begin by improving economic dynamism and innovation to drive growth across the whole country, unleashing the power of the private sector to unlock jobs and opportunity for all. While there are world-leading and enterprising businesses and innovators right across the UK, economic growth and the higher productivity which drives it has been over-concentrated in specific areas, particularly the South East of England. A long tail of low-productivity businesses and places explain why UK productivity growth is too low compared to competitors. It is vital that we preserve and enhance the economic, academic and cultural success stories of the UK's most productive counties, towns and cities. But it is equally critical that we improve productivity, boost economic growth, encourage innovation, create good jobs, enhance educational attainment and renovate the social and cultural fabric of those parts of the UK that have stalled and not – so far – shared equally in our nation's success'.

The 'Levelling Up the United Kingdom White Paper' states that:

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'The UK Government has made progress towards spreading opportunity around the country since 2019, alongside mitigating the worst effects of the pandemic, with:

- £5bn for Project Gigabit to bring gigabit-capable broadband to 85% of the UK by 2025, and the £1bn Shared Rural Network deal with mobile operators delivering 4G coverage to 95% of the UK by the end of 2025;
- five-year consolidated transport settlements amounting to £5.7bn in eight city regions outside London, £5bn of funding for buses and active travel over this Parliament; and £96bn for the Integrated Rail Plan delivering faster, more frequent and more reliable journeys across the North of England and the Midlands;

Levelling up is not about making every part of the UK the same or pitting one part of the country against another. Nor does it mean dampening down the success of more prosperous areas. Indeed, by extending opportunity across the UK we can relieve pressures on public services, housing and green fields in the South East. And levelling up can improve well-being in the South East by improving productivity in the North and Midlands. So, it is about the success of the whole country: realising the potential of every place and every person across the UK, building on their unique strengths, spreading opportunities for individuals and businesses, and celebrating every single city, town and village's culture. This will make the economy stronger, more equal and more resilient, and lengthen and improve people's lives. The economic prize from levelling up is potentially enormous. If underperforming places were levelled up towards the UK average, unlocking their potential, this could boost aggregate UK GDP by tens of billions of pounds each year. Levelling up skills, health, education and wellbeing would deliver similarly-sized benefits. Accumulated over time, those gains could easily surpass annual UK GDP. Success in levelling up is about growing the economic pie, everywhere and for everyone, not re-slicing it.

The United Kingdom's Geographical Disparities: Drivers and Potential Policy Approaches What does the economic and social geography of the United Kingdom look like? The UK has larger geographical differences than many other developed countries on multiple measures, including productivity, pay, educational attainment and health. Urban areas and coastal towns suffer disproportionately from crime, while places with particularly high levels of deprivation, such as former mining communities, outlying urban estates and seaside towns have the highest levels of community need and poor opportunities for the people who grow up there. These disparities are often larger within towns, counties or regions than between them. They are hyper-local and pockets of affluence and deprivation may exist in the same district. Indeed, many of the worst areas of deprivation are found in the UK's most successful cities. While change is possible, in some cases, these differences have persisted for much of the last century. And some of the UK's most successful cities – such as Birmingham, Manchester, Leeds, Glasgow and Cardiff – lag behind their international comparators when it comes to productivity and incomes. What are the current and future drivers of geographical disparities? Over the past century, many trends have combined to create the spatial patterns seen across the UK today. Globalisation, technological progress, advances in transport, logistics and power, and the shift from heavy industry to knowledge-intensive sectors, as well as the rise of foreign holidays and shift from technical training to university

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education, have had a large and lasting impact on the economic geography of the UK. These dynamics of the global economy have benefited the UK overall, improving productivity, increasing wealth and driving up living standards through more innovation and competition. These dynamics, however, have not had the same positive economic and social impacts across the UK. While London and much of the South East have benefited economically, former industrial centres and many coastal communities have suffered. This has left deep and lasting scars in many of these places, damaging skills, jobs, innovation, pride in place, health and wellbeing. What are the factors that will help drive levelling up? Levelling up requires a focused, long-term plan of action and a clear framework to identify and act upon the drivers of spatial disparity. Evidence from a range of disciplines tells us these drivers can be encapsulated in six "capitals".

- Physical capital – infrastructure, machines and housing.
- Human capital – the skills, health and experience of the workforce.
- Intangible capital – innovation, ideas and patents.
- Financial capital – resources supporting the financing of companies.
- Social capital – the strength of communities, relationships and trust.
- Institutional capital – local leadership, capacity and capability

This White Paper sets out that the new policy regime is based on five mutually reinforcing pillars. Firstly, the UK Government is setting clear and ambitious medium-term missions to provide consistency and clarity over levelling up policy objectives. These missions will serve as an anchor for policy across government, as well as catalysing innovation and action by the private and civil society sectors. These missions are ambitions that the UK Government has for all parts of the UK. Delivering on them, while being fully respectful of the devolution settlements, will require close and collaborative work with the devolved administrations. The missions are rolling decade-long endeavours and will be reviewed periodically by the UK Government. One mission relates to:

"Digital Connectivity Mission: By 2030, the UK will have nationwide gigabit-capable broadband and 4G coverage, with 5G coverage for the majority of the population" (my emphasis).

The White Paper notes the pivotal role that 'Digital Connectivity' has in boosting productivity, pay, jobs, and living standards by 'Growing the Private Sector'.

To help drive these improvements, the UK Government is setting four core missions, spanning living standards; research and development (R&D); transport infrastructure; and digital connectivity.

Para. 3.2.4 of the White Paper states 'By 2030, the UK will have nationwide gigabit-capable broadband and 4G coverage, with 5G coverage for the majority of the population. This mission is focused on improving digital connectivity'.

The case for 'Digital Connectivity' action states:

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'The COVID-19 pandemic demonstrated the importance of digital infrastructure right across society, from ensuring business continuity to reducing isolation. Improved digital connectivity has the potential to drive growth and productivity across the UK and widen job opportunities through remote working. However, there are significant spatial disparities in the quality of broadband and mobile networks, with rural areas likely to experience worse digital connectivity than urban areas. Infrastructure is only part of the picture: economic benefits will only materialise if businesses and workers have the skills to take advantage of improved infrastructure.'

More broadly, high quality digital infrastructure can deepen local labour markets through remote working, making it more attractive for both workers and companies to locate regionally. It also allows for the development of high-value sectoral clusters, which can drive growth and jobs in new areas. Existing specialisms in the UK regions have the potential to generate strong tech clusters, such as fintech in Scotland and Wales, e-Commerce in the North West and Northern Ireland, and Agri-Tech in Yorkshire and the Humber. The sector also provides opportunities for raising living standards – median earnings for the sector are 50% higher than the UK average.'

The policy programme for 'Digital Connectivity' states:

'In 2020, the UK Government published the National Infrastructure Strategy, committing to providing £5bn in public funding to roll out gigabit broadband to at least 85% of the country by 2025, and subsequently to as close to 100% as possible, working with the private sector. Public investment will target premises that are hardest to reach and which would otherwise not be provided for by the private sector, ensuring no areas are left behind. Gigabit coverage has increased from 10% to over 60% in less than two years. Since 2019, coverage has improved across the UK, and the UK Government anticipates the following additional improvements to be delivered as a minimum by 2025.'

The UK Government has also agreed a £1bn deal with mobile operators to deliver the Shared Rural Network programme. This will see operators collectively increase 4G coverage to 95% by 2025. As a result of this collaboration, the vast majority of the UK will soon benefit from improvements to digital connectivity.'

5G has the potential to radically change the way people live and make businesses more productive and competitive. *The UK Government's ambition is for the majority of the population to have access to a 5G signal by 2027. Since 2017, the UK Government has provided £200m in funding for 5G Testbeds and Trials, supporting over 200 startups and SMEs across a range of sectors – including healthcare, manufacturing, Agri-Tech and creative industries – to better understand how to use the technology to develop new solutions and services (emphasis added).'*

In 2022, the UK Government will publish the Wireless Infrastructure Strategy. This will review how far the private sector will go to deliver wireless infrastructure – including 5G – across the country, and determine whether there are any market failures in places that need to be addressed, and how the UK Government could tackle these.'

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The West Midlands 5G (WM5G) Testbed started in 2018 with the mission of testing and proving the benefits of 5G to public and private sector productivity, creating jobs and boosting growth. The UK Government has invested £21m over three years, alongside investment from local government and the private sector. By working with local authorities and Mobile Network Operators (MNOs), WM5G has accelerated 5G deployment by over six months, resulting in the West Midlands being amongst the best connected places for 5G in the UK. In addition, WM5G has delivered a number of UK firsts, including a 5G road sensor network, 5G connected ambulance and capsule endoscopy trials, and a 5G application accelerator programme called 5sprinG, which has already upskilled over 400 organisations on the benefits of 5G and allowed over 60 startups to develop new 5G products and services. We must ensure that people have sufficient digital skills to reap the benefits and prosperity arising from the digital economy. In 2020, the UK Government introduced a new digital skills entitlement, giving adults with low or no digital skills in England free access to new digital skills qualifications based on employer-supported national standards. The UK Government continues to work with local leaders to develop Local Digital Skills Partnerships. These collaborative partnerships are now operating in seven regions across England, with an eighth formally launching in Hull and East Yorkshire in early March. The UK Government will work with devolved administrations to consider how best to share the insights and evaluation of the programme to help build digital skills capability across the UK'.

The current proposals will facilitate the development of an advanced broadband telecommunications infrastructure in line with National Government guidance contained within the NPPF which supports infrastructure especially where growth takes place. Maximising access and maintaining choice in telecommunications should enable people to maintain and enhance economic, social and civic connections. Universal accessibility to telecommunications is vital to help overcome isolation or exclusion of urban life. Accelerating the extension of new communications modes should help to avoid new pockets of exclusion developing.

Further to the Government's commitment to improve digital connectivity, on 04th April 2022 the new permitted development rights for telecommunication operators came into force (SI 2022 No.278). The Explanatory Memorandum to the Town and Country Planning (General Permitted Development) (England)(Amendment) Order 2022 confirms that 'permitted development rights have an important role to play in the planning system. They provide a more streamlined planning process with greater planning certainty, while at the same time allowing the local consideration of key planning matters through a light-touch prior approval process'.

Planning Issues

The main issues arising from this prior approval notification are whether the proposed replacement mast and cabinets due to their siting and appearance would result in harm and if so whether any perceived harm would be less than substantial and would be outweighed by the significant social and economic benefits associated with the continuation of existing

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service provision attributed to the proposal to enable sustainable development and growth across the borough and meeting the needs of its communities.

The provisions of the GPDO require the local planning authority to assess the proposed development solely on its **siting and appearance**.

The principle of development has been established by the Government when the new permitted development rights came into force in November 2016 and again in April 2022, which enables sites such as this one to be built, with prior approval for siting and appearance being the only matters that the local planning authority can take into consideration.

Planning Practice Guidance explains how a prior approval application differs from a planning application at paragraph 28. It states that:

'The statutory requirements relating to prior approval are much less prescriptive than those relating to planning applications. This is deliberate, as prior approval is a light-touch process which applies where the principle of the development has already been established (emphasis added). Where no specific procedure is provided in the General Permitted Development Order, local planning authorities have discretion on what processes they put in place. It is important that a local planning authority does not impose unnecessarily onerous requirements on developers, and does not seek to replicate the planning application system' (emphasis added).

The Planning Portal also provides Application Type Guidance. This guidance states that:

'Certain forms of telecommunication development, for example, mobile telephone masts, are known as 'permitted development' and subject to prior approval from the local planning authority. The prior approval procedure means that the principle of development is not an issue. The LPA can only consider the siting and appearance of the proposal'.

Siting

The siting of the proposed radio base station has been carefully considered. To this end, the equipment has been located at the back of the footpath on Droylsden Road. The base station will be viewed in the context of streetlighting columns, road signage, traffic signals and commercial signage. This is in line with the NPPF and policies JP-P1 and JP-C2 of the Joint Development Plan and DM1 of the Core Strategy.

There are a number of vertical structures within the area, which will help the installation assimilate with its immediate environment including streetlighting columns, road signage, traffic signals and commercial signage. These vertical structures are similarly designed i.e. to be simple, functional vertical structures. These factors will help the column and associated cabinets from appearing prominent in the street scene. Consequently, the visual impact of the proposed radio base station will be minimised within the street scene and restricted to the immediate vicinity. This is in full accordance with policies JP-P1 and JP-C2 of the Joint Development Plan and DM1 of the Core Strategy.

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The operator's equipment cabinets are similar to those in the immediate vicinity of the site and other statutory undertakers which are commonplace in urban areas. Technical issues have arisen at the build stage which prevent the scheme from being built as per the approved scheme. Openreach have laid an expanded inspection chamber and equipment cabinet to support their fibre network in the middle of our clients approved development area. However the reduced in number of cabinets proposed and their limited height and scale will ensure that these cabinets will not be detrimental to the visual amenity of the area, nor have a detrimental impact on any pedestrian traffic on the footway. They will be finished fir green although they can be painted any colour the LPA wish.

In line with the requirements of the NPPF and policy JP-C2 of the Joint Development Plan, there are no existing telecommunications installations for the operator to share, that would provide the necessary coverage to the target coverage area. Similarly, there are no buildings which are suitable and available that the operator could utilise to operate their equipment. The discounted options are set out above and their reasons for being discounted are fully explained.

The transmission dishes are essential to provide a link into the operators' network. It requires a clear line of sight and therefore needs to have a centre line of height of 14.69m.

Appearance

Cornerstone has carefully considered the design of the new proposed column and are proposing the most sensitive design currently available to provide the necessary coverage and capacity to the surrounding area. Due to all the technologies that will be available at this location, 2G, 4G and 5G, 6 antennas need to be installed at the top of the slim-line monopole. Due to the advancement in technology since the previous approval on site the pole type has been updated to meet the clients requirements. The monopole remains in the same location as approved but the pole type is proposed to be amended from a 20m high Hutchinson Apollo A12V2 Streetpole to a 20m high Hutchinson engineering M-Range G_506 Streetpole. The antennas will replace the existing 2G and 4G service provision currently being provided at the existing site. If the column were to be any lower, the antennas would not be able to operate effectively and provide the level of coverage required.

In order to reduce the visual impact on the surrounding area the antennas are proposed to be tight to the top of the column, rather than on an open head frame which would appear more prominent in the street scene. Therefore, the operator has compromised on optimising the coverage in this area of Failsworth in order to minimise the environmental impact. However, meaningful coverage will still be provided to the target coverage area, hence the submission of this prior approval application in this location to maintain high quality indoor 2G and 4G service provision and new 5G services to be linked into the operator's network configuration.

The presence of the linear structures including the lighting columns, traffic signals, commercial signage and road signage will ensure that the proposed column will not appear incongruous

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within the street scene. Thus, there will be no detrimental loss of visual amenity to the area or environmental intrusion in line with the NPPF and policies JP-P1 and JP-C2 of the Joint Development Plan and DM1 of the Core Strategy.



Image 5: View of the application site looking north along Droylsden Road (Source: Google Streetview)



Image 6: View of the application site looking south along Droylsden Road (Source: Google Streetview)

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The telecommunications mast is proposed to be a slim-line simple, vertical, functional structure. The column is relatively slender and is similar in design to the other vertical structures in this area of Droylsden Road, albeit taller in height. As a result, this installation will not appear incongruous within the street scene in line with the requirements of the NPPF and policies JP-P1 and JP-C2 of the Joint Development Plan and DM1 of the Core Strategy.

It is accepted that the height of the proposed installation is taller than other linear structures, but this in itself is not a valid reason to conclude that it is not appropriate at a specific location. Indeed, Inspectors at appeal have noted that by their very nature to be effective masts are required to be taller than surrounding structures.

There have been numerous appeal decisions where the Inspector has attached significant weight to the benefits, alternative options, technical constraints and NPPF in a balancing exercise of all the valid material considerations, including visual impacts and the impact on residential amenity.

In determining APP/U4610/W/17/3186745 Outside the Painted Lady, Longfellow Road, Church End, Coventry, CV2 5HL the Inspector noted that whilst *'the pole would contrast with its surroundings due to its height, I consider that the harm to the street scene resulting from the development as a whole would not be greater than moderate. Balanced against that harm is the need to boost the capacity of the networks in the area including superfast 4G'*. The Inspector concluded at Paragraph 8 *'I consider the benefits of a high-quality communications network facilitated by the proposed development of the site, outweigh the moderate harm the installation would cause to the appearance of the area.'*

To suggest that it is inappropriate development because it is taller than adjacent lighting columns is no more relevant than suggesting that street lighting columns are inappropriate because they are taller than road signage or traffic lights. They are all essential pieces of infrastructure within a street scene that carry out differing functions and therefore cannot be considered on the same merits. Should a street lighting column be capable of the provision of high quality 2G/4G/5G telecommunication services then this would be a reasonable consideration, but this is clearly not the case. As such, the proposal should not be considered negatively due to it being taller per se than other vertical structures. Reasonable consideration of the proposal in the context of nearby street furniture can only conclude that the presence of other vertical structures in the immediate area only seeks to provide a setting wherein a base station may appear more congruous from which to provide an important service to a wider area.

The proposed height at 20m is essential in order to provide equivalent replacement coverage to the target coverage area of Failsworth and the wider area.

The equipment cabinets are designed to appear like other statutory undertakers equipment cabinets found within the vicinity of the site in urban areas across the country. They are small for telecommunications equipment. The proposed equipment cabinets are the least amount of cabinets that can be installed in this location and enable the radio base station to operate. If the number of cabinets were to be reduced, then there would not be sufficient room to

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house all the operators' equipment. In any event, these cabinets are permitted development under the operators' permitted development rights, with no prior approval or planning consent required. In order to help blend in with their surroundings they are proposed to be coloured fir green, although they can be coloured any other colour that the council considers to be appropriate.

The design of the radio base station is one of the most sensitive designs available to Cornerstone, designed to resemble typical existing urban linear street furniture. This is in line with the requirements of NPPF which supports equipment which is sympathetically designed and camouflaged where appropriate [paragraph 120], as well as the aspirations of the Joint Development Plan and Core Strategy.

Lack of Coverage – Material Consideration

The proposed installation is significant to enable continuous coverage of the telecommunication network, ensuring that Droylsden Road and the wider area continues to get the mobile coverage it needs. The current proposals will facilitate the development of an advanced broadband telecommunications infrastructure in line with National Government guidance contained within the NPPF which supports infrastructure especially where growth takes place.

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.

Without this replacement radio base station the operators' customers would experience increasing numbers of dropped calls and buffering unable to access the internet on their handheld devices.

The proposed replacement radio base station is in full conformity with the NPPF, the Core Strategy and the Joint Development Plan. The proposals will promote the enhanced connectivity of the area, by providing infrastructure for high speed telecommunications. Indeed, high quality telecommunications is often seen as the fourth utility service.

The proposed replacement installation will help improve the area's economic prosperity, strengthen the urban economy by supporting local businesses to start, grow, adapt and diversify. It will support a better environment for today and tomorrow by reducing the need to travel and in turn minimise carbon emissions. The radio base station will support the delivery of healthcare provision and accessibility by enabling people greater access to online services, NHS appointment reminders, reminders to take medicines, make appointments etc.

Economic and Social Benefits

The NPPF strongly supports sustainable development, as does the Joint Development Plan and Core Strategy. Mobile communication plays a significant role in sustainable development. Being able to access the internet via a mobile device allows people to access

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a wide range of central and local government services buy groceries, manage finances, apply for jobs/university, and carry out school projects, send emails, download applications, send and receive instant messages, participate in social media, streaming and downloading data to name just a few of the benefits of being able to use an internet enabled handheld device. It also allows people to work from home or on the move without needing to return to the office. Residents and businesses will enjoy better accessibility, assisting home-base working by improving the electronic means of communication and the roll-out of high-speed broadband helping to promote live-work development. This reduces travel time, carbon emissions and increases the speed in which information is processed/shared. The proposals therefore fully comply with NPPF and the Joint Development Plan and Core Strategy, as well as the Greater Manchester Digital Blueprint, Greater Manchester Strategy and the Infrastructure Framework.

In such instances, as described above, the NPPF supports development that improves the economic, social and environmental conditions in the area. Enhancing the 4G and 5G coverage and capacity in this area will fully meet this national policy objective.

Mobile connectivity is essential to the future success of the economy. Mobile connectivity is essential to creating a better society. Digital inclusion can help people gain employment, become more financially secure and improve health and well-being. Mobile connectivity is essential to fulfilling the potential of new technologies. Innovations such as artificial intelligence and connected cars will change how we work, spend our leisure time and run our public services.

There is a demand for mobile connectivity in areas where geography, logistics or economics – or a combination of all 3, make it difficult. Mobile network capacity needs to grow to meet the demand of mobile users, who are consuming ever increasing amounts of data.

Paragraph 39 of the revised NPPF states that:

'Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including...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'.

The social and economic benefits are a significant material consideration which should be weighed against the visual impact associated with a radio base station in this location. HM Treasury outlined such benefits in its report *'Fixing the Foundations: Creating a More Prosperous Nation'* – July 2015. Paragraph 7.1 of the plan stated that reliable and high quality fixed and mobile broadband connections support growth in productivity, efficiency and labour force participation across the whole economy. They enable new and more efficient business processes, access to new markets and support flexible working and working from home.

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Paragraph 7.2 goes on to highlight strong support for high quality communications infrastructure. It states:

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

The Government recognises that widespread coverage of mobile connectivity is essential for people and businesses. People expect to be connected where they live, work, visit and travel. That is why the Government is committed to extending mobile geographical coverage further across the UK, with continuous mobile connectivity provided to all major roads and to being a world leader in 5G.

Further to the Government's commitment to improve connectivity, new permitted development rights have come into force for telecommunication operators, designed to lift the restrictions on mobile operators such is the significance and weight the Government place upon the benefits attached to modern connectivity.

A National Needs Assessment – A Vision for UK Infrastructure was also published in October 2016 ([https://www.ice.org.uk/getattachment/media-and-policy/policy/national-needs-assessment-a-vision-for-uk-infrastr/National-Needs-Assessment-PDF-\(1\).pdf.aspx](https://www.ice.org.uk/getattachment/media-and-policy/policy/national-needs-assessment-a-vision-for-uk-infrastr/National-Needs-Assessment-PDF-(1).pdf.aspx)). It sets out the infrastructure needs for the UK which includes the importance of digital technology. An extract of this assessment can be found below:

'A lack of digital connectivity has a detrimental effect on business operations, productivity and output and hence competitiveness in the global market place. Securing digital connectivity is thus critical to the UK's long term prosperity. A key challenge for the digital sector is a persistent digital divide between those who have access to the latest technologies and those who do not, with resulting social and economic exclusion, particularly as dependence on e-services and digital communications increases'

The Assessment goes on to note that 'Universal digital connectivity would serve as an equaliser of economic opportunity in that it enables participation in a modern digital economy'. Therefore this Needs Assessment further explains the consequences of a lack of coverage and the effects this has on social and economic prosperity. This clearly highlights the importance of maintaining and enhancing high quality 2G and 4G coverage and capacity, as well as new 5G service provision in Failsworth where the social and economic benefits will outweigh the environmental considerations.

The Government's continued strong support for connectivity is further evidenced by the DCMS who launched their UK wide Digital Connectivity Portal on 20 December 2018. The Digital connectivity portal provides guidance for local authorities and network providers on

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improving connectivity in local areas. The Government wants everyone in the UK to benefit from world-class connectivity no matter where they live, work or travel. The Future Telecommunications Infrastructure Review outlines a package of measures to create the right market and policy conditions to deliver world-class connectivity for citizens and businesses. As a result, the pressure to provide a replacement radio base station in Failsworth to provide 2G and 4G and new 5G services is significant.

The proposed installation in this location will allow the operator to provide new and improved high quality 2G and 4G coverage and capacity and new 5G services. This fully meets the aspirations of the NPPF and policies JP-P1 and JP-C2 of the Joint Development Plan and DM1 of the Core Strategy.

There have been numerous appeal decisions where the Inspector has attached significant weight to the benefits, alternative options, technical constraints and NPPF in a balancing exercise of all the valid material considerations, including visual impacts.

The issue of benefits and a planning balance was also considered in Appeal Ref: APP/L1765/W/18/3197522 Land at junction of Andover Road and Athelsan Road, Winchester. The proposal related to the installation of a 17.5m street works pole and associated equipment cabinet at land at the junction of Andover Road and Athelstan Road, Winchester.

The Inspector found at Paragraph 9 *'The Government places a high priority on the provision of high-quality communications. The National Planning Policy Framework (the Framework) at Paragraph 112 states, "Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections". In this instance, the proposal is not so much seeking to provide significantly higher standards but to maintain recent local provision of 2G, 3G and 4G services as a result of a notice to quit from a nearby site that was providing these services. The Council has commented that service provision would be 'adequate' without the proposal, but the appellant has an obligation to provide not only appropriate coverage but also capacity for the network. I attach significant weight to the public benefit arising from the continuation of local service provision'*.

In March 2020, the decision of Birmingham City Council to refuse planning permission for a proposed telecommunications upgrade was overturned by the Planning Inspectorate (APP/P4605/W/19/324191). Within the decision notice, the Inspector stated:

'In this case, the proposed development would result in harm to the visual amenity of the area, with particular regard to the proposal's scale and siting.

As such, conflict would arise with Policy PG3 of the Birmingham Development Plan insofar as the development would not reinforce local distinctiveness with a design that responds to site's conditions and the context of the local area. However, I conclude that this harm would, on balance, be outweighed by the economic and social benefits that would stem from the proposed upgrade which would not be realised whilst reducing the height of the mast.

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Therefore, in the round, the proposal would accord with saved UDP Policies 8.55 and 8.55A-C, the SPD and Framework paragraphs 112 and 113. Collectively, these seek to support the expansion of shared next generation mobile technology to create a modern, high quality and reliable communications infrastructure that is essential for economic growth and the life of the local community'.

Practical Applications of 5G Connectivity as Example of Material Soci-Economic Benefit: -

Education:

The relationship between 5G and education is evolving at a massive rate with educators exploring the relevance of Virtual Reality (VR) technologies for education and training. Crucially, VR can support remote learning, allowing students a presence in the classroom even when working elsewhere.

5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high definition images and video), increased capacity and heightened security will also allow learning on the job, thanks to technologies such as Augmented Reality (AR) goggles, which can give engineers real-time instructions on how to fix a machine on a production line, for example.

Health:

Patients across the country are now becoming accustomed to relying on remote healthcare services such as NHS 111, virtual GP appointments, and ordering online deliveries of essential medical supplies.

5G will prove critical in providing the infrastructure required to deliver remote health services over the next decade. By design, 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high definition images and video), increased capacity and heightened security are going to be fundamental in scaling the patient benefits of remote healthcare and keeping medical records secure and private. For instance, trials have shown that connecting ambulance crews to expert resources using 5G allows paramedics to work with doctors and conduct specialist procedures in real time whilst on the road.

Summary

Cornerstone is in the process of progressing a suitable replacement site in the Failsworth area for a radio base station to ensure reliable mobile digital connectivity is maintained for residents, businesses and visitors. As part of Vodafone's continued network improvement program, there is a specific requirement for a replacement installation at this location to provide equivalent and improved 2G and 4G coverage and capacity, as well as new 5G service provision ensuring that this area of Failsworth maintains access to the latest technologies.

This prior approval application follows the previous approval on site (ref: 138669/TEL/2023) for a 20m monopole. Technical issues have arisen at the build stage which prevent the scheme from being built as per the approved scheme. Openreach have laid an expanded inspection

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chamber and equipment cabinet to support their fibre network in the middle of our clients approved development area.

This revised scheme therefore is for an amendment to the site layout and the proposed monopole type as required by the clients. The equipment cabinets proposed have been slightly relocated and the number of cabinets has been reduced from 5 as approved to 4. The number of proposed transmission dishes has been reduced from 2 to 1. Finally the monopole remains in the same location as approved but the pole type is proposed to be amended from a 20m high Hutchinson Apollo A12V2 Streetpole to a 20m high Hutchinson engineering M-Range G_506 Streetpole.

The proposed height at 20m is essential in order for the antennas to clear the surrounding clutter and be able to reach the target coverage area, to maintain and provide new high quality 4G and 5G service provision to Failsworth and the wider surrounding area. This will fully meet the national Governments aim of '*ensuring that everyone is connected to the information superhighway*' and the national policies set out in the NPPF. If the height of the column were to be reduced then the antennas would not be able to operate effectively, leading to a degraded service for the operators' customers especially for the higher frequency technologies including the latest 4G & 5G technologies.

Site selection was progressed in accordance with the applicant's licence obligation, advice in the NPPF and the Code of Practice and represents the least environmentally intrusive, technically suitable, available option.

The social and economic benefits of providing continued reliable and high quality mobile broadband connections including sustainable growth meeting the needs of the population and strengthening global competitiveness. This is fully supported by the NPPF, the Core Strategy and the Joint Development Plan. These benefits are strong material considerations which outweigh any perceived loss of visual amenity to the surrounding area.

Confirmation that submitted drawings have been checked for accuracy

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Signed:	<u><i>RGormley</i></u>	Date:	<u>28/08/2025</u>
Position:	<u>Town Planner</u>	(on behalf of	
		Cornerstone)	

In the first instance, all correspondence should be directed to the agent.

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