**SUPPLEMENTARY INFORMATION**

1. Site Details

| | | | |
|---|---|---|---|
| Site Name: | Bruntwood York House | Site Address: | Rooftop at Bruntwood York House, West Moseley Street, Manchester, M2 3BB |
| National Grid Reference: | E: 384115<br>N: 398220 | | |
| Site Ref Number: | 66129 | 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:<br><br>Upgrade of an existing site. | | |
| Were industry site databases checked for suitable sites by the operator: | Yes | |
| If no explain why:<br><br>N/A | | |

**Site Specific Pre-application consultation with local planning authority**

| | |
|---|---|
| Was there pre-application contact: | Yes |
| Date of pre-application contact: | 26/06/2025 |
| Name of contact: | N/A |
| Summary of outcome/Main issues raised:<br><br>A pre-application consultation letter was sent to the Local Planning Authority, along with a copy of the proposed plans, by email on 26/06/2025.<br><br>No response received to date. | |

[1] Macro or Micro

**Annual area wide information to planning authority**

| | |
|---|---|
| Has annual area wide information been provided? | No |
| If no explain why: | |
| Summary issues raised:<br><br>N/A | |

**Community Consultation**

| | | | |
|---|---|---|---|
| Rating of Site under Traffic Light Model: | ~~Red~~ | ~~Amber~~ | **Green** |
| Outline of consultation carried out:<br><br>Pre-consultation letters and a set of plans were sent to Ward Councillors Anthony McCaul, Joan Davis and Marcus Johns, by email on 26/06/2025. | | | |
| Summary of outcome/main issues raised (include copies of relevant correspondence):<br><br>No responses received to date. | | | |

**School/College**

| |
|---|
| Location of site in relation to school/college (include name of school/college):<br><br>None in proximity in line with Code of Practice. |
| Outline of consultation carried out with school/college (include evidence of consultation):<br><br>N/A |
| Summary of outcome/main issues raised (include copies of main correspondence):<br><br>N/A |

**Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation (only required for an application for prior approval)**

| | | |
|---|---|---|
| Will the structure be located within a civil safeguarding/defence safeguarding area? | | N/A |
| Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified? | | N/A |

| |
|---|
| Details of response:<br><br>N/A – full planning application |

**Developer's Notice**

| | | |
|---|---|---|
| Copy of Developer's Notice enclosed? | | No |
| Date served: | N/A - Full Planning application. Relevant ownership certificates sent to relevant parties on 14/10/2025 | |

3. Proposed Development

| |
|---|
| The proposed site: |
| KTL act on behalf of the mobile telecommunications operator EE Ltd. The proposal is to upgrade an existing radio base station, in order to provide high quality new 5G technology.<br><br>As part of EE's continued network improvement program, this site has been identified as one which is struggling to cope with extra demands on the network as more people use internet enabled handheld devices in this area. For this reason, the site is required to be upgraded, to allow it to cater for the additional capacity. This ensures that coverage and capacity requirements are maintained and enhanced and customer experiences are improved.<br><br>Mobile telecoms networks are now ubiquitous throughout the UK. It is an expectation that an individual can connect and use their mobile phone whenever and wherever they are.<br><br>This site will enable high quality upgraded 5G services to be provided to this busy area of Manchester city centre. The Government recognises that widespread coverage of mobile connectivity is essential for people and businesses. 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 the latest mobile technologies. This will allow everyone in the country to benefit from the economic advantages of widespread mobile coverage.<br><br>The demand for mobile data in the UK is increasing rapidly, and as households and businesses become increasingly reliant on mobile connectivity, the infrastructure must be in place to ensure supply does not become a constraint on future demand.<br><br>The existing site is located on and around the rooftop at York House, West Moseley Street. The existing antennas provide coverage to the area for EE and H3G. There is also third-party operator equipment on the building which provides coverage for VMO2 and Vodafone. Ancillary equipment including existing ERSs and BOBs (Ericsson Radio Systems and Break Out Boxes), and a GPS node are fitted to existing poles. There is also an existing equipment cabin located on grillage on the rooftop. |

There is a long history of applications to upgrade the existing equipment for all of the operators. The applications which are available to view on Public Access have all been approved (LPA references 079890/FO/2006/C1, 082858/FO/2007/C1, 100353/FO/2012/C1, 102310/FO/2013/C1, 129430/FO/2021, 134235/FO/2022). There is also a current application running for the upgrade of the existing third party operator equipment on the rooftop (LPA reference 143894/FO/2025). The current proposal is also for the upgrade of the existing site.

The application site is located at York House, and is a building of 11 storeys used for commercial purposes. The host building is not listed but lies within the Upper King Street Conservation Area and is in proximity to listed buildings including the Grade II* Royal Bank of Scotland (to the southeast) and the Grade II* Estate Exchange (to the northwest).



**Image 1a: The application site**

The wider surrounding area comprises predominantly of office space as well as other urban uses such as retail and food/drink establishments, which is owed to the site's central location within Manchester city centre. The host property and surrounding buildings are relatively tall but with slight height variations, thus creating a unique roofscape that is not readily visible from ground level views. The proximity and height of these adjacent buildings provides a degree of visual screening along the neighbouring road network towards the telecommunications equipment that aids their assimilation into the surrounding area as a result. A high level of footfall is experienced throughout the day in this area, which is further signified by the proximity of popular thoroughfares such as Market Street and the nearby transport routes for tram, bus and train travel.

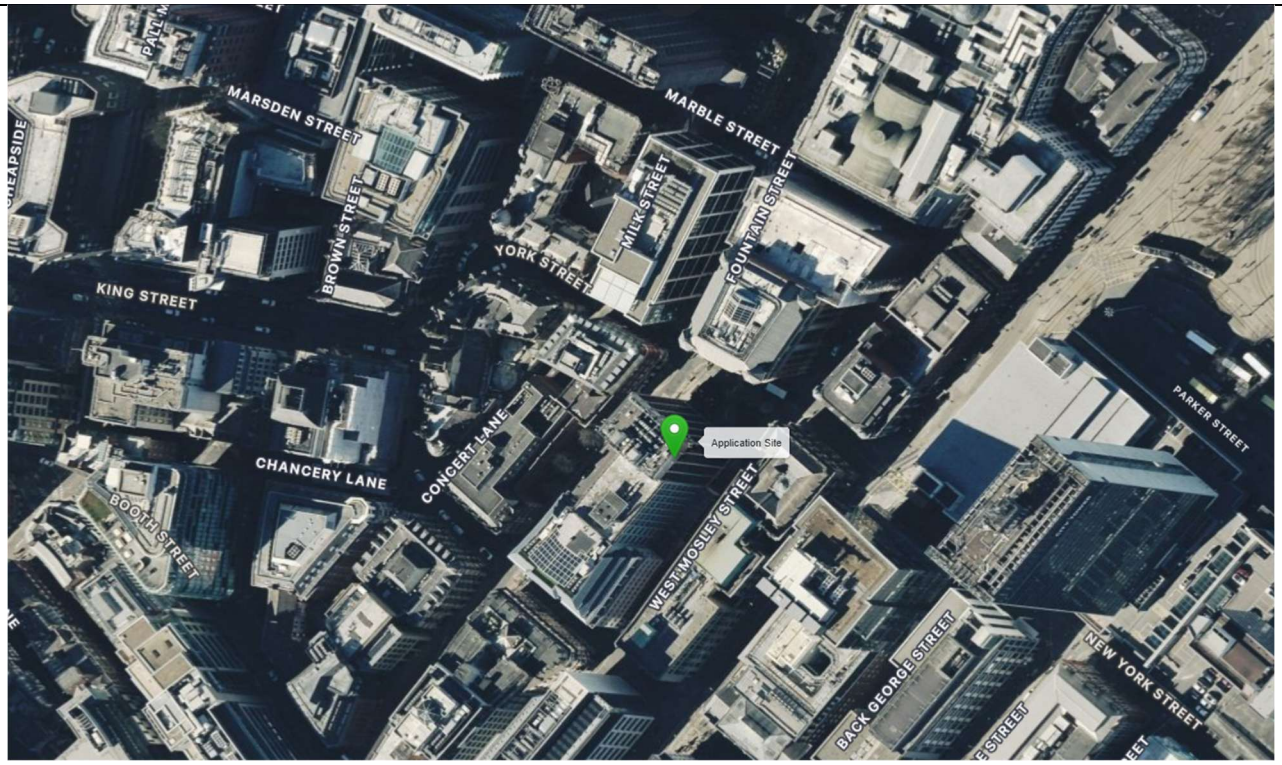



**Image 1b: Aerial view of the application site (Source – Grid Reference Finder)**

The existing equipment currently provides 2G (for EE) and 4G coverage to the surrounding area for EE and H3G. There is a need to provide 5G coverage to this area of Manchester city centre, to ensure that customers have access to the latest, high quality technologies. The proposed upgrade is also in accordance with NPPF which states that planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology such as 5G (para. 119).

3 no. additional antennas are required on the rooftop. These antennas will be located on new support poles which will be bracketed off existing support poles. It is also proposed to remove and replace 3 no. existing antennas with upgraded antennas, in order to provide upgraded 4G coverage and capacity. The replacement and additional antennas will be face mounted to the building as per the existing, at heights of approximately 39 metres AGL.

The proposal is for the upgrade of an existing telecommunications site which is already an established feature on the building and within the wider streetscene. Whilst the proposed antennas will be visible from public vantage points, the height of the building means that the equipment is out of the natural eyeline of passersby at ground level. The replacement and additional antennas do not punctuate the skyline and will be viewed in the context of the existing equipment already in situ on the rooftop, against the building faces.

To further ensure that the proposed antennas are not visually apparent, they will be painted to match the exterior tiling façade as per the existing.

EE switched off their 3G network in January/February 2024 and are now in the process of upgrading their sites where necessary to ensure they are capable of providing sufficient 2G/4G coverage, and 5G coverage where required.

As stated above, the existing site has been in situ on this rooftop in this busy part of Manchester for a number of years and it is an established part of the operator's network. The operator has identified a need to upgrade the existing site in order to ensure that the surrounding area is able to benefit from high quality 4G/5G coverage and capacity.

**Designations**

The application site is located within the Upper King Street Conservation Area. To this end, a Heritage Impact Assessment is in production and will be forwarded to the Local Planning Authority as soon as possible as part of the application's supporting documentation.

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

The operator is seeking to upgrade their existing network in this area of Manchester, to ensure high quality customer experience is obtained as demands on the network increase and technologies change. The operator has identified a need to roll out the latest 5G technologies to the area. The proposal will achieve this.

The proposed enhanced 5G technology 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.

The site will allow EE/BT to provide upgraded 5G coverage and capacity to this busy part of Manchester.

Type of Structure *(e.g. tower, mast, etc): Pole mounted antennas*

Description:

The removal and replacement of 3 no. existing antennas with 3 no. upgraded antennas, the installation of 3 no. additional antennas, and ancillary development thereto.

| | |
|---|---|
| Overall Height: | 39.85 metres to top of proposed antennas |
| Height of existing building *(where applicable):* | Roof level 39.5 metres |
| Equipment Housing: Located internally within equipment cabin | |
| Length: | N/A |
| Width: | N/A |
| Height: | N/A |
| *Materials (as applicable):* | |
| Tower/mast etc – type of material and external colour: | Steel – painted to match exterior tiling façade |

| | |
|---|---|
| Equipment housing – type of material and external colour: | N/A |

| Reasons for choice of design, making reference to pre-application responses: |
|---|
| Central Government attaches great importance to the design of the built environment and outlines this within Section 12 of the NPPF. It states:<br><br>*"Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities."*<br><br>In keeping with the NPPF guidelines of using *"good design"* to provide *"high quality communications infrastructure"*, the proposed design has been selected to minimise visual impact on the surrounding environment and the heritage asset.<br><br>In this instance, the proposal is for the upgrade of an existing telecommunications site. The application site has hosted a telecommunications site for several years. 3 no. existing antennas will be removed and replaced to provide upgraded 4G coverage and capacity to the area. The 3 no. proposed antennas will allow the site to provide upgraded 5G coverage to the surrounding area.<br><br>The proposed antennas will be located on new steel support poles, bracketed off existing support poles which are fixed to the façade of the building. The proposed equipment will not be overly noticeable from public vantage points at ground level. In longer views, the rooftop is predominantly blocked from views by existing built form. In addition, the proposed painting of the antennas to match the tiling façade ensures that the visual impact of the proposal will not be unacceptable to either the amenity of the host building or the character of the conservation area.<br><br>The technical requirements of mobile communication operators such as the applicant are acknowledged in the NPPF, which states that local planning authorities should support the expansion of electronic communication networks.<br><br>One of the fundamental aspects of the NPPF is a reduction in the proliferation of sites. The proposal is for the upgrade of an existing site which utilises an existing building.<br><br>The proposed design is considered to be an appropriate solution, and shows the applicants efforts to help mitigate the proposal's impact on the visual amenity of the area as well as the preservation of the heritage asset. |

4. Technical Information

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

| | | |
|---|---|---|
| International Commission on Non-Ionizing Radiation Protection Declaration enclosed<br><br>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.<br><br>When determining compliance, the emissions from all mobile phone network operators on or near to the site are taken into account.<br><br>In order to minimise interference within its own network and with other radio networks, EE/BT operate their networks in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision<br><br>As part of EE/BT's network, the radio base station that is the subject of this application will be configured to operate in this way.<br><br>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.<br><br>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 | Yes | |

| | | |
|---|---|---|
| services or instrumentation operated in the national interest. | | |

5. 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 operators' 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.

There is a specific requirement to upgrade the existing site in this location to allow EE/BT to provide upgraded 5G services to this area of Manchester. This ensures high quality indoor service provision is provided.

The upgrade to the existing site is especially important in this location, given the increase in demands on the network as more people try to utilise their handheld mobile devices at once, as well as in response to the 3G switch-off.

6. 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)

In accordance with the licence obligations and advice in the National Planning Policy Framework and the 'Code of Practice for Wireless Network Development in England' the applicant's network rollout team investigated the following siting and design options using this sequential approach to site selection:

- **Upgrading their own existing base stations;**
- Using existing telecommunications structures belonging to another communications operator. i.e. **Mast and/ or site sharing**, co-location;
- **Installations on existing high buildings or structures;**
- **Using small scale equipment**; and finally Erecting a new ground based mast site (1st)

Camouflaging or disguising equipment. (2nd) A conventional installation e.g. a lattice mast and compound.

The applicant's site selection strategy is to keep the overall environmental impact to a minimum. Utilising existing masts is always progressed where it is technically and legally possible and where it is the local planning authority's preferred environmental solution. New sites are only developed where there are no viable or accessible alternatives or it is the local planning authority's preferred approach. The feasibility of the acquisition, build and maintenance of the site also needs to be taken into account.

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

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

The proposal is for the upgrade of an existing site, which is in full accordance with the sequential approach as set out in the NPPF and the Code of Practice. As the existing site at York House is able to be upgraded to provide upgraded 5G services to the surrounding area for the operator, no other options were investigated.

Land use planning designations:

The site is located within the Upper King Street Conservation Area.

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.

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

**National Planning Policy Framework (December 2024) (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:

"*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"* (emphasis added).

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:

*"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."*

The NPPF provides guidance on proposals affecting heritage assets. Paragraph 207 states that *"in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance."*

Paragraph 208 goes on to state that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset).

The NPPF continues to provide guidance on considering the potential impacts of development on heritage assets. Paragraph 212 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the assets' conservation. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Paragraph 215 retains advice provided in the 2012 version of NPPF relating to the degree of harm. It states that *"where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."*

Public benefits are defined within the NPPF and could be anything that delivers economic, social or environmental progress. Benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.

**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.

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 outs '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:*

- ***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.*
- ***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. 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**
- **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

**<u>Local Policy</u>**

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.

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 were 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:
- Enhance our cultural, heritage and educational assets.
- 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."

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.

Policy JP-P2 relates to Heritage. It states that development proposals affecting designated and non-designated heritage assets and/or their settings will be considered having regard to national policy.

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:

*"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 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:

- *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.*

Policy CC9 relates to Design and Heritage. It states that development in the city centre should preserve or enhance the heritage assets that have been identified, including conservation areas.

Policy EN3 relates to Heritage. It states that new developments must be designed to support the Council in preserving or, where possible, enhancing the historic environment, including the character, setting and accessibility of conservation areas.

**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.

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 forms 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 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.

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 met 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 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.

**UK Wireless Infrastructure Strategy: April 2023**

In April 2023, the UK Government published the 'UK Wireless Infrastructure Strategy', 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 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 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 is a whole.

**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.

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.

**Levelling Up the United Kingdom (February 2022)**

The Levelling Up White Paper set out how the Government will spread opportunity more equally across the UK.

Digital Connectivity is a focus area and the mission is '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 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.

<u>Digital connectivity: The case for action</u>

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 fntech 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.

**Planning Matters**

The following paragraphs set out how the proposed radio base station complies with the relevant local planning policy, and national planning policy guidance.

The main matter for consideration is whether the proposed upgrade of the existing telecommunications site would result in harm to the conservation area, and whether this perceived harm would outweigh the significant social and economic benefits associated with the increased service provision attributed to the proposal and other valid material considerations as outlined within NPPF.

The proposed equipment fully complies with the objectives of the NPPF in regard to utilising existing telecommunications sites. Government guidance states that in order to limit visual intrusion, the number of radio and telecommunication masts and the sites should be kept to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used unless the need for a new site has been justified.

The proposal is for the upgrade of an existing site on an existing building, which is fully in line with Code of Practice and NPPF. The operator has identified a specific need to provide upgraded 4G and 5G coverage and capacity to this busy area within Manchester city centre. In order to deliver this, the operator has investigated its existing sites within the area and established that the proposed upgrade of the existing site will deliver its technical requirements.

The proposed replacement and additional antennas will be located on existing support poles, or bracketed off existing support poles, on the tiling façade at the top of the building, at a height of approx. 39 metres AGL. Due to the presence of existing built form, and the

proposed painting of the antennas to match the tiling façade as per the existing antennas already in situ, it is not considered that the proposed equipment will be overly noticeable from public vantage points at ground level. This ensures that the visual impact on the host building and the Conservation Area is minimised so far as practicable, in accordance with Policies JP-P2 and JP-C2 of the Places for Everyone Joint Development Plan, and Policies DM1, CC9 and EN3 of the Manchester Core Strategy DPD.

The telecommunications equipment forms an established part of the operators' networks and has been located at the application site for over 20 years. A Heritage Impact Assessment will be submitted in due course.

The proposed upgrade of the existing telecommunications site will enable EE/BT to provide upgraded 5G coverage and capacity in this part of Manchester city centre, in line with the NPPF. The operators' license obligations require them to meet customers' "reasonable demand". Reasonable demand would be to provide indoor coverage as customers expect to be able to use their handsets indoors. Ther operators also have a competitive market driven "requirement" to provide a high-quality service.

If permission were to be refused for this upgrade, the operator would have to seek a new site in the immediate vicinity to provide the required new 5G services to the surrounding area. This would lead to proliferation of sites, contrary to the NPPF and Code of Practice.

**Lack of Coverage – Material Consideration**

The proposed upgrade is significant to enable continuous coverage of the telecommunication network, ensuring that this area of Manchester gets 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 and the UK Wireless Digital Infrastructure Strategy, which support 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 upgrade, the operator's customers would experience increasing numbers of dropped calls and buffering unable to access the internet on their handheld devices.

The proposed upgrade is in full conformity with the aims of the Places for Everyone Joint Development Plan and Manchester Core Strategy DPD, as well as the Greater Manchester Digital Blueprint, the Greater Manchester Strategy 2021-2031, the Greater Manchester Industrial Strategy and the Greater Manchester Infrastructure Framework 2040. The proposals will ensure the improvement of high-quality communications infrastructure for the community, investing in improved community facilities which meet essential everyday needs, as important as gas and electricity. Indeed, high quality telecommunications is often seen as the fourth utility service.

The proposed upgrade will help improve the area's economic prosperity, strengthen the urban economy's 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.

**Balancing Exercise – Economic and Social Benefits**

The NPPF strongly supports sustainable development, as does the Places for Everyone Joint Development Plan and the Manchester Core Strategy DPD. Mobile communication plays a significant role in sustainable development. Being able to access the internet via a mobile device allows people to access 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, UK Wireless Digital Infrastructure Strategy, the Places for Everyone Joint Development Plan and the Manchester Core Strategy DPD to minimise the effects of climate change reducing the need to travel and therefore the carbon footprint.

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

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 38 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.

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.*'

Indeed, MPs have noted in parliament that the UKs Superfast Broadband connectivity was 'relatively poor' and businesses were losing out from patchy 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.

Further to the Government's commitment to improve connectivity, on 24th November 2016 the new permitted development rights for telecommunication operators came in to force, 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). 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 providing new high quality 5G coverage and capacity in Manchester 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 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 upgrade the existing telecommunications site in this area of Manchester to provide new and improved 5G coverage and capacity is significant.

The proposed upgrade in this location will provide new high quality 5G coverage and capacity, supporting the Government's aim of '*focusing on ensuring that everyone is connected to the information superhighway*'. This fully meets the aspirations of the NPPF, the Places for Everyone Joint Development Plan and the Manchester Core Strategy DPD.

Good connectivity allows people to access a wide range of essential services and a further explanation on some of these key benefits is provided below:

Economic benefits

- Creating more productive and cost efficiencies for businesses
- Businesses offering online services can extend their products to a broader audience
- Local areas and businesses can benefit from tourists and visitors as hotels, attractions, and restaurants can be booked online from anywhere in the world
- Business owners and services like doctors can provide a faster and more cost-effective service by offering both online appointments and ordering
- Digital connectivity facilitates economic growth, something which the Government is keen to progress and promote

Social benefit

- Mobile communications can help people to stay in touch wherever and whenever, which can help improve social wellbeing
- Convenient access to online commerce or businesses
- Contacting emergency services is easier, especially in remote areas
- Giving the ability to manage our personal finances and information 24/7
- Using a mobile wherever you go can provide better personal security

- Having access to social networking sites and applications can keep people entertained with their lifestyles and interests
- Access to real-time transport information or timetables
- Smart meter reads for utilities such as gas or electric
- Contacting local authorities
- Promotion of smarter and productive ways of working. For example, working from home can help minimise commuting which can provide better work and home life balance

Sustainability and Environmental benefits

- Facilitating remote access to services, education, and commerce, reducing the need to travel and in turn minimising carbon emissions.
- Better monitoring and control of energy consumption through climate change technology, smart metering and smart energy grids.
- Provision of smart technologies within the agricultural sector will facilitate more efficient and less wasteful practices helping to limit negative impacts.

Health benefits

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

Education benefits

- Facilitates access to educational establishment databases or booking systems for securing places for the likes of school dinners, field trips, extra-curricular activities, student/teacher reviews, etc.
- Provides access to school/college/university apps for setting and submitting homework/coursework, ensuring news and notifications are delivered efficiently, and for parent/student/teacher interactions.

On the 29th November 2024, Sir Chris Bryant MP wrote a letter to Council Leaders and Council Chief Executives across the UK in support of digital infrastructure deployment. This letter demonstrates that the Government still consider digital infrastructure to be a high priority.

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.

The letter points out that 'early participation from local planning authorities can speed up telecoms deployment' and urges Councils to have early and strategic discussions with mobile operators to move applications more quickly through the planning system and help improve mobile coverage and capacity. There is a specific ask in the MP's letter that Councils 'support the deployment of communications infrastructure wherever possible' .

The manufacturing, construction and agricultural sectors were hit particularly hard by the pandemic, and these would benefit significantly from improved connectivity. However, onerous planning rules and loopholes in existing legislation are slowing down the infrastructure upgrades needed to make the most of this mobile revolution in these much-needed industries.

The delay in gaining planning approvals for digital infrastructure is such that the Prime Minister, Sir Keir Starmer, wrote in The Times on 5th December 2024:

> *"Good homes need to be supported by good infrastructure… Every road, pylon* ***and mast*** *– which connect people to opportunity – must jump through endless hoops, only to be opposed, dragged out, before eventually, if lucky, approved."* [emphasis added]

The Government published the UK Infrastructure: A 10 Year Strategy in June 2025, and it was presented in Parliament by the Chief Secretary to the Treasury by Command of His Majesty. The Strategy highlights the benefits of effective digital technologies in 'Chapter 3: Unlocking growth across regions' under the subheading 'Digital Infrastructure for growth and innovation':

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

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

The proposed upgrade of the existing installation in this location will allow the operator to provide new 5G coverage and capacity to the Manchester area, supporting the Government's aim of '*focusing on ensuring that everyone is connected to the information superhighway*' and '*for the majority of the population to have access to a 5G signal by 2027*'. This fully meets the aspirations of the NPPF.

**Health and Safety**

The proposed installation conforms to current government planning guidelines regarding potential health effects arising from telecommunications development. The operator has attached a declaration that the site conforms to ICNIRP guidance. This is in full accordance with NPPF.

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

The publication of the National Planning Policy Framework continues to highlight the Governments view that the planning system is not the appropriate mechanism for determining health safeguards. It sends a clear message to local planning authorities stating that they must 'determine applications on planning grounds. They should not seek to prevent competition between different operators, question the need for the telecommunications system, or determine health safeguards if the proposal meets International Commission guidelines for public exposure'. This is reiterated in the Code of Practice.

**Summary**

EE/BT are in the process of upgrading their existing sites to ensure reliable mobile digital connectivity is provided on their network. As part of EE's continued network improvement program, there is a specific requirement to upgrade the existing installation at this location to provide new 5G services, ensuring that this area of Manchester has access to the latest technologies.

The proposal will fully meet the national Government's aim of '*ensuring that everyone is connected to the information superhighway*' and the national policies set out in the NPPF.

It has been demonstrated that the proposed scheme is in full accordance with the NPPF. Any perceived harm caused by the proposed upgrade would not outweigh the benefits of enhancing coverage and capacity and providing new community facilities, and that introducing new 5G communications network in this area would bring.

Site selection was progressed in accordance with the applicant's licence obligations, 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 reliable and high quality mobile broadband connections including 5G support growth in productivity, efficiency and labour force participation across the whole economy is a strong material consideration in the determination of this application. It is fully supported by the NPPF, the Places for Everyone

Joint Development Plan and Manchester Core Strategy DPD, as well as the Greater Manchester Digital Blueprint, the Greater Manchester Strategy 2021-2031, the Greater Manchester Industrial Strategy and the Greater Manchester Infrastructure Framework 2040. These benefits are strong material considerations which outweigh any perceived loss of visual amenity to the surrounding area or perceived harm to the heritage asset as set out above in the preceding paragraphs.

**We confirm that submitted drawings have been checked for accuracy.**

| | | | |
|---|---|---|---|
| Name: (Agent) | Vicky Weston MSc MRTPI | Telephone: | 07591 646 221 |
| Company: | Perry Williams on behalf of KTL | | |
| Company Address: | Unit 7C, Mayfield House, Lyon Road, Altrincham, Cheshire, WA14 5EF | Email Address: | vweston@perrywilliams.co.uk |
| Signed: | V. Weston | Date: | 14/10/2025 |
| Position: | Consultant Town Planner | (on behalf of EE/BT) | |