

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	NATIONAL CYCLING CENTRE	Site Address:	LAND APPROX 100M NORTH OF NATIONAL CYCLING CENTRE
National Grid Reference:	E: 387425 N: 398922		STUART STREET MANCHESTER M11 4TE
Site Ref Number:	30750200	Site Type: ¹	MACRO - STREETWORKS MONOPOLE

2. Pre Application Check List

Site Selection (for New Sites only)

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?		NO
If no explain why: The industry database is a more up-to-date source of information.		
Were industry site databases checked for suitable sites by the operator:	YES	
If no explain why: N/A		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	No
Date of pre-application contact:	N/A
Name of contact:	James Bridgman
Summary of outcome/Main issues raised: This application follows on from a recently withdrawn application (Ref: 142290/TEL/2025). Attempts to secure pre-application engagement on the revised location was sought during the previous determination discussions, but no formal comments were made.	

¹ Macro or Micro

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Annual area wide information to planning authority

Has annual area wide information been provided?	No
If no explain why:	
Summary issues raised: Cornerstones commercial relationship with VMO2 has changed, effectively increasing their independence to work with other companies in the deployment of mobile infrastructure. It means they no longer have visibility of VMO2's full update plan. However, Cornerstone is fully committed to working closely with Local Planning Authorities and following best practice guidance. We aim to engage and work with the planning department at the earliest opportunity from when we are instructed to deliver new infrastructure within your Local Authority area and often conduct strategic pre-rollout engagement meetings to discuss our wider rollout. If your Local Authority would like a meeting to discuss wider Cornerstone rollout plans then please advise. We recognise the importance of developing long term partnerships and will always work with you to deliver improved mobile connectivity.	

Community Consultation

Rating of Site under Traffic Light Model:		Amber	
Outline of consultation carried out: Consultations were undertaken with Clayton and Openshaw Ward Councillors, Lucy Powell MP, The National Cycling Centre and the following residents within 200m of the proposal: 63, 65, 67, 69, 71, 73, 75, 77, 79, 81, 83, 85, 89, 91, 93, 95 STUART STREET EAST, 80, 82, 84, 86, 88, 90, 92, 94, 96, 98, 100, 102, 104, 106, 110 STUART STREET EAST 99,97, 95, 93, 91, 89, 87, 85, 83 BANK STREET			
Summary of outcome/main issues raised: No correspondence has been received.			

School/College

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Location of site in relation to school/college: Prior to the submission of this application, pre-consultations were initiated with Ravensbury Street Primary School.
Outline of consultation carried out with school/college: Consultation letters and design drawings were issued to the school via email on 3rd February 2025
Summary of outcome/main issues raised: No response has been received.

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

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

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	28.08.2025	

3. Proposed Development

The proposed site: Government is committed to supporting investment in high-quality, reliable digital connectivity so that communities can benefit from faster economic growth and greater social inclusion. It is essential to keep pace with growing demand for internet bandwidth and mobile data from local businesses, residents and those who visit our communities.
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WHP Telecoms have been commissioned to act on behalf of Cornerstone for the proposal in front of you. As part of VMO2's continued network improvement program, in line with the operator's licence, there is a specific requirement to provide improved technical provisions, greater capacity, and coverage in the area as well as the introduction of new 5G technology.

Virgin Media O2 (VMO2) currently operates mobile network equipment from a shared greenfield lattice structure at the entrance to the Cycling Centre within the grounds of Norweb Sub station on Stuart Street. The Shared structure is a 15m lattice and currently hosts all four Mobile Network Operator's (MNOs) by way of MBNL (3UK and EE Ltd.) as well as Vodafone and VMO2 (please see figure 1 below).



(Figure 1: Street view of the existing shared installation)

To continue sharing the existing mast at this location a significant redevelopment would be required to a much more structurally robust mast capable of hosting all the equipment that is required for multi operator 5G technology. It is therefore likely that a 30m tower would be required to allow this upgrade to occur however, Manchester City Council previously assessed this scale and design (*under the application ref: 062527/FO/NORTH2/01*) and set a refusal precedent for the following reasons. The proposal at that scale would not be compatible with the regeneration proposals for East Manchester, would have an overbearing visual impact on the area and become a detrimental factor for residential amenity.

For full clarity, the increased tower height is required to comply with the more stringent ICNIRP exclusion zones that are associated with 5G technology. One must appreciate that this is further exacerbated by the cumulative EMF output from all four MNOs.

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Another requirement for the height increase is to allow sufficient radio output for all Operators while respecting the required separation distances, as outlined by Ofcom as industry regulators. The metal-clad sporting arenas pose a serious blocking influence to signal and at 20m, the installation is just peering above this. Physical separation between the antennas (both horizontal and vertical) are required to minimise the risk of electromagnetic interference between different operators' equipment, particularly where multiple systems are operating simultaneously across adjacent frequency bands. This ensures the clarity and integrity of signals and supports consistent network performance, without it, it would result in mutual interference, akin to multiple people speaking simultaneously in a room, making it impossible to understand each other. Such interference would hinder all Operators from delivering the required coverage and capacity in the target area, leading to issues such as buffering and dropped calls, creating a poor user experience for every customer in the cell.

For clarification, the operator has fully investigated the potential to upgrade the existing structure to provide the latest technologies for the VMO2 network. During the investigation, it has come to light that the current tower is operating at its maximum capacity, and the proposed installation of new equipment has failed the industry's structural check (Global Design Check (GDC)). It is therefore confirmed as being incapable of hosting the load bearing of the new required upgrade technologies therefore requiring a new structure. The existing structure will remain in place for the host operator MBNL (Three UK and EE Ltd) and Vodafone remaining. As VMO2 removes itself, the tower may have capacity to be upgraded for others, but that remains separate to this application.

Paragraph 69 of the *Code of Practice for Wireless Network Development in England* acknowledges that;

'Operators should seek to share sites where possible, site sharing reduces the number of sites required and network proliferation. However, site sharing means that masts must safely accommodate equipment for all technologies (2G- 5G) from multiple operators. Existing masts may be required to be strengthened or replaced with a larger, lattice-type structure. This may be desirable and more appropriate in rural areas, but less so in more urban environments, where greater densities of base stations will be required.'

Given this planning constraint and the strict license obligations imposed by Ofcom as industry regulators, the Operator's only other option is to propose a secondary, more slimline, monopole as a more appropriate and sensitive solution to 5G service provision whilst minimising impact for a street furniture setting.

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The Applicant acknowledges that the proposal may be perceived as contrary to Paragraph 120 of the NPPF, as it would increase the overall net gain in infrastructure. However, it is important to emphasise the specific wording of Paragraph 120, which recognises the need for additional masts to ensure the continued provision of services to consumers, the efficient operation of the network, and sufficient capacity for future expansion. Furthermore, Paragraph 120 makes clear that, where new sites are required—for example, to support 5G networks or enable connected transport and smart city applications—such equipment should be sympathetically designed and, where appropriate, camouflaged. The Applicant is firmly of the view that the proposal fully accords with the requirements of Paragraph 120 of the NPPF.

Paragraph 37 of the Code of Practice for Wireless Network Development in England reiterates this point when informing the reader that;

'New ground-based masts will sometimes be required to accommodate the ever-increasing coverage and capacity needs of the country. 4G and 5G are likely to require further network densification in order to meet growing customer demand for data.'

The new VMO2 installation is required to be sited next to the existing installation to ensure customer network coverage is continued and replicated and to provide new upgraded 4G technologies and a new 5G service but it must also respect the horizontal separation requirements as previously outlined. It has been placed in an area that will not lead to radio interference for the host operator or any nearby operator.

The specific proposal to address the cell coverage requirements comprises of 20m monopole, c/w 6no antennas, 1no. GPS Module, 3no. RRUs, 2no. 0.3m dishes, 2no cabinets and ancillary development thereto. The technical details of this proposal are illustrated within the enclosed application design drawings: - (CS 307502_TEF 23568_GA_Rev A Planning Drawings).

It is understood that the principle of telecommunication development at this location is acceptable (subject to appropriate siting and design measures) under the Town and Country Planning (General Permitted Development etc.) (England) (Amendment) (No. 2) Order 2023, which came into effect on 21st December 2023. In this location, Central Government allows a pole height up to 30m under prior approval and so the subject proposal falls considerably lesser than this. The Applicant believes that the proposed design and location benefits from many natural siting and design measures that should minimise the visual impact as far as possible, especially when the technical requirements are afforded due weight.

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The search process involved an initial 'desk-top' survey to ascertain and identify major constraints and impediments, followed by a physical search of the area. It is important for the reader to acknowledge that demand for network coverage is always most prevalent within dense residential areas, especially following the shift in working patterns from urban centres to suburban areas. It is imperative for the reader to acknowledge that it is almost impossible to introduce new infrastructural elements to any environment without some degree of impact. Indeed, with communications infrastructure, it is virtually impossible to physically enhance the setting in which it is located and more often than not, all that can be done is seek to limit impact to an absolute minimum through sensitive siting and design practices, as has been the case.

Figure 2 captures the mixed-use urban fringe setting where there is a noticeable break in the residential character of the area. Contrasting residential neighbourhoods fall to the application site's East and West, with extensive open space (Philips Park) to the north, and the major sporting venue of the Manchester Velodrome to the south. In this specific area, the urban grain is coarse with massively increased plot sizes and significant infrastructure already in place. The open nature of the area is believed to absorb the proposed development without creating dominance. The proposed site is located on a grass verge on the periphery of the National Cycling Centre parking facility. It remains offset from any pedestrian paths and is bound by a dense band of trees and a metal palisade fencing.



(Figure 2: Aerial View of application site in relation to the existing installation)

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The proposal ensures that pedestrian movement remains unobstructed, in accordance with the Department for Transport's Manual for Streets (MfS, 2007). The installation is set back on a section of grass, providing ample space for pedestrian passage. Given the site-specific context, the development is not expected to interfere with the natural line of travel for footpath users. The proposal is also sited away from tactile paving, crossing points and visibility sightlines. This location is thought to specifically address previous highway concerns.

The closest listed building is approximately 450m West of the proposed application site. Given the substantial separation distances and the intervening landscape features, no adverse impact is anticipated. Phillips Park sits opposite the proposed application site, with separation distances of approximately 20m. It is registered as a Grade II listed site on the National Register of Parks and Gardens of Special Historic Interest in England, recognized in 2001 for its historical significance as one of the country's first municipal parks.

Due to its siting, the proposed pole will not intrude into the historic fabric of Phillips Park or alter any of its key designed features. Views of the structure from within the park will be limited, filtered by existing vegetation and boundary treatments that already provide visual enclosure around the entrance. The park's primary character and significance derive from its historic layout, planting, and its role in the early evolution of public open space—none of which will be physically affected or materially altered by the proposal.

The Norweb substation, located in a similar position directly opposite the park, provides a clear precedent for the presence of infrastructure of this scale within the surrounding townscape. Its long-established presence demonstrates that such elements can sit adjacent to the park without detracting from its special historic interest. In the same way, the proposed base station, positioned outside the designated boundary, will not intrude upon the park's historic setting. This reinforces the conclusion that infrastructural elements of this type are acceptable in this location, provided they remain outside the park designation and do not interfere with its core attributes or significance.

Given its close proximity to Stuart Street Residential area, the Applicant recognises that the very nature of installing new 5G communications infrastructure within this area requires a well-measured balance between the need to extend practical coverage with the risk of increasing visual intrusion. This proposal has been strategically placed by radio planners in conjunction with a team of multi-skilled professionals, in an area that is expected to have the least overall impact in terms of dominance and 'harmful' short-fixed views.

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The Applicant does not anticipate that a large volume of direct and dominant views will be activated due to the proposal's specific siting and design measures. The closest residential property is 61 Stuart Street, sited approximately 45m to the southeast. Upon further investigation, the building's orientation and fenestration are particularly favourable, limiting visibility as the building's quoin fronts onto the development as opposed to windows. When the thick bands of 10-12m trees are factored in from both sides of Gwelo Street, visibility is thought to be mostly intermittent and greatly softened. For residential properties further down Stuart Street East, another layer of screening is activated from the intervening-built environment.

At the proposed application site, there are some inactive and derelict frontages close by. These frontages, by their nature, do not generate residential, commercial, or community activity. They therefore do not represent locations where issues of outlook, privacy, or visual intrusion would arise. By positioning the new mast in relation to such a frontage, the immediate impact of the development falls upon land and buildings which are currently unused, rather than on active residential or commercial premises. The proposed siting of the installation has therefore been carefully selected to ensure that the amenity of nearby residential occupiers is preserved. In this context, the presence of an inactive frontage provides a significant buffer between the mast and those nearest sensitive receptors.

The presence of derelict or inactive frontages provides an appropriate location for essential telecommunications infrastructure, as such sites do not contain sensitive uses and already make a limited contribution to the character of the area. By positioning the mast against this backdrop, visual impact is absorbed within an environment of low townscape value, thereby avoiding unacceptable effects on residential outlook, privacy, or amenity. This approach strikes the balance sought by national and local policy: delivering modern digital connectivity while safeguarding the amenity of nearby residents and minimising harm to local character.



(Figure 3: Streetview of application site)

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(Figure 4: Streetview of application site)

Fairclough Street is a relatively quiet local road that primarily serves to connect residential streets with larger arterial routes, such as Alan Turing Way further to the west. As such, the street accommodates lower volumes of through-traffic compared with nearby main routes, and the level of passing views is expected to be correspondingly limited. Where views do occur, they are typically intermittent and short-lived. Consequently, the sensitivity of visual receptors along this corridor is assessed as low, and any visual change resulting from the proposed development is likely to be minor and localised in nature. This is especially true when the reader appreciates the setback location behind fencing and tree foliage.

The street scene is not continuous or monotonous where visual change is easily identified. There are subtle but effective camouflaging techniques hidden within the various heights, materials, textures, shapes, colours, and depths, ultimately allowing any visual change to be softened, especially when the proposed design is specifically intended to replicate a common streetlight pole.

The site selection process was further influenced by the presence of similar vertical street furniture within close proximity to the site. Several street lighting columns line both sides of Fairclough Street with the additional reoccurrence of large and mature tree canopies that provide generous screening opportunities. Road signage, advertisement displays and vertical fencing are all plotted across the street scene. The existing telecommunication tower at the substation, combined with rooftop equipment on nearby apartment blocks and the decorative spikes on the exterior of the National Cycling Centre—which extend approximately 10 metres above the building height to around 90 metres above ground level—contribute to a varied skyline of engineered and architectural features. These elements collectively establish a local precedent for vertical structures of significant height, demonstrating the

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council's existing tolerance for tall, visually prominent infrastructure within the surrounding townscape. When the proposal is viewed in conjunction with these similar structures, it is believed to create an environment where the proposal can easily assimilate with and integrate somewhat effortlessly into the street scene. Many recent appeals have held great weight to the presence of street furniture in terms of visual assimilation and integration.

In addition to the existing built form, the visual character of the area is strongly influenced by a collection of large lattice pylons, which extend up to approximately 33 metres above ground level and are prominent features that break the skyline. Two of these pylons are situated at the opposite end of the car park, with associated overhead lines and connecting pylons extending outwards in a north-easterly direction. These vertical elements are highly visible within the local townscape and form a well-established component of the wider visual baseline. As such, they provide a contextual backdrop that helps to visually absorb the proposed development and reduce its prominence within the wider landscape. When viewed alongside this significantly taller infrastructure, the visual impact of the proposed structure is reduced. The human eye naturally calibrates scale based on contextual references, and in this case, the proposed monopole should be visually subordinate to the existing pylon, especially when one acknowledges the slimline form. As such, the proposal is not considered to introduce an incongruous or unfamiliar feature into the skyline. Their presence demonstrates another tolerance for large-scale, engineered infrastructure within the local context and therefore sets a clear precedent for the type and scale of vertical structures that Manchester City Council has historically accepted in this area.

Visual concerns associated with the pole height was raised in the previous application (142290/TEL/2025) but it is important to note is that form follows function when dictating the design of such infrastructure and so it is virtually impossible to provide the requisite coverage by utilising the likes of a 7m streetlight pole. This would create a visual impact with little coverage, contributing towards the proliferation of masts and failure of ICNIRP compliance. Whilst the proposal may peer above the development line, it is important that the reader recognises this as an operational requirement that cannot be compromised. Features of the surrounding area must be cleared so the antenna can 'see over' any obstructions in order that they do not block the signals from the antennas. It also ensures that a safe, ICNIRP compliant installation is deployed in line with the operators license agreements. It is absolutely paramount that the Planning Authority afford due weight to the technical and operational constraints associated with such infrastructure when coming to a balanced decision.

A recent appeal decision (Ref: APP/P4605/W/23/3360524) showed the Inspector's acceptance of such pole heights within a residential area of Birmingham. This

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decision sets a strong precedent that supports this 20-metre proposal at Fairclough Street. The Inspector clearly stated that;

"telecommunications equipment is often located in or adjacent to residential areas and that this does not, in itself, render a location unsuitable."

While acknowledging that the mast would be "readily visible," within the same appeal case, the Inspector concluded that it would not be "unacceptable or overly prominent." This supports the principle that visibility or height alone (e.g., 20m masts) does not automatically justify refusal, especially when set against the government's imperative to expand digital infrastructure. It is the applicant's view that concern about visibility or scale can be counterbalanced with this reasoning, showing that visual impact must be weighed in context and not treated as determinative.

This recognition reinforces the acceptability of siting monopoles in residential settings, even where they are visible. This proposed site is similarly within a residential or mixed-use area, and so this judgment confirms such locations are not inherently inappropriate under national or local policy. Industry guidance explains the technical constraints associated with the deployment of 5G technology in dense residential areas at Paragraph 37 of the *Code of Practice for Wireless Network Development in England*;

'Where higher frequencies are used, with lower signal propagation characteristics, apparatus will need to be located in closer proximity to user devices.'

It's worth noting, just because a development is generally visible and is in proximity to residential areas, does not necessarily equate to a significant detrimental impact. It is likewise important to note that the street works monopole design itself is typical of street furniture found in such urban locations and as such should not look inappropriate in the context of existing street lighting columns. It is often only found when actively seeking out its presence. It is considered that the overall character of the area will not be detrimentally affected by the development and over time should become an accepted element of the street scene.

The proposal will deliver significant public benefits by enhancing digital connectivity and supporting next generation 5G services for residents, businesses, and visitors, ensuring that the area is well-served by modern communications infrastructure in accordance with national and local planning policy. A key component of the proposal is to accommodate for the high influx of users on Etihad match days, providing sufficient network coverage and capacity to enable residents and businesses to operate without disruption. At the same time, it will ensure that visitors have a reliable and high-quality user experience, with access to up-to-date

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information and services as needed. By doing so, the development supports both everyday digital needs and peak-demand periods, contributing to the overall resilience and efficiency of local communications infrastructure.

The equipment is considered unlikely to have any material impact on the local area, however it should bring significant connectivity improvements, which is a material consideration in the judgment of the site suitability. The cell search area was assessed at the survey stage from the perspective of planning and residential amenity, while a detailed site evaluation, in line with the Local Development Plan and relevant policies has helped shape this application.

The proposed structure, although taller than the surrounding existing elements (a major technical requirement), would only be seen from relatively close proximity due to its orientation and sitting, set back from the main road. It is considered that the additional height would not be readily appreciated and would not appear dominant. The pole design should look utilitarian and regular in appearance and reflect its function. It is considered that the overall character of the development should therefore be confined to what is acceptable in the locality and over time should become an accepted feature as with other forms of communication, like roads and railways and installations used by other essential public utilities.

The Government's National Planning Policy Framework sets out that an advanced, high-quality communications infrastructure is essential for sustainable economic growth. The development of high-speed broadband technology and other communications networks also plays a vital role in enhancing the provision of local community facilities and services. As the shift in demand is expected for the foreseeable future and that as central government considers digital communications to be a critical national infrastructure, the intention is to support customers and local residents by ensuring as little disruption as possible.

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

Coverage plots available upon request

Type of Structure:

20m monopole, c/w 6no antennas, 1no. GPS Module, 3no. RRUs, 2no. 0.3m dishes, 2no cabinets and ancillary development thereto.

Overall, Height:	20m AGL
Height of existing building (where applicable):	N/A

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Equipment Housing:	
Depth:	Please see enclosed drawings
Width:	Please see enclosed drawings
Height:	Please see enclosed drawings
Materials (<i>as applicable</i>):	
Tower/mast etc – type of material and external colour:	RAL 7035 – Light Grey. Unless otherwise specified by the LPA
Equipment housing – type of material and external colour:	RAL6009 – Green. Unless otherwise specified by the LPA

Reasons for choice of design:

Paragraph 22 of the Code of Practice for Wireless Network Development in England articulates that *'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.'* To minimise this impact, the Applicant has proposed a slimline design that resembles a typical street lighting column which is an established feature of the urban streetscape and aligns with the Council's Local Development Plan. This design approach is considered the most sensitive and contextually appropriate solution available as opposed to another lattice tower.

The equipment has been compactly arranged, and a bulky headframe has been avoided by mounting antennas directly onto the pole. This ensures a discreet profile without compromising performance. The proposed antenna array comprises six units, configured with essential vertical separation to prevent signal interference—comparable to several people speaking at once in a room, resulting in unintelligible communication. Maintaining this configuration is critical to preserving service quality and avoiding user disruption. This design represents the most compact and efficient arrangement possible while still meeting structural, spatial, and operational requirements.

Reducing the column width any further would make it unfit to accommodate internal cabling and necessary components, potentially requiring the deployment of an additional base station. Such proliferation of infrastructure would be contrary to the aims of the National Planning Policy Framework (NPPF) and the Code of Practice for Wireless Network Development in England, both of which encourage the minimisation of new mast installations (*consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion*).

The Code of Best Practice for Wireless Network Development in England advises that masts should be coloured to match their backdrop in order to minimise impact on an urban or rural setting. Its colouring, (RAL7035 light grey) was proposed to assimilate

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with the existing streetlights, pylons and the commonly grey British sky. The Applicant would like to invite the Case Officer to suggest an alternative colour, should they consider a different option more appropriate.

The radio equipment cabinets and their associated size has been limited to what is required to meet current and foreseeable network requirements. The location of the equipment cabinet at the foot of the monopole, and the electronic communications equipment housed within them, reflects the operational requirement to be in reasonable proximity to the antenna systems they support. This avoids exceptionally large runs of feeder cables and associated supporting trays and the subsequent deterioration of radio signals.

The pole has been reduced to the minimum operational height required to comply with ICNIRP safety guidelines and met the site-specific requirements of this cell area. 5G technology relies on higher-frequency bands, which offer much greater data speeds but have shorter propagation ranges and are more easily blocked by buildings, trees, and other urban obstacles. By positioning antennas at 20m AGL, the network can maintain clear line-of-sight over rooftops and across streets, reducing this to 17.5m would create interference and dead zones. Lower installations would necessitate a far greater number of smaller infill sites to achieve equivalent network performance. This would be contrary to both the Operator's efficiency objectives and national planning policy, which seeks to minimise the overall proliferation of telecommunications equipment and associated visual impact. Retaining the pole at 20m therefore represents the least intrusive and most policy-compliant solution, balancing technical requirements with planning considerations. It is considered that the proposed height and therefore the associated visibility of the scheme does not outweigh the overall public benefit.

When these strategic siting and design measures are coupled with the monopole's slimline design, it provides the Applicant with the reassurance that serious overshadowing or loss of daylight should not be an issue here.

The applicant would like to stress that the proposal is seen in the context of the Operator's license requirement and customer obligation to provide and maintain a continued network service. The proposal has been designed with the core aim of achieving balance between minimising visual impact and achieving the technical requirements required by the operator and the government.

The technical requirements of mobile communication operators such as the applicant are acknowledged in the National Planning Policy Framework which states that local planning authorities should support electronic communications networks and their provision, including telecommunications and high-speed broadband.

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It is therefore considered that the proposal before you strike a good balance between environmental impact and operational considerations. The proposed height and design of this installation represents the best compromise between the visual impact of the proposal on the surrounding area and meeting the technical requirements to replicate the existing coverage and provide high-quality and high-speed communication infrastructure essential for economic growth to improve a critical service as illustrated by the NPPF.

Health and Safety

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.

When determining compliance, the emissions from all mobile phone network operators on or near to the site are taken into account.

In order to minimise interference within its own network and with other radio networks, VMO2 operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision

As part of VMO2's network, the radio base station that is the subject of this application will be configured to operate in this way.

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.

The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.

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4. Technical Justification

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

At present, it is paramount that digital connectivity is supported and maintained throughout the country. As the demand for mobile data in the United Kingdom is increasing rapidly, and people and businesses have become increasingly reliant on mobile connectivity, it is essential the infrastructure is in place to keep pace with growing demand, so present and future generations have access to dependable, high-quality and consistent mobile coverage where they live, work and travel. This is particularly true as all four MNOs have either completed their 3G switch off, or they are working towards it. VMO2 expect to fully switch their 3G services off by the end of 2025 and so it is paramount that a reliable and resilient 4G and 5G network is in place.

The licence granted to VMO2 demands that strict coverage qualities are met. It is essential that the benefits of mobile communications are available for all communities. The operator uses computer-based radio planning tools to identify gaps in coverage, then predict levels of signal strength and coverage from nominal locations to fill these gaps. This analysis includes both geographic coverage gaps and capacity gaps or 'bandwidth'. The current base station is incapable of being upgraded following the GDC failure and so a new base station is therefore required to allow the roll-out of 5G in this important cell area.

The dynamic nature of technological advances in the telecommunication industry coupled with ever increasing demand from subscribers dictates a continual reinvestment programme on the part of the operators. As a result, and in line with their license requirements, mobile operators are constantly developing their networks. The operator not only has a license requirement to provide a certain level of 4G/5G coverage to the population, they are also obliged to meet the growing consumer demand for 5G coverage, especially as more people are purchasing 5G enabled devices, in line with their license obligations and the operators competitive market driven "requirement" to provide a high-quality service. Customers expect to be able to access their portable handheld devices wherever they are, whether that be indoors or outside. There is currently no 5G service provision that is provided by VMO2 in this cell area. This gap can only be filled by providing a new installation within this locality, so that it can link up with the next cell and provide continuous coverage for the appellant's network and those Virtual Mobile Network Operators who buy network space off them.

Coverage plots cannot illustrate the capacity of the site which the surrounding sites cannot fill. Therefore, coverage is currently worse than the plots can predict. The term 'Capacity' refers to the fact that each base station can only provide service to a certain number of users at any one time. When this 'Capacity' is exceeded, although 'Coverage' remains present, the base station cannot provide service to any further

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users and calls/text/data usage would be unavailable. The proposed new base station will also meet the extra demands on the network in this area as more people use internet-enabled handheld devices ('capacity').

There are only four UK mobile networks: VMO2, Vodafone, EE and Three. All the other providers piggyback i.e. buy space from one of these four networks e.g. Giffgaff, Tesco Mobile, and Sky Mobile are on the VMO2 network. If the parent network does not have coverage (or capacity) then neither will the Mobile Virtual Network Operator's (MVNO) that borrows network space from the parent network. Therefore, this does not provide the consumer with a full choice for their service provision. It will also be anti – competitive as VMO2 and Vodafone will not be able to provide a 5G service in this area.

5. Site Selection Process

The operator's acquisition and survey agents endeavoured to identify a site which would minimise any potential impact on the character and value of the area however a replacement upgrade site would be required to be located as close as possible to where the customer demand is present.

In accordance with the Operator's license obligations and advice in the NPPF and the Code of Practice for Telecoms development, the site acquisition specialists undertook a search which investigated the following siting and design options, using this sequential approach to site selection:

1. Upgrading their own existing base stations - The existing apparatus cannot be utilised as it failed the industry's structural test. It would require a significant redevelopment that the Applicant believes would be more visually intrusive than what is currently proposed. This is reiterated by the refusal precedent outlined above.
2. Using existing telecommunications structures belonging to another communications operator. i.e. Mast and/ or site sharing, co-location. The Applicant has utilised site sharing opportunities for as long as it was technically fit, but now the structure is no longer fit for purpose. There are no other existing communications sites in the area which would be able to host additional communications apparatus due the extent of technologies to be accommodated.

Furthermore, the existing telecommunications base stations present in the neighbouring areas would not be able to accommodate the additional VMO2 equipment as they would be too close to the existing operational site

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for those cell areas. This would result in an overlap of coverage and would simply cover an area already covered and not the target area. This would cause interference, being too far removed from the intended target area where the specific network coverage is required.

3. Installations on existing high buildings or structures including National Grid pylons. For a rooftop installation the roof must be flat, of sufficient height with clear lines of site to neighbouring base stations and be structurally able to accommodate the heavy equipment. Within the search area, the roof scape is pitched domestic roofs with some tall buildings and as such there are very limited rooftop sites to consider. Each of these will be explored within the discounted options below.

The possibility of deploying equipment on the nearby pylons were investigated, but unfortunately, it poses a health and safety risk in several ways; the cumulative electromagnetic fields of the telecommunication and electricity equipment would have to be considered as well as how much interference would be anticipated upon the proposed signal. This cumulative EMF voltage would require special permits and riggers which are extremely difficult to source and considering the level of interference, it's not reasonably feasible. An installation here would have to be shut down more each time a fault is identified, or maintenance checks are required on the pylons. This is not best practice and would not serve the customers well.

To maintain existing coverage, the search for a replacement is constrained to within the cell area (as shown on Figure 5) so that it fits into the existing wider network like a piece of a jigsaw. If the apparatus is relocated too far outside of the nominal cell area it could leave a gap in existing network coverage elsewhere. The replacement site must replicate the footprint of the current network coverage present.

The layout of the surrounding built environment presents significant challenges due to the density of buildings; underground services coupled with the topography of the land which rises to the East and falls to the West. This means that there are few available areas that are suitable to accommodate a telecommunications installation due to the limited space available both underground (due to services) and above ground as a result of narrow footpaths.

The following sites were investigated for their potential to accommodate a telecommunications base station installation, however, for the reasons detailed below, the locations sought were subsequently discounted.

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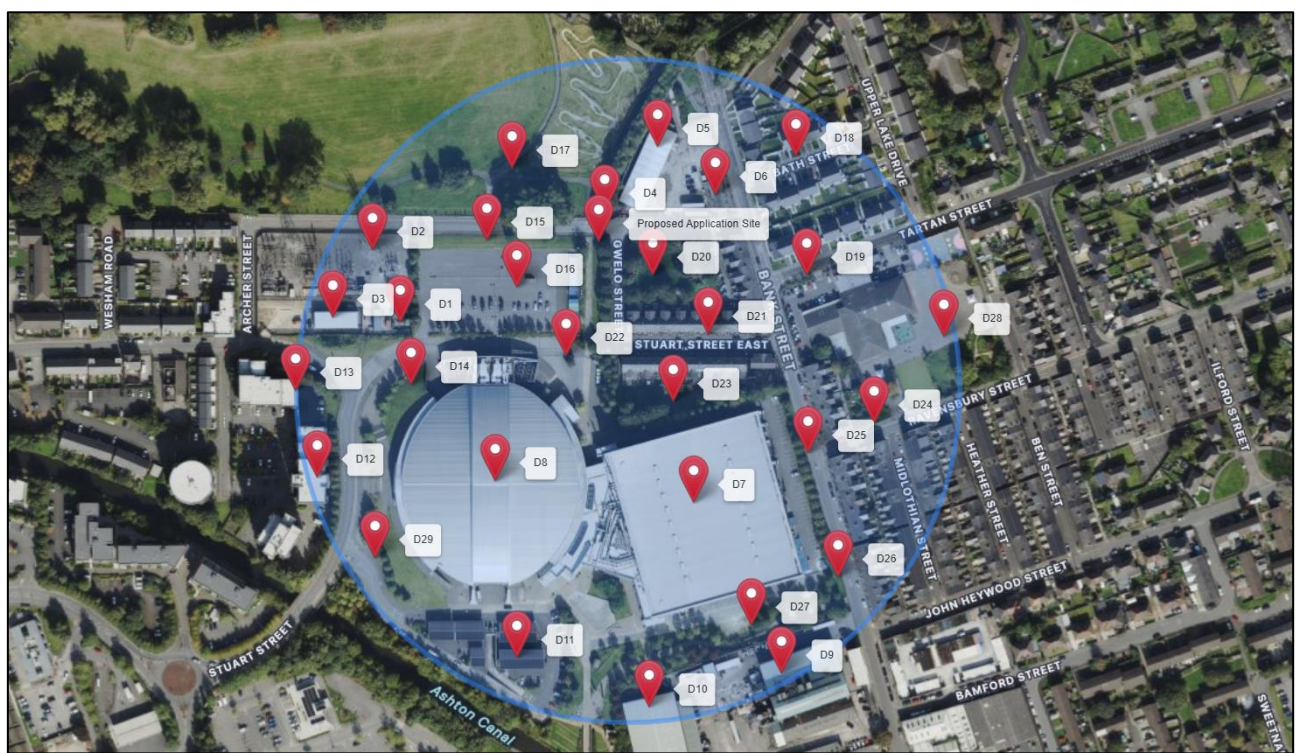


Figure 5: Table of Discounted Alternative Options

Site Type	Address	NGR	Reason for not choosing site
D1	National Cycling Centre, Stuart Street, Bradford, Manchester, Greater Manchester, England, M11 4TE, United Kingdom	387308, 398875	D1 is the existing installation and for reasons already addressed, specifically the structural limitations, this tower cannot be utilised for an upgrade.
D2	Fairclough Street, Bradford, Manchester, Greater Manchester, England, M11 4DQ, United Kingdom	387291, 398917	The pylon structures have also been discounted for the health and safety risks, potential for interference, difficulty finding specially trained riggers as well as the network disruption during maintenance visits.
D3	Stuart Street, Bradford, Manchester, Greater Manchester, England, M11 4TD, United Kingdom	387268, 398877	This rooftop is low-lying requiring a large stub mast which would be visually prominent. Complications continue to arise when one notices it's sloped rooftop and proximity to existing infrastructure. Radio interference would be

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			created here across all four MNOs and so D3 was discounted.
D4	Bank Street, Openshaw, Manchester, Greater Manchester, England, M11 4BT, United Kingdom	387429 , 398940	After the closure of the Bradford Street Viaduct, this section has been transformed into a unique elevated park, providing a new recreational space. An installation here was thought to have a greater impact upon the registered park and create ICNIRP complications. It was therefore discounted.
D5	Bank Street, Openshaw, Manchester, Greater Manchester, England, M11 4BT, United Kingdom	387460 , 398978	D5 was discounted as the rooftop is low lying and unsuitable in terms of its design and structural capacity. For reference, a 6m stub tower with headframe and grillage amounts to 4.3 tonne. The building has a pitched roof, in which there is nothing for the apparatus to be securely attached to on a sloping roof as significant steelwork and bracing would be required internally to support the equipment. Attaching telecoms development to the roof would not be possible as the material would be dragged off by the sheer weight of the equipment and cause the roof to collapse. Simply put the building is not suitable from a practical and build perspective given its construction and roof shape.
D6	Fairclough Street, Bradford, Manchester, Greater Manchester, England, M11 4DQ, United Kingdom	387494 , 398950	D6 was discounted for the same reasons as D5. Whilst it is slightly higher and on higher ground, the building height is still too low to reach the entire cell area. A 10m stub tower would be required but given the lack of flat roof space and the structural condition of the

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			building, this cannot be engineered safely.
D7	National Cycling Centre, Stuart Street, Bradford, Manchester, Greater Manchester, England, M11 4TE, United Kingdom	387481 , 398768	D7 is proposed on the roof of the national cycling centre, which stands approximately 20m AGL. When assessing the building in more detail, it is apparent that there is a sloping roof which is unsuitable from a design and build perspective.
D8	National Cycling Centre, Stuart Street, Bradford, Manchester, Greater Manchester, England, M11 4TE, United Kingdom	387363 , 398781	The velodrome also presents similar issues that are exacerbated by the particular roof design. From a design and build perspective, this option had to be discounted.
D9	National Cycling Centre, Stuart Street, Bradford, Manchester, Greater Manchester, England, M11 4TE, United Kingdom	387532 , 398667	D9 has a partially flat roof but it remains as a relatively low-rise. ICNIRP complications arise from the rising apex that adjoins the roof. An installation here would have to incorporate a large stub tower to clear the exclusion zones. It's placement on the edge of the search area would mean that only one sector would provide signal to the cover area, with the remaining two sectors being duplicated. If the proposal was placed here, coverage gaps would arise as well as the requirement for a feeder site which is contrary to policy.
D10	National Cycling Centre, Stuart Street, Bradford, Manchester, Greater Manchester, England, M11 4TE, United Kingdom	387454 , 398647	D10 represents a low-lying, pitched industrial unit which is not compatible with the design and build requirements. It is also on the edge of the search area, meaning two sectors are wasted with the other sector struggling to serve the area by itself. D10 was therefore discounted.
D11	National Cycling Centre, Stuart Street, Bradford,	387376 , 398676	D11 is unsuitable as it would hinder the solar panel operation and

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	Manchester, Greater Manchester, England, M11 4TF, United Kingdom		currently there is no design solution that would allow the equipment to be mounted here. It also remains low lying, leading to ICNIRP and coverage issues.
D12	Stuart Street, Bradford, Manchester, Greater Manchester, England, M11 4TF, United Kingdom	387258, 398783	D12 has a 22m building height which in theory is favourable but when the 14-storey block (40m AGL) is factored in, one should realise that signal and line of sight to neighbouring stations would be immediately blocked, massively hindering operations. It is also on the edge of the search area, which is unacceptable for reasons outlined above.
D13	Stuart Street, Bradford, Manchester, Greater Manchester, England, M11 4TF, United Kingdom	387245, 398835	D13 has one of the lowest building heights (18m AGL) in this area of high-rise apartments. Given the height and massing of the neighbouring properties found next to this site, this built clutter would prevent the effective propagation of radio signals towards the target area as it would block the signal. It is also outside of the search area and too far removed from the nominal, necessitating a second feeder site which is contrary to planning policy.
D14	National Cycling Centre, Stuart Street, Bradford, Manchester, Greater Manchester, England, M11 4TF, United Kingdom	387314, 398838	D14 sits on a large slope which would require more engineering works to ensure the pole is secure. To avoid network interference there needs to be vertical and horizontal separation between masts. In this instance, 35 metres between the existing mast, that accommodates all four MNOs and D14 is not sufficient enough. Therefore, co-location within this

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			radius of the existing mast is not technically viable due to network interference.
D15	National Cycling Centre, Stuart Street, Bradford, Manchester, Greater Manchester, England, M11 4TF, United Kingdom	387359 , 398923	D15 remains within the same general area as the substation and large pylons, but considering it's more exposed location across Phillip's Park, it was discounted.
D16	National Cycling Centre, Stuart Street, Bradford, Manchester, Greater Manchester, England, M11 4TF, United Kingdom	387376 , 398895	D16 was discounted as it would sterilise valuable parking provision during events. There is also planning permission for solar panels over this car park, and so the development here would hinder the prospect of renewable energy, which is contrary to planning policy.
D17	Pump Track, Fairclough Street, Bradford, Manchester, Greater Manchester, England, M11 4DQ, United Kingdom	387374 , 398966	A site in this location would be too close to overhead power lines to be safely installed and maintained in line with health and safety requirements. It is also sited in Phillip's Park which has a greater impact upon the designation.
D18	Bath Street, Clayton, Manchester, Greater Manchester, England, M11 4TW, United Kingdom	387542 , 398972	There are houses fronting both sides of this road, the pavements are narrow and there are regular driveways and pathways for the properties. Given the purely residential setting there are no opportunities to site a streetworks style proposal on Bath Street as on balance any scheme would compromise pedestrian movements, access arrangements to properties and impact on highway safety.
D19	Bath Street, Clayton, Manchester, Greater Manchester, England, M11 4TW, United Kingdom	387548 , 398902	D19 has a higher residential visibility than what is currently proposed. There are also underground services at this location that would restrict the

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			physical installation. Finally, it's location adjacent to a school is often perceived by the public as a sensitive receptor and so D19 was discounted.
D20	Fairclough Street, Bradford, Manchester, Greater Manchester, England, M11 4DQ, United Kingdom	387457 , 398902	D20 acts as a community garden for local residents and so it was also deemed highly inappropriate to site an installation here. D20 was therefore discounted.
D21	Stuart Street East, Bradford, Manchester, Greater Manchester, England, M11 4DF, United Kingdom	387490 , 398867	There are houses fronting both sides of this road, the pavements are narrow and there are regular pathways for the properties access. Given the purely residential setting there are no opportunities to site a streetworks style proposal on Stuart Street East as on balance any scheme would compromise pedestrian movements, underground services and impact on highway safety.
D22	National Cycling Centre, Stuart Street, Bradford, Manchester, Greater Manchester, England, M11 4TF, United Kingdom	387406 , 398854	An installation at D22 would have the potential to disrupt vehicular movement and underground services. The volume of space is also limited here, requiring the removal of the existing streetlight and tree, which has a higher impact than what is currently proposed.
D23	National Cycling Centre, Stuart Street, Bradford, Manchester, Greater Manchester, England, M11 4TF, United Kingdom	387469 , 398828	An installation here would sit in a green amenity space to the rear of properties on Stuart Street East. It would look inappropriate here, having little streetlight/pylons to assimilate with. Access to the site is also restricted which wouldn't allow engineers to maintain the site 24/7. It is also on a slope with requires additional engineering works to ensure a safe installation.

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D24	Ravensbury Community School, Tartan Street, Clayton, Manchester, Greater Manchester, England, M11 4EG, United Kingdom	387588 , 398815	D24 was discounted for its location adjacent to residential properties and a community school. The pavement is narrow here and could lead to highway issues. An installation here was anticipated to have a greater impact than what is currently proposed.
D25	National Cycling Centre, Stuart Street, Bradford, Manchester, Greater Manchester, England, M11 4TF, United Kingdom	387549 , 398797	An installation here is close to residential properties, although visibility is thought to be low from fixed viewpoints. Long ranging views are likely to be activated from passing vehicles and pedestrians. The pavement is also narrow, constrained further by underground services, rendering the possibility of an installation here.
D26	National Cycling Centre, Stuart Street, Bradford, Manchester, Greater Manchester, England, M11 4TF, United Kingdom	387566 , 398723	D26 would be subject to direct and front facing views from dense terrace housing with little separation distances. The impact to residential amenity is much higher here and so D26 was discounted.
D27	National Cycling Centre, Stuart Street, Bradford, Manchester, Greater Manchester, England, M11 4TF, United Kingdom	387515 , 398695	In this location, two of the main sectors would be blocked by the national cycling centre and so coverage to the North would be sporadic. A taller structure and a second feeder would be required but these are contrary to planning policy and so D27 was discounted.
D28	Ravensbury Community School, Tartan Street, Clayton, Manchester, Greater Manchester, England, M11 4EG, United Kingdom	387629 , 398865	D28 is proposed on the playground of a community school which would have a direct impact on the operation of the business. It is also located at the edge of the search area, meaning coverage to the West would be

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			unreliable. D28 was therefore discounted.
D29	National Cycling Centre, Stuart Street, Bradford, Manchester, Greater Manchester, England, M11 4TF, United Kingdom	387292 , 398735	D29 was also thought to have a greater impact upon residential amenity, being siting directly in front of multiple apartments. Signal and line of sight is thought to be blocked from this location and so it is not feasible to progress.

The assessment confirmed that no viable site-sharing opportunities exist, and no suitable rooftop installations were identified. Whilst a degree of visual impact is acknowledged, this should be weighed against the technical limitations, the lack of alternative siting options, and the mitigation measures implemented by the Applicant.

Inspectors at appeal have made clear comments on the exploration of alternative sites such as a telecommunications monopole and equipment cabinet on the footpath of Brewery Road at the junction of Piedmont Road, Plumstead, which was refused by the Royal Borough of Greenwich (PINS ref: APP/E5330/W/16/3159250). The inspector considered the siting and appearance of the proposed installation on the character and appearance of the street scene and the area and whether any harm caused would be outweighed by the need to site the installation in the location proposed.

The Inspector noted in Paragraph 9 that *'Interested parties have raised concerns about... whether sufficient exploration of alternative sites has been undertaken....with regards to alternative sites, I have noted the appellant's submissions within the Supplementary Information, but I am mindful that even if alternative sites were available, there is no requirement within the Framework or the GPDO for developers to select the best feasible siting'*.

The main issues arising from this prior approval application are whether the proposed monopole and cabinets, would be a visually obtrusive feature which would be detrimental to the character and appearance of the area, and whether any perceived harm would outweigh the significant social and economic benefits associated with the roll-out of 5G and the next generation connectivity, taking into account any suitable alternative sites.

The above Inspectors' decision clearly acknowledges that there can be more than one location deemed as acceptable to provide a service. The proposed site is not considered to adversely harm the character and appearance of the area, and taking all planning, technical, operational and accessibility perspectives into

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account is the proposal is the best option to minimise visual impact and meet the technical and operational requirements of the operator enable VMO2 to provide enhanced 4G and new 5G services for this densely populated area in line with the Government's aspirations to be a world leader in 5G, the next generation of wireless connectivity, and for communities to benefit from the investments in the new technology.

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

N/A

Land use planning designations:

None

Additional relevant information:

In light of the provisions of Schedule 2, Part 16, Class A of the GPDO, the development is assessed on the basis of its siting and appearance. The provision of the development plan are only material considerations as far as they relate to siting and design. The main issues arising from this prior approval notification are whether the proposed monopole would be a visually obtrusive feature which would be detrimental to the character and appearance of the area, and whether any perceived harm would outweigh the significant social and economic benefits associated with the roll-out of 5G and the next generation connectivity.

National Planning Policy Framework

The governments National Planning Policy Framework (NPPF) sets out government's planning policies for England and how these are expected to be applied. Section 2 of the NPPF confirms that sustainable development is at the heart of the Framework.

Paragraph 8 states: 'Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways

- to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe

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places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

- to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.'

The installation will enable the operator to provide the required improvement to 4G and 5G services in the area, forming part of a network of high technology. These services allow home working and working on the move and can reduce the need to travel, thus contributing to the sustainability agenda.

The Government's latest thinking strongly supports communications infrastructure. Section 10 relates to 'Supporting high quality telecommunication'. Paragraph 119 of the framework document sets out the objectives of the communications Infrastructure. It states that 'advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being'. This is echoed by the Councils own Digital Communications objectives. Planning decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections.'

Paragraph 120 states 'The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate'.

Section 12 of the Framework relates to 'Achieving well-designed and beautiful places'.

Paragraph 131 states 'The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process'.

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Public benefits are defined within the NPPG 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.

In order for the UK to benefit from the huge potential of 5G Local Planning Authorities will have to weigh the Public Benefits of such connectivity with the requirements to instruct and manage the built environment. Central Government understands that this may present concerns with the various design solutions proposed but it is important that all Local Planning Authorities understand the technical needs of 5G and better understands the wider advantages of such new technology. This is further emphasised within the Commission's sixth Annual Monitoring Report, which is now known as the Infrastructure Progress Review, in March 2023. It concluded that the government has ambitious goals for infrastructure, but in many areas, it is not delivering fast enough. It did acknowledge that digital 'Infrastructure is a key part of the solution'.

Code of Best Practice on Mobile Network Development in England (2022)

The Code of Best Practice has been fully revised in 2022 and is now even more supportive of mobile network provision in line with Government aspirations that everyone should have access to the information no matter where they are located whether that be in rural or urban areas. This Code provides guidance to mobile network operators, their agents and contractors and equally to all local planning authorities in England. It supersedes the Code of Best Practice on Mobile Phone Network Development (2016).

The principal aim of this Code is to ensure that the Government's objective of supporting high quality communications infrastructure, which is vital to continued economic prosperity and social inclusion for all, is met. The development of such infrastructure must be achieved in a timely and efficient manner, and in a way which balances connectivity imperatives and the economic, community and social benefits that this brings with the environmental considerations that can be associated with such development.

The proposal will introduce new 5G services to the area. Notably, 5G also integrates the previous generations of mobile telephony through either utilising the existing radio spectrum and/or combining the advantages of previous generations and using multiple platforms to manage coverage and capacity. It is estimated that 5G will directly contribute to an additional £7 Billion a year to the UK economy in just six years from roll-out. Although 5G will undoubtedly bring new opportunities and huge benefits to society, we cannot escape from the requirement that new structures, antennas and ancillary equipment will be needed. But to do so the network needs to be surveyed, designed and planning approval obtained. It has been acknowledged by

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Government that we must ensure that we have the infrastructure in place to deliver 5G across our major centres and transport networks.

The Code acknowledges that there are special operational and technical considerations associated with mobile network development, which have changed over time due to changes in technology and associated changes in demand. The Code acknowledges that there remains a reliance on radio masts to provide the main umbrella of coverage. Typically, radio signals operate like light and must “see” over the target coverage area, they cannot be hidden and so there will always be a degree of visual impact.

It is commonly known within the industry that there is a need to continually upgrade and improve mobile networks, which will not function without the necessary infrastructure on which they rely. This is confirmed within the Code of Best Practice on Mobile Network Development in England which acknowledges ‘4G and 5G are likely to require further network densification in order to meet growing customer demand for data’ as well as improved coverage and capacity, together with ambitious Government aspirations.

The Code goes on to acknowledge that operators maximise the use of their existing network infrastructure for the provision of 5G services and are similarly upgrading their 4G network infrastructure to improve capacity and coverage. However, the revised Code continues to advise that this does not mean that there will not be a need for any new base stations. Indeed, for example, more base stations will be needed in areas where there has previously been only limited or no coverage and where coverage and capacity need to be enhanced in line with Government commitments and customer demand.

It implies that consumers, businesses and public bodies are increasingly relying on mobile communications and expect to receive a signal wherever they are. The Code indicates that recent changes in planning policy are intended to align with Government communications policy, where the ultimate goal is to achieve mobile coverage wherever it is needed.

The proposed development is well designed. Moreover, the installation will enable access to new services in the wider public good which supports ways of working which deliver wider planning, sustainability and quality of life benefits, is therefore in complete compliance with the Code of Best Practice.

Connecting Today for Tomorrow (2025/2026)

Cluttons LLP is a UK-based independent firm of chartered surveyors and property consultants. They recognise that connectivity is now a core utility, much like electricity

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or water, and they wish to stress how poor digital infrastructure can have a negative impact upon the UK's economy and social inclusion. Cluttons recently published a report entitled '*Connecting Today for Tomorrow*' and it provides up-to-date data on the UK's connectivity statistics, identifying gaps and making recommendations to support a more streamline process for the roll-out of technology. It explicitly highlights how the planning system can pose a significant barrier to deploying digital connectivity infrastructure, while also identifying opportunities for reform and leadership.

The main finding was that many planning decisions run counter to local community needs for upgraded digital services. It recognised that '*the amount of data we use on our mobile phones has more than trebled since 2019 in the UK and is set to climb further.*' But it continued to admit that the UK's connectivity advancements are falling behind on a global scale. Figure 8 shows that the UK fell to a ranking of 53rd globally for mobile download speeds last year and how this compares to some of the world leaders. The report predicts that the '*UK will miss its own targets for rolling out standalone 5G* across the country*' showing the adverse negative impact on the economy when highlighting; '*A new report from BT shows delays in rolling out standalone 5G is costing the economy £230 billion.*'

The report found that 71% of MPs believe the current planning system is slowing the rollout of 5G infrastructure. While it recognises that planning departments are often under-resourced, the report sets out several practical steps for the Industry to enable faster and more effective delivery of digital infrastructure:

- Launch a national information campaign to raise public understanding of the essential link between reliable connectivity and the physical infrastructure required to support it.
- Accelerate planning reforms to remove unnecessary delays and streamline approvals for telecoms development.
- Introduce Digital Placemakers in every local authority—strategic roles funded by central government to lead digital infrastructure planning and coordination locally.
- Translate pledges into action: The Government's Infrastructure Strategy made important commitments on digital infrastructure, but these now need to be backed by clear timelines and implementation.

Local Policy and Guidance

Manchester City Council does not have a specific telecoms policy. However, they have taken the following stance within their Citywide Development Control Policies:

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The Places for Everyone Join Development Plan (2022-2039) includes visions for the city fostering growth, infrastructure, and opportunities for the community. Policy JPC2: Digital Connectivity dives into the stance upon telecommunications for Bury, Bolton, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford, and Wigan.

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;
2. Requiring all new development to have full fibre to premises connections, unless technically infeasible and/or unviable, and to incorporate multiple ducting compliant with telecoms standards, to facilitate future-proof gigabit-capable network connections. It is expected that internet connections will be operational and immediately accessible to network providers when occupiers move into new properties and
3. Facilitating the provision of free, secure, high-speed public wi-fi connections, particularly in the most frequented areas.

Planning Assessment

Siting - The operator is limited in siting options as there is a requirement to provide equivalent coverage and capacity for this area of Clayton. The replacement of existing coverage means that the operator has to be located as close as possible to the existing installation in order to maintain the provision of equivalent coverage and capacity to the surrounding local area. An installation located outside of this search area would not allow the operator to provide their desired level of new 5G coverage or replacement 2G, 3G or new and enhanced 4G service provision and therefore would not adequately fill the current 4G and 5G coverage gap. These base stations are required where the service is required, where there is a population who demand service provision, placing an installation a distance away from a population means the installation cannot provide the service to where it is needed.

The proposed installation is an item of essential infrastructure and therefore will not cause any loss of privacy nor will any occupants of nearby properties be overlooked. The column and antennas do not emit any noise, odour, vibration, artificial light, or disturbance from air. The only noise emitted is from a cooling fan within the equipment cabinets, which only operate during hot weather conditions. However, within a few meters the noise is inaudible, particularly when considering the ambient noise levels of the area which include passing traffic. The proposed installation will not cause any traffic generation as it is not a visitor destination.

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Planning is carried out in the public interest and it is only when private and public interests coincide can a view to a third party's land, in this case the public highway, which is essentially a private property interest become a material planning consideration. As with views over any adjoining land, that the proposed radio base station may be visible from nearby properties does not equate with harm and cannot normally be regarded as a material planning consideration. It is only when the visual impact of adjoining development, in this case the proposed radio base station, from a principal living room of a nearby property becomes overbearing can it be considered as a material consideration. It is at this point that public and private interests will coincide. In situations where views of the proposed development when seen from the principal living room windows of an adjoining property will appear oppressive, for example, when there is serious overshadowing, loss of daylight and sunlight, or proximity of long lengths of two-storey blank flank wall along the common boundary between two properties, it will become a material consideration.

This is certainly not the case at the application site. The view of a communications pole cannot be said to be in any way overbearing or inappropriate and could therefore not be a material planning issue in the determination of this application for prior approval.

In line with the requirements of National and local policy, there are no opportunities for mast or site sharing or rooftop developments, or more suitable alternative sites. Whilst visual impact has not been removed entirely, it has been minimised as far as practicable. The discount options are set out above and their reasons for being discounted are fully explained. The proposed siting represents the best balance of radio coverage and visual impacts.

Appearance - The proposed design is the most sensitive option to supply 2G, 3G, 4G, and 5G technologies for VM02 from a single structure. The height of the proposed pole has been reduced to the absolute technical minimum of 20m. If the antennas were set any lower, they would breach ICNIRP Guidelines and be blocked by the metal clad buildings to the South. Although the proposed structure is taller than the surrounding townscape, visual impact is minimal given its location within the street scene and distance from more sensitive land uses. Whilst these design changes would compromise on coverage, it would still provide sufficient meaningful service provision.

Mobile phone masts are becoming a common feature of the street scene not just across Manchester, but across the UK. Taking all this into account, it is considered on balance, that the appropriateness of its setting against other design matters, there are insufficient grounds to warrant a refusal of this upgrade replacement mast on visual amenity grounds. Additionally, it will be light grey in colour which will reduce the

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capacity of the structure to draw the eye when viewed against the sky and this colour scheme is considered wholly appropriate for this setting.

It is therefore considered that the proposed design strikes a good balance between the visual impact of the proposal on the surrounding area and meeting the operator's technical and operational requirements for the site to provide high-quality and highspeed communication infrastructure.

Social and Economic Benefits

The current proposal will facilitate the development of an advanced telecommunications infrastructure in line with National Government guidance contained within the NPFF which supports infrastructure, especially where growth takes place. By providing the latest 4G technology and new 5G service provision the proposal will support the aspirations of Central Government for the UK to have nationwide coverage of standalone 5G to all populated areas by 2030.

Smart City Agenda

The way 5G works, is intricately connect with the Smart City agenda and will enable centralized control of many different street infrastructures owned or managed by councils, such as streets lights, water meters and bus stops. Trials have already begun across the UK to demonstrate the potential of 5G and how it can improve and drive productivity and efficiency. For instance, In June 2019, West Midlands 5G partnered with BT and University Hospitals Birmingham to trial the UK's first 5G Connected Ambulance. Real-Time communications between the paramedics and the hospital doctors enabled the effective diagnosis of the patient at an early stage of care. The trial showed how a paramedic performed a remote-controlled ultra-sound scan on a patient in an ambulance over a public 5G network. These trials show how digital connectivity and technology can reduce patient waiting times and save lives (Source: WM5G).

Sustainable Development

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. It also allows people to work from home or on the move. Residents and businesses will enjoy better accessibility, assisting home-based working by improving the electronic means of communication and the roll-out of high-speed broadband helping to promote live-work

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development. This reduces travel time, carbon emissions and increases the speed at which information is processed/shared. The proposals therefore fully comply with NPPF and the LDP. Providing the latest digital infrastructure to enable improvements in digital technology empowers and enables residents to have the highest quality of life, supports the creation of high-quality jobs and achieves the maximum productivity levels.

Resilient and Competitive Economy

Mobile connectivity is essential to the future success of the economy. The combined value of 4G and 5G mobile connectivity is estimated to add £18.5bn to the economy by 2026 (Councils and Connectivity Sept 2018). Mobile connectivity is essential to creating a better society. Digital inclusion can help people gain employment, become more financially secure and improve health and well-being, enabling communities to be more inclusive. Mobile connectivity is essential to fulfilling the potential of new technologies. Innovations such as artificial intelligence and connected cars will change how we work, spend our leisure time and run our public services.

Further benefits of high quality mobile connectivity include: promoting economic growth by attracting investment from business, which creates jobs and regional prosperity in line with national and local economic strategies; helps local businesses to offer a broader range of services, boosting the local economy; helps local Councils to offer online services such as school admissions and local information for residents supports local companies by facilitating working from home, offers social benefits such as being able to connect with vulnerable family and friends or contact the emergency services 24/7, and helps local councils to offer online services such as paying council tax bills which provides a more efficient service to name but a few benefits.

Drawing all these matters together, the benefits of the proposal outweigh the minimal impact on the character and appearance of the area. The proposal will enable VMO2 to provide enhanced 4G and new 5G services for this area of Clayton, Manchester, in line with the Government's aspirations to be a world leader in 5G, the next generation of wireless connectivity, and for communities to benefit from the investments in the new technology.

Paragraph 23 of the Code of Practice for Wireless Network Development in England outlines 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.'*

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The scheme design is of a high standard and will not detract significantly from the existing visual and environmental character of the area. The benefits to residents and visitors by maintaining coverage to the area far outweigh any potential perceived negative impacts. In all these circumstances it is concluded that there no policy or other objections that would warrant the refusal of planning permission and accordingly permission should be granted for the proposed development.

Confirmation that submitted drawings have been checked for accuracy

Name: (Agent)

Telephone:

Company:

Company
Address:

Mail Address:

Signed:

Date:

Position:

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