

Town Planning Statement
5G Electronic Communications Base Station
At the Existing Cellnex UK Site

Wendover Road
Manchester
M23 9ER

Project Reference: COL.MOD.UK.0002864
Site Reference: Manchester Wendover Road

CELLNEX UK & EE LIMITED

24th June 2025

1. INTRODUCTION

- 1.1 The following statement is submitted in support of an application for prior approval involving the proposed upgrade of electronic telecommunications equipment on behalf of the Mobile Network Operator 'MNO' EE Limited in conjunction with Mobile Broadband Network Limited 'MBNL'. The application site is operated by Cellnex UK, a radio site infrastructure provider.
- 1.2 The application includes:
- A description of the site and surrounding area
 - A description of the proposal
 - A statement of community engagement
 - A review of planning policy considerations
 - A review of design and access considerations
- 1.3 Other accompanying documents have been submitted in support of the application and these are referred to and should be read in conjunction with this statement.

2. THE SITE AND SURROUNDING AREA

- 2.1 The proposal involves the upgrade of an existing ground-based radio mast which consists of a 17 metre high monopole supporting transmission equipment, namely radio antennas and ancillary equipment. Alongside the monopole sits an equipment cabin and small electrical meter cabinet. All of the apparatus is enclosed by a 2.1 metre high palisade fence.
- 2.2 The site is positioned off Wendover Road in Greater Manchester, some 9 kilometres (5 miles) to the south-west of the City Centre. The base station occupies an area of car park, near to the gable end of a three-storey building which houses commercial units on the ground floor with residential flats above. The surrounding area is predominantly residential and primarily includes modern two and three-storey dwellings. EE Limited are using the installation to provide 4G coverage to the area around Wendover Road.
- 2.3 EE are proposing to carry out some works to their apparatus which involves installing a head frame at the top of the monopole, replacing and relocating radio antennas and installing some ancillary equipment, all of which will be attached to the new head frame. The works are necessary to remove Huawei equipment from the site, a Chinese manufacturer of apparatus, in line with a mandate from the UK Government. In addition, the site alterations will retain 4G coverage with the addition of 5G network services to the benefit of the local area and community. An illustration of the location and installation is situated within Figures 1.1 - 1.3, below.

Figure 1.1 – Aerial image of the radio base station - obtained via [Gridreferencefinder](#)

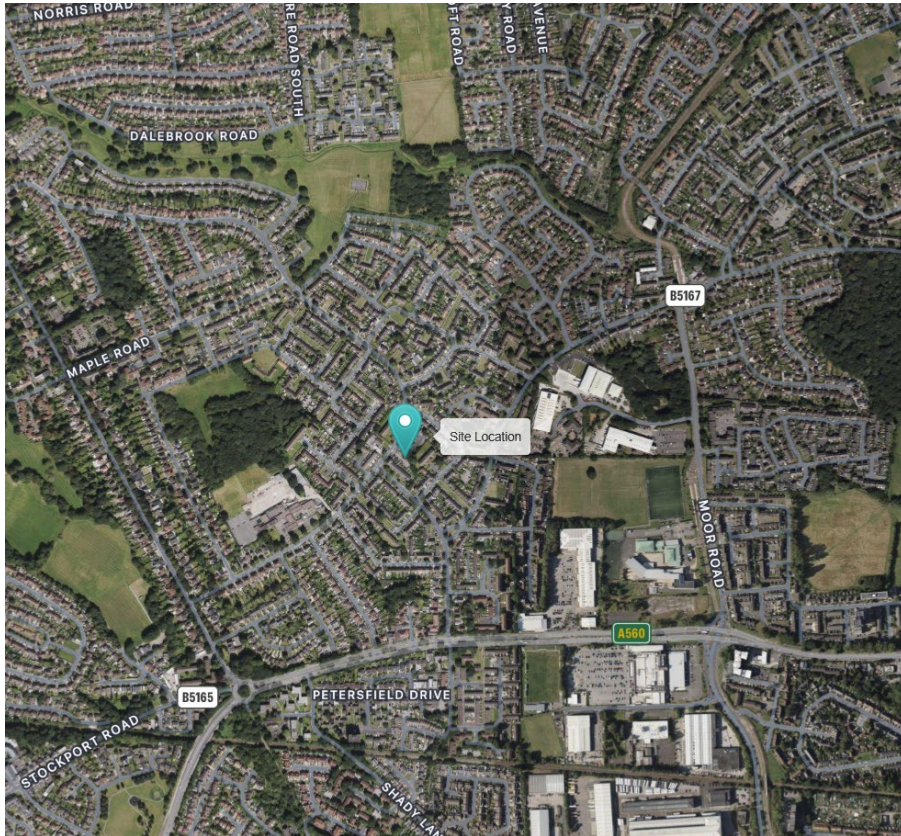
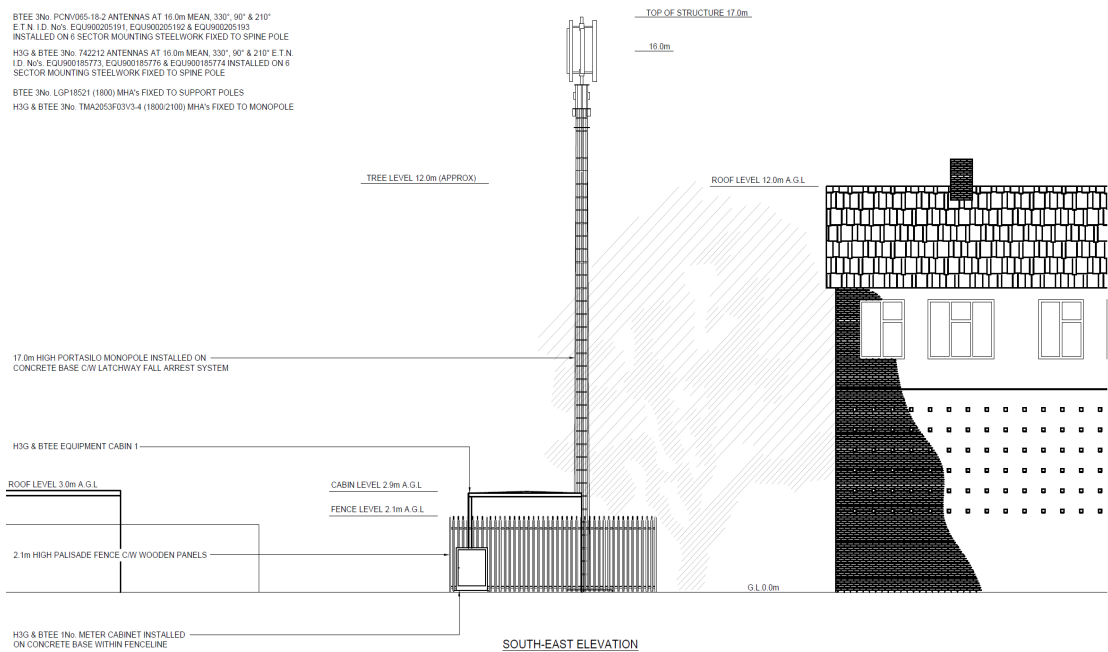
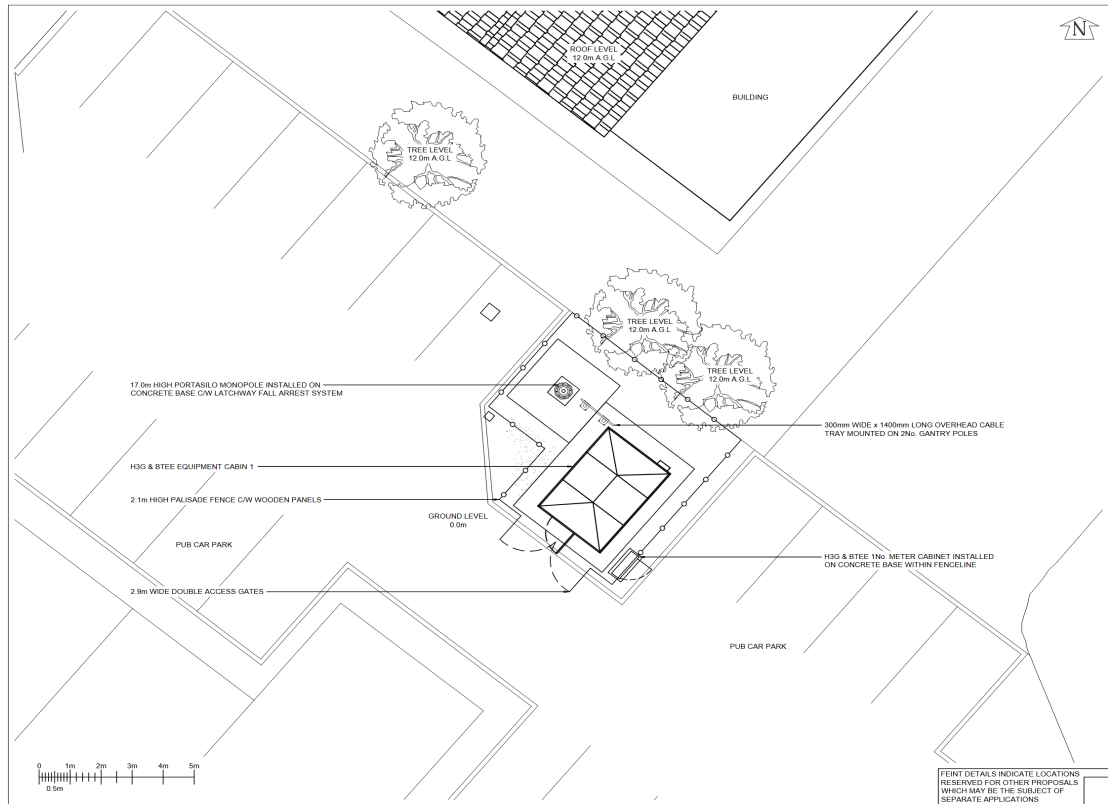


Figure 1.2 – Aerial image of the radio base station - obtained via [Gridreferencefinder](#)



Figure 1.3 – Site plans of the radio base station - extract from the planning drawings.



- 2.4 The transmission equipment (fixed to the monopole) benefits from its elevated position and allows the radio signals to propagate across the surrounding area. In addition, the modest nature of the proposed works will minimise visual impact.
- 2.5 As shall be explored within this document, we consider the least visually intrusive solution has been put forward in terms of completing a minor upgrade to an established base station, rather than introducing entirely new infrastructure (e.g. a new base station) elsewhere within the local area. It is important to note that in addition to being the sequentially preferable solution, the site will fit within the existing network configuration, thereby eliminating the need for further apparatus within the locality. Details of the proposed works are outlined in the following section.

3. THE PROPOSAL

3.1 The proposed development is outlined in more detail upon the drawings (enclosed), within section 3.2 and within Figures 2.1 & 2.2, below. As referenced in section 2.4 (above), the works primarily involve removing Huawei apparatus from the site while maintaining and enhancing network coverage within the local area.

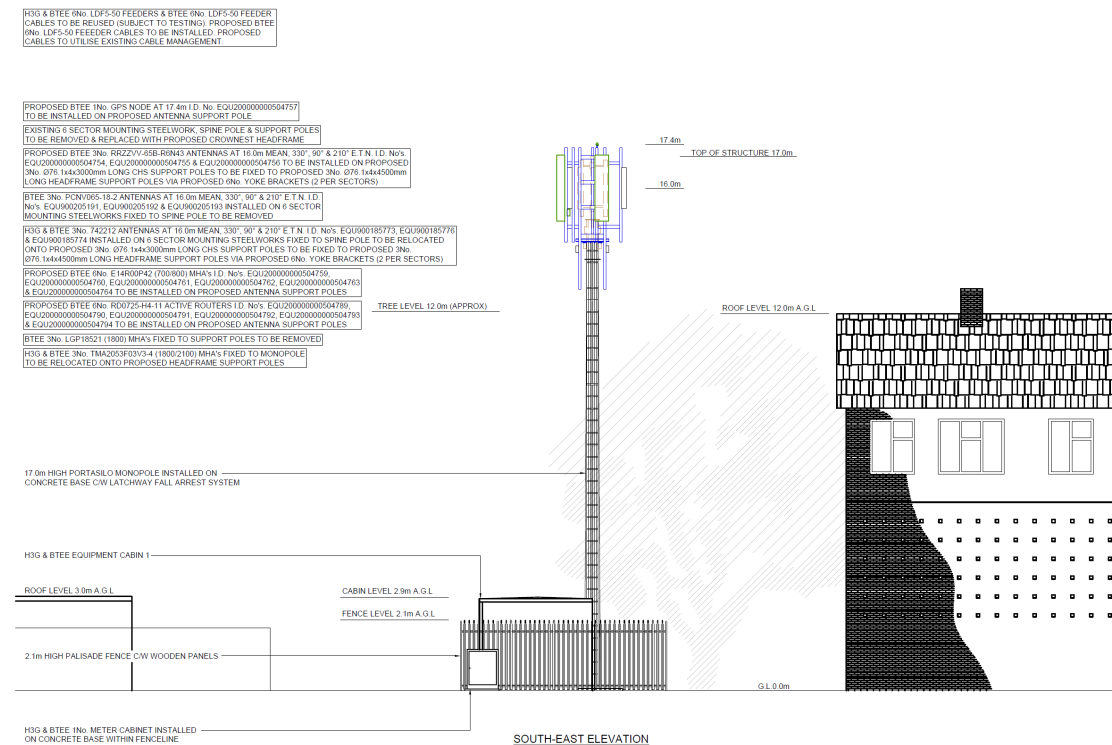
3.2 The following includes a breakdown of the works proposed:

Existing equipment:

- 6no. radio antennas fixed to the existing monopole via support poles at a mean height of 16 metres;
- 6no. Mast Head Amplifiers 'MHAs' (ancillary equipment) attached to the existing monopole;
- Ground based cabin and electrical meter cabinet.

Proposed Upgrade:

- The installation of a new head frame at the top of the monopole. The head frame will accommodate the required radio antennas and ancillary apparatus (detailed below);
- The replacement of 3no. existing antennas with 3no. new antennas. The antennas will be attached to the new head frame, along with the remaining 3no. antennas which will be relocated;
- The installation of a small GPS node, to be positioned on the new head frame;
- The head frame will also support an array of ancillary apparatus including Mast Head Amplifiers 'MHAs' and routers. The equipment is critical in respect of operating the site.



- 3.3 Paragraphs 16 and 17 of the Code of Practice for Wireless Network Development in England, published in March 2022, explains how mobile networks operate. In the annual network rollout information supplied, the operators will have explained their network requirements for 5G and the anticipated use of existing sites, including those owned by site infrastructure providers like Cellnex UK.
- 3.4 The application site has been selected by the operator as it hosts Huawei equipment and is critical in respect of providing reliable network coverage and capacity to the area around Wendover Road which is predominantly residential in nature, while properly meeting national town planning policy objectives for the shared use of existing electronic communication sites, in this case maintained by Cellnex.
- 3.5 For the avoidance of doubt, we propose to remove and replace some of the telecommunications equipment currently in situ, ensuring that connectivity is continually provided to the local area and to further enhance communications with the addition of 5G (Fifth Generation) services to this part of Greater Manchester.
- 3.6 The proposed scheme involves some minor changes to existing telecommunications infrastructure. In accordance with license obligations, advice in the National Planning Policy Framework 2024 and the Code of Practice in England (March 2022), the Operator (EE Ltd) has conformed with the sequential approach to site selection.
- 3.7 As the proposed development seeks to utilise an existing telecommunications site, no alternatives have been considered further. Overall, the proposed scheme is considered to be the optimum solution.

4. PRIOR ENGAGEMENT

- 4.1 The recently revised National Planning Policy Framework (NPPF) and the Code of Best Practice on Mobile Network Development in England require a consultative approach to network development with the planning authority and local community, reflecting the particular sensitivities of any given site. The proposal received an 'Amber' rating when assessed against the traffic light rating model (see Appendix B of the Code of Best Practice).
- 4.2 Despite the established nature of this base station and the minor nature of the planned works, a Traffic Light Rating of Amber was applied due to the nature of the surrounding area which is predominantly residential.
- 4.3 In our engagement letter, we sought to agree with you the appropriate traffic light rating and associated engagement requirements with the local community while obtaining your comments on the siting and design of the development. The letter was sent to the department of planning at Manchester City Council on the 09th June and included a set of drawings and site detail sheet with further information on the proposed works. A response was received from Mr Joshua Lee – Assistant Planning Officer on the 19th June. Without prejudice, Mr Lee considers that due to the presence of the existing pole and minor increase to the head frame size, the proposed scheme should not lead to any further harm when compared with the existing installation, while increasing digital connectivity within the area.
- 4.4 Our best practice engagement with the local community included the submission of a covering letter, pre-application enquiry (site detail sheet) with maps and imagery, along with a set of planning drawings to outline the proposed scheme. The correspondence was sent to the following parties by email on the 09th June 2025:
- Councillor Glynn Evans – cllr.glynn.evans@manchester.gov.uk
 - Councillor Susan Cooley – cllr.susan.cooley@manchester.gov.uk
 - Councillor Dave Marsh – cllr.dave.marsh@manchester.gov.uk
 - Sandilands Primary School – admin@sandilands.manchester.sch.uk
 - Dixons Brooklands Academy – info@dixonsbk.com
 - Manchester Airport Safeguarding – safeguardingman@magairports.com

A response was received from Councillor Susan Cooley upon receipt (09th June), who advised the Wendover Pub is no longer in situ and the site now comprises a small

housing development. Councillor Cooley sought clarification on where the telecommunications site is positioned. Details of the location were confirmed, while Councillor Cooley was directed to the site detail sheet attached to the initial email which amongst other information, included maps and visualisations highlighting the exact position of the apparatus.

A response was also received from the safeguarding department of Manchester Airport who raise no safeguarding concerns. However, we have been given procedures for crane and tall equipment notifications. A copy of the consultation and reply from Manchester Airport Safeguarding is included with this application.

5. PLANNING POLICY

5.1 The relevant planning policy and best practice framework is found principally within:

- The Manchester Local Development Framework – Core Strategy Development Plan (adopted 11th July 2012)
- National Policy, especially the National Planning Policy Framework (NPPF)
- The Code of Practice for Wireless Network Development in England.

5.2 In accordance with these documents, the general policy background that exists for electronic communications development, site specific policies and the key considerations relevant to the siting and design of appropriate electronic communications development can be established. As planning authority, you will be familiar with this framework and so in the interests of brevity, we do not rehearse it back to you in detail. However, we instead address the principal themes to demonstrate that the application accords with them.

Local Policy Considerations

5.3 At a local level, the proposal has been considered against the Manchester Local Development Framework 'LDF' – Core Strategy Development Plan. The plan covers development in the district until 2027, incorporating planning policies which will be used to deliver the Council's vision for the City. No specific and dedicated policy has been identified in respect of telecommunications development. However, telecommunications is referenced within Policy EC 1. An extract of this policy is included below:

[Manchester LDF - Policy EC 1 – Employment and Economic Growth in Manchester](#)

Priorities for ensuring continued economic growth include:

- *Improving access to jobs for all via public transport, walking and cycling;*
- *Demonstrating that employment-generating development has fully considered opportunities to provide jobs for local people, through construction or use;*
- *Improving the portfolio of employment premises, by providing a range of employment sites and premises for small, medium and large businesses;*
- *Improving digital infrastructure delivery to businesses and residents;*

- *Creating business destinations by enhancing the primary business use with ancillary commercial facilities;*
- *Ensuring the continued social, economic and environmental regeneration of the City;*
- *Ensuring connectivity to international markets for the import and export of goods to ensure competitiveness in international markets.*

5.4 In addition to the above and as detailed within our pre-application communication, Manchester City Council has many initiatives aimed at improving connectivity across the City. Digital Inclusion Agenda which was launched in October 2020 is one such initiative. Commenting on this area, the Mayor of Greater Manchester, Andy Burnham has provided the following statement:

“If Greater Manchester is truly going to be a world leading digital city region, we have to make a big commitment to fix the digital divide, the consequences of not doing so are severe – with our people at risk of further social isolation, lack of equal opportunities and not being able to access support. We are ensuring that everyone in Greater Manchester, whatever their age, location or situation, can benefit from the opportunities digital brings. Now is the time where Greater Manchester can lead the way in achieving an ambition that we should all strive for country wide”.

5.5 As already detailed within this document, the proposed works to the existing installation at Wendover Road will allow EE to meet the Government mandate in respect of removing Huawei apparatus, while enhancing connectivity within the surrounding area with the addition of 5G network services. 5G will provide users with access to faster and more reliable communications and is considered to align with the Manchester Local Development Framework and initiatives of the Council by improving communications across the City.

5.6 The works themselves are also recognised as being very minor with the main focus upon a head frame which will be fixed to the top of the monopole, housing radio antennas and ancillary apparatus.

Balancing operational and environmental considerations

- 5.7 The special operational and technical factors that require specific siting of a 5G base station should be balanced by the need to minimise environmental and visual impact.
- 5.8 However, there is now far greater emphasis that visual impact should not override significant radio planning requirements to achieve mobile coverage to a given area, particularly with the need to support the massively growing and intensifying demand for mobile communications across the UK. Indeed, in terms of looking to meet operational needs for 5G, the NPPF now applies a reduced policy test compared to previous guidance. This helps to clarify that an operator is only required to satisfy the normal test of acceptability having regard to all material planning circumstances, rather than looking for the 'optimum' solution as required under the former PPG8.
- 5.9 In balancing these requirements, the starting point for the 5G networks or the expansion of existing networks is to use existing electronic communications sites owned by other operators or radio site management companies such as Cellnex UK. This policy objective is backed with the statutory obligation placed upon operators to share apparatus, where practicable under General Condition 3(4) of the Electronic Communications Code (Conditions and Restrictions) Regulations 2003, as amended.
- 5.10 In respect of Wendover Road, the proposed head frame is required to accommodate apparatus needed to maintain 4G, with the addition of 5G services. The development entails the use of an existing site owned or managed by Cellnex UK which is in operational use and where a mast is already an established feature of the site and wider landscape. Within this context, the proposed alterations will be seen as an acceptable and justified use, reflecting all of the considerations within paragraphs 118 - 122 of the NPPF and:
- The 5G base station is required as part of a national mobile communications network, necessary to extend and improve mobile connectivity to the local area;
 - The target coverage area has been explained and consequently the special operational and technical requirements necessitate siting of a mast within it;
 - All reasonable steps have been taken, through careful siting at an existing Cellnex UK communications site, to moderate the visual impact of the development, having

regard to technical and operational factors. In this case, the monopole is an established and accepted feature within the landscape;

- The proposal to share this existing communication site, through the minor alterations proposed looks to strike the optimum solution, particularly when compared with the alternative of erecting a new base station elsewhere within the local area and the development of an associated compound on a site nearby and with it the associated additional resources in developing a new site.

5.11 The proposed alterations (namely, the new head frame which will be attached to the existing monopole) requires prior approval as the operational needs and associated design of this apparatus means that it falls outside the relevant width and height limitations of outright permitted development pursuant to the Town and Country Planning (General Permitted Development) (England) Order 2015 (the 'GPDO'), as amended. However, the relaxation of permitted development rights within the Amendment Order clearly reflects the Government's strong emphasis towards the reuse and redevelopment of existing electronic communications installations to minimise the need for further structures elsewhere and this proposal clearly follows the emphasis within that particular guidance. The availability of permitted development rights to replace the existing structure must be a material consideration in the determination of the application (and as a 'fall-back' consideration).

5.12 As a matter of principle, the development proposed is in accordance with the relevant policy framework and should therefore be acceptable. In the following section, the Design Considerations are reviewed to demonstrate that the detail of the development is also acceptable and that in accordance with the presumption in favour, approval should be granted.

6. DESIGN CONSIDERATIONS

6.1 The development proposed is exempt from the requirement to provide a design and access statement under Article 9 of The Town and Country Planning (Development Management Procedure) (England) Order 2015. However, to assist your consideration of the detail, the following section provides a description of the process adopted in the design of the proposal and explains the access considerations. Due regard has been given to the factors addressed from Paragraph 20 of the Code of Practice.

Physical Context

6.2 The proposed works have been carefully selected to ensure operational objectives are achieved in terms of maintaining and enhancing coverage within the local area, while minimising visual impact. The scale of the new/replacement equipment is minor in comparison to the overall size and scale of the monopole to which the external equipment will be attached. The position of the equipment will also largely remain unchanged.

Amount, Design, Layout and Scale of the Development

6.3 The scale, layout and design of the development has been guided by the technical and operational factors affecting the need to maintain and enhance 4G, with the addition of 5G coverage, while minimising visual impact. With regards to the main component elements of the development proposed:

- The scale of the apparatus is not large and when installed should look proportionate to the wider structure. The antennas are similar to the existing electronic communications apparatus presently installed upon the tower and will remain at a mean height of 16 metres above ground level. The new/replacement radio antennas and ancillary equipment will be fixed to the existing tower by means of a new head frame which is specifically designed to accommodate this apparatus. The equipment will not therefore appear as incongruous or jarring additions to the mast or look out of place within the context of the surrounding area. No changes are proposed to the monopole itself.

- The mast required cannot be hidden, but any impacts on the landscape and visual amenity will be limited and moderated by confining height to what is required for operational reasons. Compared to other forms of vertical infrastructure also found in the landscape, the mast proposed is a benign structure: it is much lower than the television broadcast masts owned and operated by Arqiva; it is lower and does not form a sting of structures that march across the countryside like pylons; and it does not move like wind turbines, which are typically higher and are usually developed in clusters.
- The amount, size/volume of radio antennas and ancillary apparatus has been kept to the minimum necessary, balancing visual impact with operational requirements. The design of these features is very much driven by operational and technical factors.
- Notwithstanding the external works as already detailed within this document, the associated works shall take place within the existing ground-based cabin. The works primarily involve the installation and replacement of cabinets.

Access Considerations

- 6.4 Vehicular access to the site will be taken from Wendover Road as per the location plan. The route of access will remain unchanged.
- 6.5 Once constructed, the development will be unmanned requiring only periodic visits, typically once every two to three months for routine maintenance and servicing. The number and frequency of visits is expected to remain unchanged.
- 6.6 In accordance with all relevant health and safety legislation and guidelines, access to the site will be restricted to authorised personnel and the routine maintenance and servicing of the apparatus will only be carried out by properly trained and qualified staff. Electronic communications base stations are specifically designed to prevent unauthorised access by members of the public and, therefore, there is no requirement to incorporate inclusive access arrangements into the proposed layout and design of the development.

Landscaping

- 6.7 The proposed siting of the development has been very carefully chosen to minimise environmental impact. Any potential impact of the development is principally associated with the radio antennas, which are the most visible component of the base station, and which cannot be fully screened for operational reasons. The height of the apparatus on the existing tower means that any attempt to screen it in its entirety would be unrealistic in any event. However, it should be noted there will be no increase to the number of antennas as part of the proposed scheme. The number of antennas attached to the installation will remain at six. The mean height will also remain unchanged at 16 metres above ground level.

Appearance

- 6.8 The sensitive approach to siting and design should minimise the appearance of the development proposed. Insofar as the apparatus may be visible, the proposed scheme involves re-using an existing ground-based monopole which is an established feature of the local area. The base station is already host to an array of telecommunications equipment and the works merely involve installing and replacing some of this apparatus.

7. HEALTH AND SAFETY

- 7.1 In support of the application, we include a separate document called '**5G Health and Safety**' which sets out in more detail the associated health and safety considerations. Every installation on a site owned or managed by Cellnex UK will be compliant with international standards adopted by the UK Government. A certificate confirming compliance with the relevant ICNIRP guidelines on public exposure has been supplied with this application.
- 7.2 The ICNIRP guidelines seek to protect against the well-known thermal effects of radio emissions and include a significant precautionary factor. These guidelines apply to all forms of electronic communications and mobile technology is one of the lowest powered of these.
- 7.3 National planning policy remains clear, provided an application is certified as ICNIRP compliant, local planning authorities should not seek to effectively set different guidelines through the refusal of planning permission.

8. SUMMARY AND CONCLUSIONS

- 8.1 In summary, the application involves the minor upgrade of equipment upon an established radio base station which includes the installation and replacement of certain telecommunications equipment.
- 8.2 The service provided by the operator is in the public interest and is in very high demand with 5G being the next and highly significant advancement in mobile connectivity. In the UK there are now more than 111 million subscriptions to mobile networks and mobile services now exceed fixed landlines in terms of customer numbers and usage.
- 8.3 The public interest of the system is clear from the considerable benefits that will flow and it makes a significant and major contribution towards sustainable objectives.
- 8.4 The works are required to remove and replace Huawei telecommunications apparatus in line with the operators licence obligations, maintaining 4G with the addition of 5G network coverage which will benefit the local area around Wendover Road.
- 8.5 The operator has followed national and local planning policy and best practice guidance in the siting and design of its apparatus in recognition of the need to minimise visual impact. This has included:
- Network planning based upon existing sites, including those controlled by Radio Site Management companies like Cellnex UK.
 - The minor upgrade of an existing radio site, compared with the deployment of an entirely new installation elsewhere within the local area and with it, the additional resources needed to develop a site.
 - Engagement in accordance with the Code of Practice procedures.
 - An examination of design options to minimise potential visual impact.
- 8.6 The proposed antennas will comply with all relevant health and safety requirements and will be compliant with the ICNIRP guidelines. There are no exceptional circumstances in this case and there is no requirement to consider further, the health effects and related concerns such as the perception of risk.

- 8.7 This statement and the other accompanying material has demonstrated that the proposal accords with local Development Plan policy and national policy set out in particular within the NPPF. In particular, it is a form of development that is specifically encouraged as a matter of principle and in its detail, complies with the policy objective of minimising potential environmental impact.
- 8.8 In conclusion, the application is for sustainable development, acceptable as a matter of principle and appropriate in its detail and development which the presumption in favour of granting approval applies.