

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	NATIONAL CYCLING CENTRE	Site Address:	NATIONAL CYCLING CENTRE STUART STREET MANCHESTER M11 4TE
National Grid Reference:	E:387423 N: 398926		
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:		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	No
Date of pre-application contact:	7 th February 2025
Name of contact:	N/A
Summary of outcome/Main issues raised: No comments were received in relation to the proposal prior to submission.	

Annual area wide information to planning authority

¹ Macro or Micro

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

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Has annual area wide information been provided?	No
If no explain why:	
Summary issues raised: Cornerstones commercial relationship with VMO2 has changed, effectively increasing our independence to work with other companies in the deployment of mobile infrastructure. It means we no longer have visibility of 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	
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Outline of consultation carried out:

Consultations were undertaken with Clayton and Openshaw Ward Councillors:

Meeting Room 2 at Clayton Sure Start (the Wells Centre)
Clayton Sure Start Centre
101 North Road
Manchester
M11 4NE

cllr.donna.ludford@manchester.gov.uk
cllr.sean.mchale@manchester.gov.uk
cllr.thomas.robinson@manchester.gov.uk

A notification of the proposal was also issued to the local MP:

MP Lucy Powell
House of Commons
London
SW1A 0AA
contact@lucypowell.org.uk

Consultations were also sent out to The National Cycling Centre (Stuart St, Manchester M11 4DQ) and local 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:

To date, no correspondence has been received.

School/College

Location of site in relation to school/college:

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Prior to the submission of this application, pre-consultations were initiated with:

Ravensbury Street Primary School
Tartan St,
Manchester
M11 4EG

Mrs Maureen Hughes – Headteacher
Chair of Governors Mr Adam Woof
admin@ravensbury.manchester.sch.uk

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 to date from those consulted.

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:	26 th February 2025	

3. Proposed Development

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The proposed site:

Cornerstone is the UK's leading mobile infrastructure services company who acquire, manage, and own over 20,000 sites and are committed to enabling best in class mobile connectivity for over half of all the country's mobile customers.

At present it is paramount that digital connectivity is supported and maintained throughout the country. In particular the current massive shift in user demand from city centre and places of work to residential areas and suburbs, requires an improvement in coverage and capacity throughout the whole network.

The existing installation currently servicing the area is 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 currently hosting 4 MNO's 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)

Cornerstone is in the process of progressing a suitable new site in the Clayton area for a radio base station capable of providing Virgin Media O2 (VMO2), formerly known as O2, prior to its merger with Virgin Media, with the latest 4G and new 5G technologies. Due to VMO2's license obligations, they are required to provide the

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most UpToDate network service to their customers as such the operator seeks to upgrade their equipment.

Due to the weight of the new technologies being deployed, the existing structure has failed the Global Design Check (GDC) and has been confirmed as incapable of hosting the load bearing of the new required upgrade technologies.

To make the existing installation location viable it would need to be replaced by a more structurally robust taller structure (25m – 30m) to support the additional weight and to allow for the requisite separation distances between each technology (3G, 4G and 5G) and further for these to be separated out for all 4 MNO's (Three UK, EE Ltd, Vodafone Ltd and VMO2).

It is considered that introducing a taller structure at this location would have a greater impact to on looking residential amenity and would not be compatible with the regeneration proposals for East Manchester by reason of its size and location, contrary to the development plan. Increasing the height of the existing structure would result in an overbearing visual impact on the area. Previous proposals to upgrade this installation and increase the height have previously received planning refusal.

As the existing structure cannot be upgraded it will remain in place for the host operator MBNL (Three Uk and EE Ltd) and Vodafone remaining.

The new VMO2 installation is required near the existing installation to ensure customer network coverage is continued and replicated and to provide new upgraded 4G technologies and a new 5G service.

The proposed new site is located on the adopted highway pavement of Fairclough Street, at the corner with the entrance to Stuart Street Residential area. The installation will be positioned along the metal palisade fencing. There are no residential properties onlooking the site and it is positioned off any main road route on a back street near the pedestrian entrance to Phillips Park.

10m high trees and dense shrubbery provides a backdrop to the site and helps to soften visual assimilation with the local street scene. Please see below **Figure 2** which illustrates the application site in relation to the existing installation at Norweb Sub Station and **Figure 3** which shows an aerial view of the proposed site location, as well as **Figure 4** showing views from the street scene.

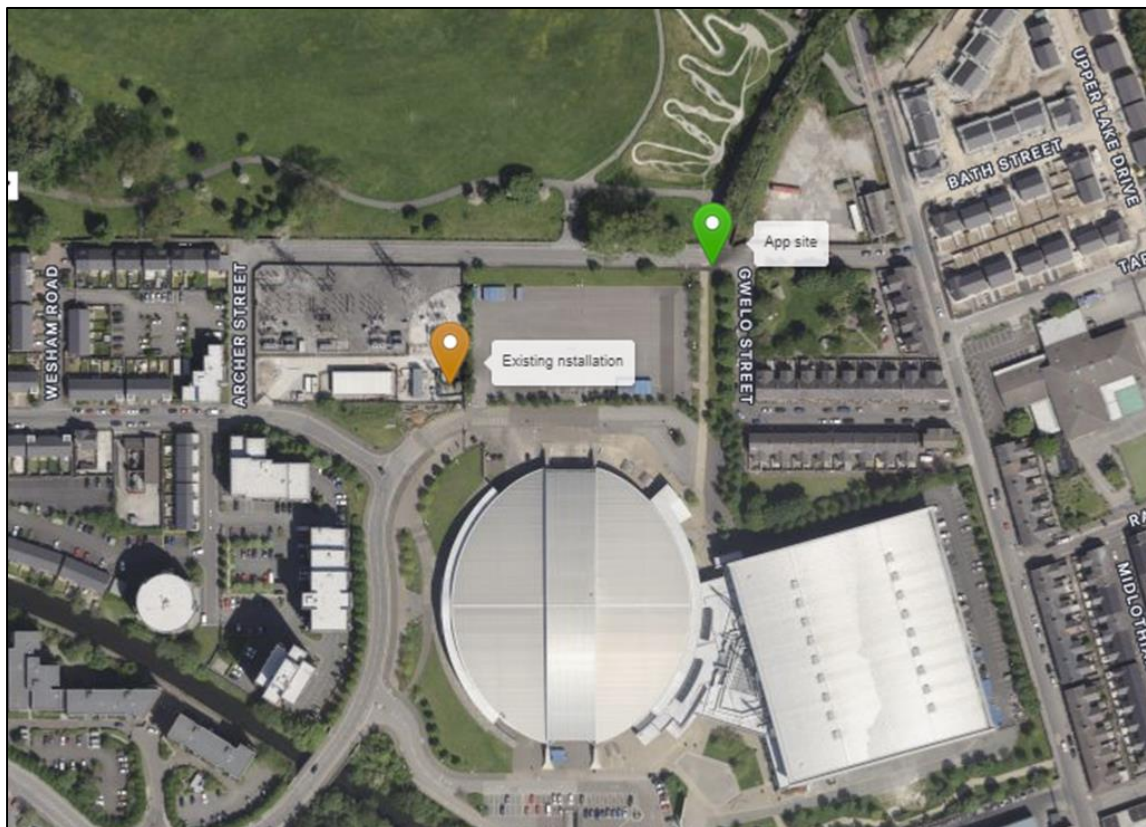
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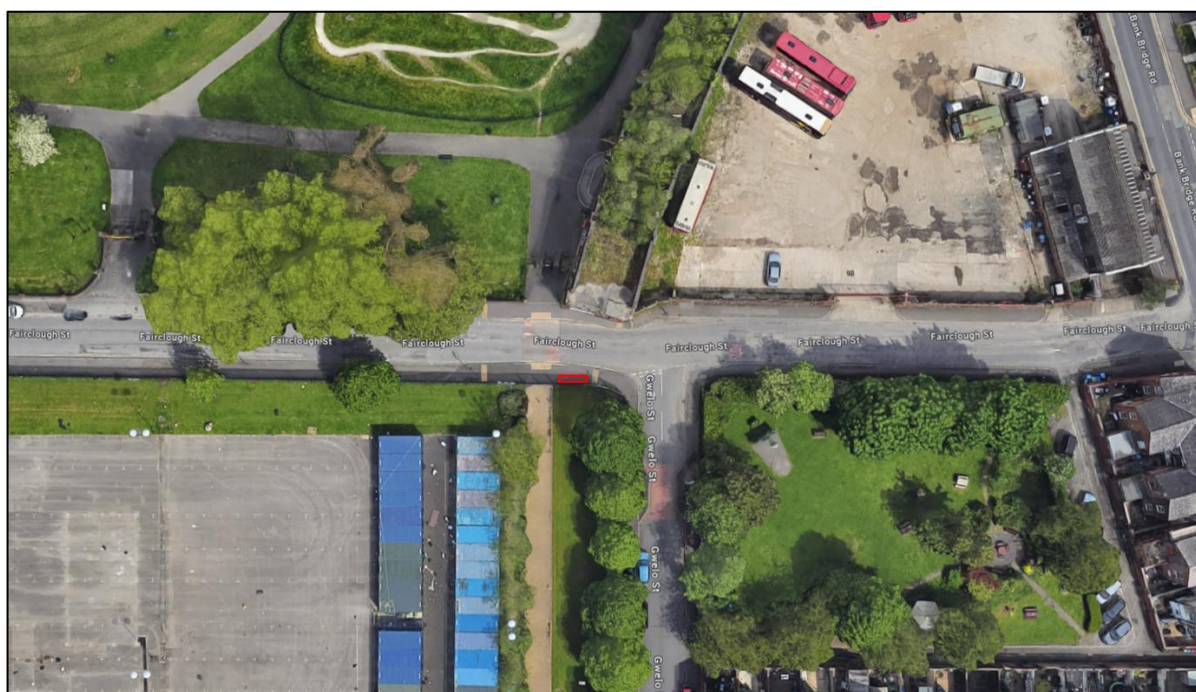
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(Figure 2: Aerial View of application site in relation to the existing installation)



(Figure 3: Aerial view of application site)

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(Figure 4: Streetview of application site)

The proposal comprises a 20m high slim line street works monopole, accommodating 6 antenna and 2no. dishes. The pole and cabinets will be tucked against the existing palisade fence, ensuring sufficient space is left for pedestrian and wheelchair/pram movement.

The proposed location does not fall within an area of conservation and is not within proximity to listed or locally listed buildings, scheduled monuments or their settings.

The proposed structure, although taller than the surrounding existing elements, 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

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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.

Each telecommunications site connects to another to create a network. If one network cell is not operating efficiently this places greater pressures and demand in surrounding locations, causing disruption to the entire network. After thorough investigation by the applicant's acquisition and design agents it has been concluded that the application site is the optimal solution within the local area which would provide the level of upgraded coverage required on balance with town planning considerations and sensitivities of the local area.

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

Coverage plots available upon request

Type of Structure:

Proposed installation of a 20.0m high Orion Streetpole, with 6no. stacked antenna (3no. on top, 3no. below), 2no. 0.3m dishes and proposed 1no. Yorkshire equipment cabinet

Overall, Height:	20m AGL
Height of existing building (where applicable):	N/A
Equipment Housing:	
Depth:	York Cabinet 600mm Shire Cabinet 600mm
Width:	York Cabinet 1900mm Shire Cabinet 1050mm

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Height:		York Cabinet 1750mm Shire Cabinet 1750mm
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:	RAL 7035 – Light Grey. Unless otherwise specified by the LPA	

Reasons for choice of design:

Once it was determined that a new ground-based structure was to be progressed, both lattice design and monopole or 'street pole' design solutions were considered. It was naturally considered that the most appropriate and sympathetic design solution within the industrial/commercial area of was the progression of a monopole design. The monopole design has been chosen to ensure that it will assimilate with the immediate surroundings and the context in which it will be seen. The single radio equipment cabinet and its 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.

Height

The proposed height of 20m is the technical minimum to fulfil technical and operational requirements:

- **Coverage:** Essential to achieve high-quality, reliable coverage to the desired area and replace the existing coverage footprint thereby reducing the need for another mast in the area and the proliferation of masts in locality.
- **Clutter:** The height of the proposed pole enables the antennas to surmount the surrounding urban 'clutter' to avoid interference and impact on mobile signal quality. Features of the surrounding environment must be cleared so the antenna can 'see over' any obstructions so they do not block the signals from the antennas. The antennas are located in 'dual-stack' formation – 3 antennas stacked a top of each other. The underside of the lower set of antennas sits at 17.8m AGL. Therefore, if the pole were lower, the antennas would not as effectively be able to provide high-quality coverage to the target area. As a result, there would be risk of coverage gaps and the need for another mast in the area contrary to planning policy.

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- **ICNIRP Compliance:** Ensures compliance with site-and-technology-specific ICNIRP public exposure certifications; and
- **5G technologies:** New 5G radio technologies operate in higher frequency bands than older technologies. Since it operates at higher frequencies where attenuation of the radio signal is naturally higher, and the effects of clutter are greater it will normally require a higher structure to achieve the same coverage footprint. Furthermore, to increase capacity and data speeds for users, the antenna will normally need to be mounted higher than conventional antennae. These factors drive a requirement for an increase in antenna height in 5G.

The height requirement of 20.0m is necessary to replicate the existing coverage which is provided from the existing structure at Norweb. The height of the structure is the minimum possible to meet the operational and technical requirements of the surrounding cell, to ensure compliance with site specific ICNIRP certifications and to overcome the surrounding built and natural environment blockers byway of buildings and trees. It is considered that the proposed height and therefore the associated visibility of the scheme does not outweigh the overall public benefit.

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 physics of RF creates technical constraints that must be overcome – this directly dictates siting and design of infrastructure. Higher RF means significantly more data can be transmitted, but it cannot propagate as far or through material as well. It is a necessity that replacement sites are sited directly within the target service area (search area will be smaller) and are sufficiently tall to see over trees/buildings/topography that will impact propagation.

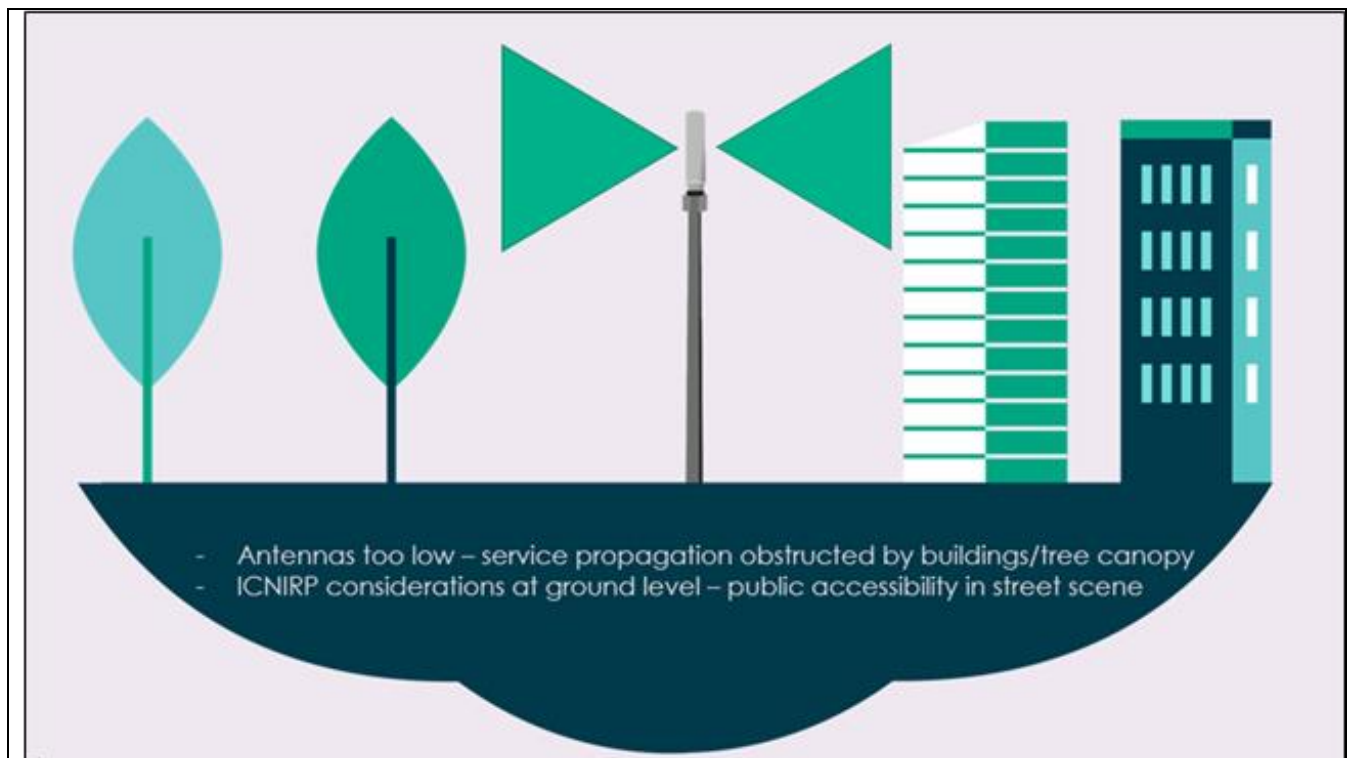
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(Figure 5: Infographic illustrating monopole height requirements in the street scene.)

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.

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.

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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.

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 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 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. VOXI, ASDA Mobile, Lebara, and Talkmobile are on the Vodafone 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

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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.

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'.

It is acknowledged that a nearby residents would be able to view the mast from surrounding residential properties, however, the majority will be viewed either through or within the backdrop of existing landscaping and built environment. It is considered that the residential properties in the immediate area will not face directly to the site, due to intervening built environment and mature street scene trees.

The site is accessible and has power availability. There are no underground services impeding on the development. It is of note that the proposed location does not fall within Article 2(3)-(4) land or any statutory or locally listed heritage assets and their settings.

The site selection is in accordance with Code of Practice for Wireless Network Development in England.

The following sites in **Section 5** were investigated for their potential to accommodate a telecommunications base station installation, however, for the reasons detailed below, the locations sought were subsequently discounted in favour of the Proposed Site.

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'*.

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The main issues arising from this prior approval notification 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 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.

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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.

The layout of the surrounding built environment presents significant challenges due to the density of low-rise residential developments coupled with the topography meaning 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 characteristics of telecoms sites are that they must be environmentally suitable, capable of being developed (e.g., ground conditions) and safe and secure.

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 and as such there are very limited rooftop sites to consider. The residential areas falling to the west and east were discounted due to its dense residential nature with low lying, pitched rooftops.

Further there are no large commercial buildings or tall built structures of sufficient height which could be utilised to host the required replacement upgrade apparatus.

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:

Upgrading their own existing base stations.

N/A – the existing apparatus can not be utilised

Using existing telecommunications structures belonging to another communications operator. i.e. Mast and/ or site sharing, co-location.

N/A – There are no existing communications sites in the area which would be able to host additional communications apparatus due the extent of technologies to be accommodated. 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 for those cell areas. This would result in an overlap of coverage and would simply cover an area

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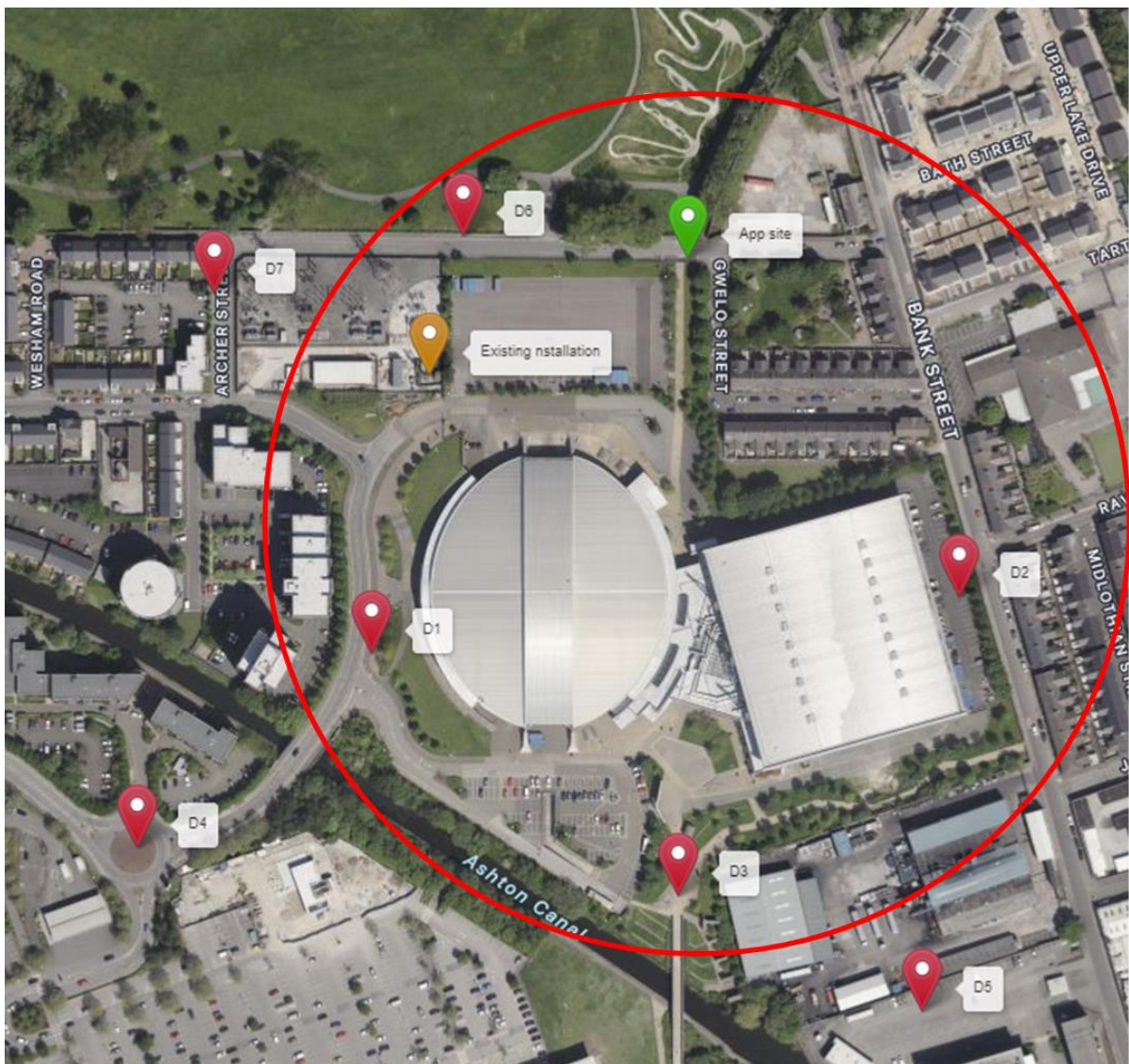
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already covered and not the target area. This would cause interference, being too far removed from the intended target area where the specific network coverage is required.

Installations on existing high buildings or structures including National Grid pylons.
N/A None available in the search area

To maintain existing coverage, the search for a replacement is constrained to within the cell area 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.



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The following sites were investigated for their potential to accommodate a replacement site, however for the reasons detailed below, the locations sought were subsequently discounted in favour of the proposed site on Hall Street.

Site Name and address	NGR	Reason for not choosing ⁴	Option
Gibbon St (SW) Gibbon St Manchester M11 4TE	Eastings 387282 Northings 398752	T - Technical Difficulties A location on Gibbon Street was investigated for its potential to host a street works installation. However, an installation in this location would be blocked by the height of the residential apartment block to the west along Stuart Street. As such from an operational perspective an installation along this road has been discounted.	D1
Velodrome British Cycling Car Park Stuart St Manchester M11 4DQ	Eastings 387543 Northings 398776	P - Planning A greenfield structure was proposed in the staff car park to the rear of the Velodrome Centre; however the location is within close proximity of residential properties to the rear along Bank Street. Further there was also concerns raised by the transmission team regarding the steel support structure of the Velodrome hampering signal transmission. As such this location was discounted.	D2
National Cycling Centre Walkway Stuart St Manchester	Eastings 387418 Northings 398644	T - Technical Difficulties The pedestrian pathway through the National Cycling Centre Complex was investigated for its potential to host the apparatus however it was considered there would be more sympathetic	D3

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M11 4DQ		locations with less detriment to the amenity of the complex available. As such this area was discounted in favour of the location on Fairclough Street.		
Gibbon St roundabout (SW/GF) Gibbon St Manchester M11 3JA	Eastings 387178 Northings 398666	O - Other A new installation in this location would be too far west of the current location and as a result would be too close to the existing operational site 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.	D4	
Greater Manchester Police, Bradford Park Complex 3 Bank St Manchester M11 4AA	Eastings 387526 Northings 398593	T - Technical Difficulties A new installation in this location would be too far west of the current location and as a result would be too close to the existing operational site 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. Additionally, as the location is within the police station it may present a security risk for personnel needing to access the equipment for maintenance.	D5	
Fairclough St.		T - Technical Difficulties	D6	
Fairclough St.	Eastings			

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Manchester M11 4DQ	387323 Northings 398936	The Street pavement in this area is too narrow to host the apparatus and would not allow for the minimum clearance for wheelchair/pram users. As such this area has been discounted from a safety and build perspective.		
Archer St (SW) Archer St Manchester M11 4SZ	Eastings 387213 Northings 398911	T - Technical Difficulties The Street pavement in this area is too narrow to host the apparatus and would not allow for the minimum clearance for wheelchair/pram users. As such this area has been discounted from a safety and build perspective. The location also is close to residential properties and would be more impactful to amenity than the chosen location.	D7	

The alternative locations considered have been discounted in favour of the application site which offers balance to the network objectives of securing a viable site and limiting harm to the local character and setting within which a site must be accommodated.

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 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 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.

National Policy and Guidance

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The Government's latest thinking continues to strongly support communications infrastructure. The NPPF remains very supportive of high-quality communications. Indeed, a whole chapter (10) is dedicated to high-quality communications, emphasising the importance that the Government attaches to digital connectivity to contribute to a well-functioning society.

118. Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G)(...). Policies should set out how high-quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; (...)

The proposal fully complies with the guidance set out in the NPPF. The proposed development will provide 5G. The Government is already forward-thinking the evolution of data networks and seeks planning decisions to take account of this. 5G technology provides increased speed of data and more capacity in the network, to ensure that handheld devices can continue to be used for the purposes in which they were purchased. Furthermore, will provide the appropriate network for smart applications. This will bring even greater economic and social benefits to the area.

119. 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 (...)), equipment should be sympathetically designed and camouflaged where appropriate.

The discounts table above evidences that the applicant has thoroughly explored the possibility of erecting antennas on an existing building, mast or other structure and found there to be none which are suitable. The proposed siting is considered to not have an adverse impact on the character and appearance of the area and sought to minimise visual impact so far as practicable compared to other ground-based options.

120. (...) They should ensure that: a) they have evidence to demonstrate that electronic communications infrastructure is not expected to cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and b) (...).

There is no airfields in proximity to the site.

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121. Applications for electronic communications development (including applications for prior approval under the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development. This should include: a) the outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed near a school or college, or within a statutory safeguarding zone surrounding an aerodrome, technical site or military explosives storage area; and b) for an addition to an existing mast or base station (...) c) for a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure and a statement that self-certifies that, when operational, International Commission guidelines will be met.

Consultation is detailed in section 2 of this statement.

Para. 122 relates to determining planning applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.

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

The NPPF continues to provide guidance on decision-making. At Para. 38 it states that:

38. Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including...permission in principle, and work proactively with applicants to secure developments that will improve the economic, social, and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.

The NPPF builds on the aspiration to build a strong, competitive economy. **Para. 81** states:

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

Footnote 42 of the NPPF states the following which supports the development of Advanced, high quality and reliable communications infrastructure:

The Government's Industrial Strategy sets out a vision to drive productivity improvements across the UK, identifies a number of Grand Challenges facing all nations, and sets out a delivery programme to make the UK a leader in four of these: artificial intelligence and big data; clean growth; future mobility and catering for an ageing society. HM Government (2017) Industrial Strategy: Building a Britain fit for the future."

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**:

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.

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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.

The Local Government Association's 'Councillor's Guide to Digital Connectivity' notes that a survey conducted by the Confederation of British Industry found that 81% of firms said that they see more reliable mobile connectivity as essential. Studies have also shown that mobile broadband is associated with positive impacts nationally, such as higher GDP and increased employment. The Guide also notes that digital connectivity has become part of the fabric of everyday life, as important to communities and businesses as a water, gas or electricity connection.

Smart City Agenda

The way 5G works, is intricately connect with the Smart City agenda and will enable centralized control of many different street infrastructure 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.

A councillor's guide to digital connectivity – published by the Local Government Association, September 2019

With better access to high speed and reliable broadband and mobile connections, local communities can access public services more conveniently and purchase goods online at a lower cost. People can work from home, cutting out their commute and improving their quality of life. Businesses can grow, become more productive, sell their products in a global market and access a raft of services not available to those offline. Tourists can find out more information about local attractions and share photographs of their experiences with friends and on social media. In contrast, areas stuck in the digital slow lane are less attractive places to live, work and visit, and risk being left behind as other areas reap the benefits of our digital revolution

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5G will enable exciting new services and applications including:

- faster mobile broadband and a more consistent experience in congested areas with a very high number of devices
- industrial applications, enabling businesses to improve their productivity, for example through predictive maintenance and real-time analytics
- Internet of Things (IoT) services, many of which will help councils and businesses deliver services more efficiently including:
 - transport and logistics: connected parcels and fleet tracking
 - health and social care
 - environmental monitoring: sensors monitoring air quality and water pollution in real-time
 - smart agriculture and smart animal farming, smart retailing
- connected and autonomous cars: allowing cars to communicate with each other,
- other road users and even the road infrastructure

Lack of Coverage

Mobiles can only work with a network of base stations in place where people want to use their mobile phones or other wireless devices. Without base stations, the mobile phones and other devices we rely on simply won't work.

Without this new radio base station, the operator's customers would experience increasing numbers of dropped calls and buffering unable to access the internet on their handheld devices. They would also not be able to access the 5G network, a demand which is increasing rapidly as customers update their handheld devices to ones that are 5G compatible. Roll-out of 5G is encouraged to provide pervasive, affordable, resilient digital connectivity. If the 5G network is not available, then the customers' would not be able to utilise these handheld devices for the purposes in which they were purchased. This would be contrary to the aspirations of Central Government which aspires to everyone having access to the superfast highway network wherever they are and being a world leader in 5G.

The demand for mobile data in the UK is increasing rapidly, and as households and businesses become increasingly reliant on mobile connectivity, the infrastructure must be in place to ensure supply does not become a constraint on future demand.

An installation in this location will fill the current lack of the latest high quality service provision and enable VMO2 to maintain access to their handheld devices wherever they are for the purposes in which they were purchased. This is fully in line with the Government's aspirations that everyone has access to the superfast communications network, the NPPF and the Infrastructure Framework Strategy.

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Health and Safety

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

Residential Amenity

The proposal has been sited and designed to minimise impact on residential amenity so far as practicable. The proposal is within a setting of commercial units.

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, odor, 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.

Highways

There is no relevant visibility splays, and the installation is not located on adopted highways land.

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.

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The proposed site is located within a predominantly residential setting however due to careful placement; no properties will face the installation and will be screened by intervening built environment and streetscape landscaping, softening visibility. The site is also confined to a single lane back road with limited footfall, away from main road views, further mitigating potential amenity impact.

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.

There are no forward-facing habitable windows on looking the site, as such impact to residential amenity has been reduced as far as reasonably practicable.

The site is accessible and has power availability. There is no underground services impeding on the development. It is of note that the proposed location does not fall within Article 2(3)-(4) land or any statutory or locally listed heritage assets and their settings.

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 have not been removed entirely, they have 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.

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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. 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 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.

Planning Balance

Drawing all these matters together, the benefits of the proposals 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.

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

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Signed:	<i>Sarah McCorry</i>	Date:	26 th February 2025
Position:	Senior Planning Manager		(on behalf of Cornerstone)

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