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PLANNING HERITAGE, DESIGN AND ACCESS STATEMENT

Site Ref:	91304	**Applicant:**	VMO2
NGRs:	E 383972 / N 397545	**Date:**	12 December 2024
Site Name:	Manchester Ritz	**Type:**	Listed Building Consent
Site Address:	**AT O2 RITZ, MANCHESTER, WHITWORTH STREET MANCHESTER M1 5NQ.**		
Proposal:	The installation of 10 No. small cells positioned internally within the building, the installation of 1 No. external GPS node, the installation of 1 no. equipment cabinet positioned internally and ancilliary development thereto.		
Planning Agent:	Avison Young (UK) Limited		
LPA:	Manchester City Council		

Avison Young (UK) Limited registered in England and Wales number 6382509. Registered office, 3 Brindleyplace, Birmingham B1 2JB. Regulated by RICS

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Overview

Avison Young are planning consultants acting on behalf of Virgin Media National Networks Limited and Telefonica UK Limited to submit the application contained herein for proposed telecommunications development.

Enclosed you will find an application for Listed Building Consent prepared on behalf of Virgin Media National Networks Limited and Telefonica UK Limited who is a licensed operator that provide Cellular Network based upon the Global System for Mobile (GSM) standard and Universal Mobile Telecommunications System (UMTS) within the United Kingdom.

The supporting documents submitted with this application are as follows:

- Application Form (as generated through Planning Portal)
- Application Fee

Drawings 91034 100A, 200A, 300A,301A, 302A,303A,400A pack issue A. 91034_NET_VMO2_DDR_34 , 91034_NET_VMO2_DDR_35 91034_NET_VMO2_DDR_1, 91034_NET_VMO2_DDR_2, 91034_NET_VMO2_DDR_5, 91034_NET_VMO2_DDR_6, 91034_NET_VMO2_DDR_7 , 91034_NET_VMO2_DDR_8, , 91034_NET_VMO2_DDR_9, , 91034_NET_VMO2_DDR_12, 91034_NET_VMO2_DDR_13, 91034_NET_VMO2_DDR_14, 91034_NET_VMO2_DDR_15, 91034_NET_VMO2_DDR_16, 91034_NET_VMO2_DDR_17, 91034_NET_VMO2_DDR_18, 91034_NET_VMO2_DDR_19, 91034_NET_VMO2_DDR_20, 91034_NET_VMO2_DDR_21, 91034_NET_VMO2_DDR_22, 91034_NET_VMO2_DDR_23, 91034_NET_VMO2_DDR_24, 91034_NET_VMO2_DDR_25, 91034_NET_VMO2_DDR_26, 91034_NET_VMO2_DDR_27, 91034_NET_VMO2_DDR_28, 91034_NET_VMO2_DDR_29, 91034_NET_VMO2_DDR_30, 91034_NET_VMO2_DDR_32, 91034_NET_VMO2_DDR_33, 91034_NET_VMO2_DDR_34 , 91034_NET_VMO2_DDR_35, 91034_NET_VMO2_DDR_36, 91034_NET_VMO2_DDR_37, 91034_NET_VMO2_DDR_38, 91034_NET_VMO2_DDR_39, 91034_NET_VMO2_DDR_40, 91034_NET_VMO2_DDR_41, 91034_NET_VMO2_DDR_49, 91034_NET_VMO2_DDR_50, 91034_NET_VMO2_DDR_51, 91034_NET_VMO2_DDR_56,
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Planning, Design and Access Statement

- ICNIRP Certificate

We trust you will find the enclosed information sufficient to register and validate this Listed Building application. Should you require any further information please direct your queries to the below contact.

Contact Details:

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1. Introduction

1.1. Background

Virgin Media Limited is a telecommunications company from Britain, founded in 2007, which provides telephone, television and internet services in the United Kingdom. It is owned by Virgin Media O2, a 50:50 joint venture between Liberty Global and Telefónica.

Telefonica UK Limited, trading as O2 is a British telecommunications services provider. It is owned by VMED O2 UK Limited, a 50:50 joint venture between Telefónica and Liberty Global.

1.2. Public Benefits

The proposed works subject to this application are to provide bespoke 4G and 5G coverage to this music venue to ensure that the building has sufficient coverage even when there is an event on to ensure safety for everyone in the building and to ensure if there was an emergency that the emergency services could be contacted.

It is evident that mobile phone usage has grown exponentially over recent years as more than 90% of the population now own a mobile phone. Customers expect to be able to use their mobile phones and tablets in all locations as these devices have become intrinsic to our personal and professional lives and in this particular instance due to the concentrated levels of users in a small location the existing network is unable to cope. The small cells will therefore improve the capacity in the building by providing a bespoke coverage solution for this venue.

1.3. Sustainability

Following COP26 there is a greater emphasis on considering the effects of future developments on sustainability and climate change. This is a material consideration for local planning authorities, and it is therefore essential to highlight the positive effects of telecommunications development on such environmental matters. In relation to this, Mobile UK published a report entitled *Connectivity and Climate Change: How 5G will help lay the path to net zero*[1] released in October 2021. The report details a number of areas in which 5G technology will help to mitigate climate change as it supports key industries such as healthcare, manufacturing, agriculture, transport and energy to reduce their environmental footprints. 5G technology will allow energy production and energy use to be better monitored and planned; transport infrastructure will be smarter, meaning cleaner, shorter journeys; manufacturing production processes will be less wasteful; agricultural practices will minimise their negative environmental consequences; and healthcare services will be improved through the use of remote consultancy and other telemedicine innovations.

In a general sense, 5G will allow a greater efficiency in its own right when considering the consumption of energy and other resources. For example, one kilowatt-hour (kWh) of electricity is required to download 300 high-definition movies in 4G, but one kWh in 5G can download 5,000 ultra-high-definition movies. The monitoring capabilities that digital communications can offer allow usage rates to be closely monitored, which in turn leads to more efficient planning to save energy and lower carbon emissions. A fast and strong digital connection is required to facilitate

[1] https://www.mobileuk.org/news/cop26-landmark-report-highlights-how-5g-will-help-lay-the-path-to-net-zero

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these means meaning the rollout of upgraded technology is necessary to continue the growth and development of areas locally and nationally.

Mobile operators are also making efforts to use renewable energy in their operations with a global ambition of reaching net zero emissions by 2050. Each individual code operator has set their own goals and business models for low carbon emissions to target innovative ways to reduce the dependency on fossil fuels. Such initiatives include adoption of zero carbon vehicles, increase the use of renewable energy, reduction of single-use plastic and other active engagement with suppliers and customers to reduce their overall footprint.

1.4. Site Selection

This is a bespoke solution for a venue that attracts a high usage. The existing infrastructure in the area is unable to cope with the additional users on the network which results in dropped calls or not being able to join the network. By creating a bespoke coverage solution for this particular venue it reduces the demand on the existing network.

For this reason no alternative sites have been considered.

1.1. Application Site Details

The Ritz Manchester is Grade II Listed but is not situated within designated Article 2(3) land. The building is situated in a predominantly commercial area, although there is residential blocks immediately adjacent and is located within the heart of the city centre and close to Oxford Road Station.

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Above is the host building:



Above is the host building in context.

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The building is Grade II listed, the following details of the listing below are taken from Historic England –

Official list entry
Heritage Category:
Listed Building
Grade:
II
List Entry Number:
1254888
Date first listed:
06-Jun-1994
List Entry Name:
THE RITZ DANCE HALL
Statutory Address 1:
THE RITZ DANCE HALL, WHITWORTH STREET WES

Location
Statutory Address: THE RITZ DANCE HALL, WHITWORTH STREET WEST
The building or site itself may lie within the boundary of more than one authority.

District: Manchester (Metropolitan Authority)
Parish:Non Civil Parish
National Grid Reference:SJ 83969 97550
Details
MANCHESTER

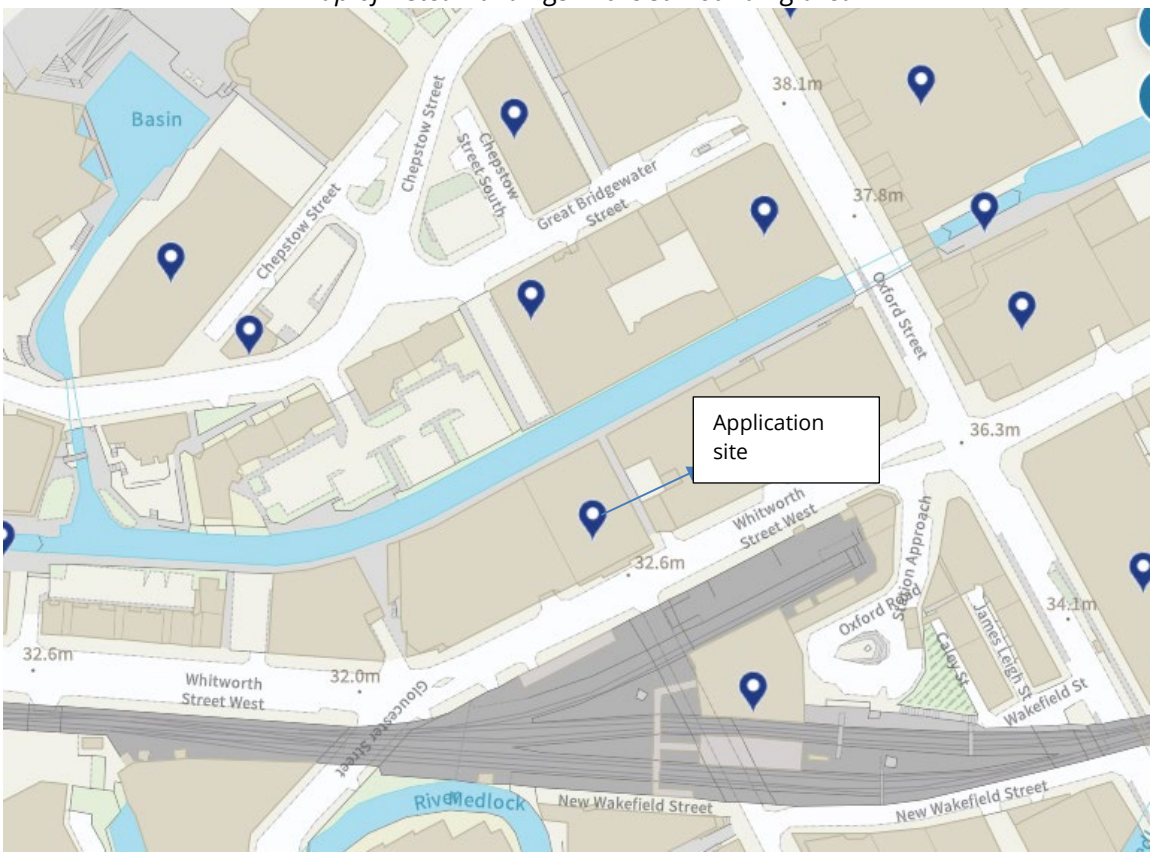
SJ8397 WHITWORTH STREET WEST 698-1/31/442 (North side) The Ritz Dance Hall

II

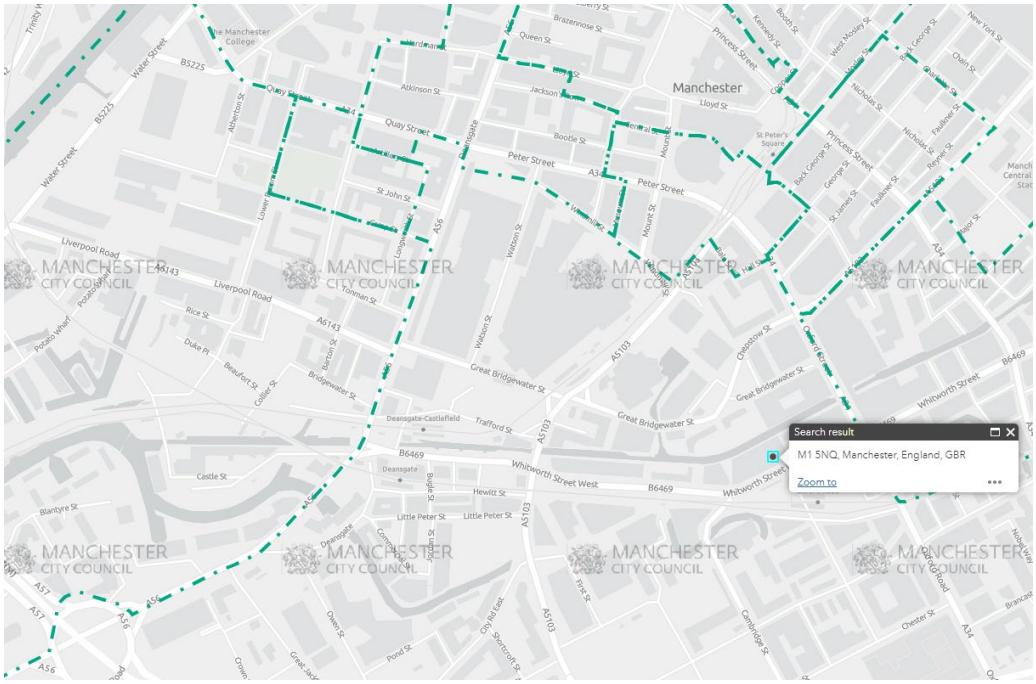
Dance hall. 1927, altered. Brick with white glazed terracotta facade, roof not visible. Rectangular plan at right-angles to street. Free C20 classical style. Two storeys, 1:7:1 bays, symmetrical; with plinth, channelled rustication to ground floor, horizontal canopy over ground floor suspended on tie-rods (and now with C20 fascia), pilastered upper floor, cornice and stepped parapet. The ground floor has a wide central entrance with a range of C20 doors, and 3 small windows to the outer bays (all either blocked or blind) with keystones and voussoirs; the upper floor has a pilastraded 7-bay panel with moulded surround including roundels, vertical-rectangular windows with moulded cornices in the 5 central bays with moulded ornament above them, and blind windows in the 1st and 7th; the end bays have paired windows in sunk panels, with similar cornices. Interior: original features such as balcony with Tuscan columns, pilastered walls, revolving stage (no longer functional) flanked by staircases (altered). History: venue of most of the well-known dance-bands of the 1930s and 40s. Included as now rare example of its type and date, representing earlier C20 popular culture.

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Map of Listed Buildings in the surrounding area



The Host building is not located within a conservation area but there are conservation areas in proximity as detailed on the map below:



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Whilst the application site is situated in proximity to conservation areas the scheme will not impact views into and out of the conservation area as, the proposed equipment will be positioned internally and the only external element is the GPS which is below the parapet and is screened from view. Consequently, the application is capable of protecting the character and setting of this designation as there is little demonstrable impact caused as a result. This is of notable significance as the application is not considered to have a detrimental impact on the surrounding conservation area and the public benefits the proposal will outweigh the negligible visual harm to the host building.

1.2. **Pre-Application Consultation**

Pre-application consultation letters were issued on 14th October 2024 to Deansgate ward councillors Joan Davies, Marcus Johns, Anthony McCaul and Lucy Powell MP. To date no responses have been received.

A site visit was undertaken on 13th November with Jack Naven Planning Officer and Jackie Whelan conservation officer, where the scheme was discussed, we looked at each individual location and there were a couple of locations where we were asked to move the antenna so that they were grouped with existing signage and equipment, this has been done.

Originally 20 antennas were proposed 2 in each location, however we have now changed the type of antenna being deployed and we only require 10 antennas, 1 in each location. We were also asked if the antennas could be painted black, the antennas themselves can not be painted but the ICNIRP cover can be black and can be placed over the unit. As per the details on page 29 of the accompanying document.

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2. Design

2.1. The Proposal

The proposal concerns the Ritz located on Whitworth Street West, Manchester M1 5NG. The application proposes 10 no. small cell dot antennas to be positioned within the building and 1 No. GPS node on the roof of the building below parapet level.

The GPS is the only external element and has to be external as the GPS has to be positioned to see the sky and to receive satellite information. The GPS is very small in scale approximately the size of a tennis ball and will not be visible from ground level.

As the works are for alterations to a listed building the scheme falls within Planning (Listed Buildings and Conservation Areas) Act 1990

The following section will assess the design considerations of this proposal in further detail though it is considered that the works are sympathetic to the listed building.

2.2. Design Considerations

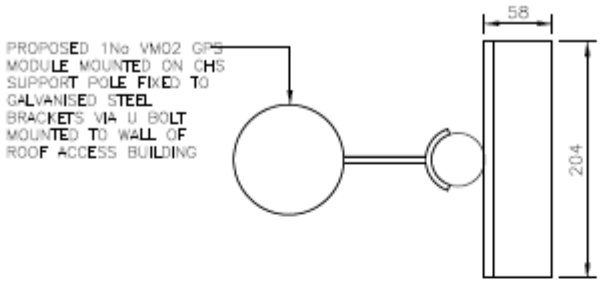
The proposal does not impact on the exterior of the listed building as all the antennas are located internally within the building with the exception of the GPS node which has to be able to see satellites. The GPS however has been carefully positioned on the roof and will be below the parapet and will not be visible from ground level.

Below is the location of the GPS

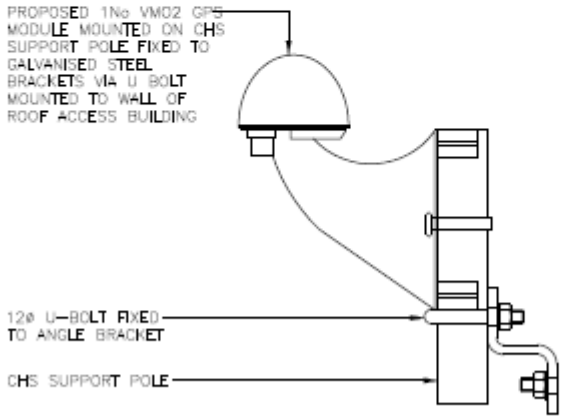


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The GPS is small in scale as detailed on drawing 400 A.



PLAN ON VMO2 GPS MOUNTING
(1:5)



ELEVATION ON VMO2 GPS MOUNTING
(1:5)

The 10 internal antennas have been positioned to ensure that there is adequate coverage within the building, existing coverage is as a result of the macro cells outside of the building within the general area which provide in building coverage but additional coverage is required within the building to provide coverage especially when the building is being used at capacity when there is an event on.

Each location has been selected based on the propagation levels which are included within the drawing pack and assessing where the levels are not adequate, the exact location of the antenna is then determined to ensure that no architectural features are being affected by the installation.

The 10 locations which have been selected are detailed on drawings 91034_NET_VMO2_DDR_34 , 91034_NET_VMO2_DDR_35 The operator's general practice will always endeavour to propose the least impactful design possible to sufficiently achieve the desired coverage levels. The cables will be hidden as far as possible by being laid inside cable containment where available. The cables are to be clipped to the ceiling above the false ceiling for locations where there is no containment and will be painted to match the background colour. The Antennas will be covered by a black ICNIRP cover as requested by the LPA and any redundant equipment will be removed.

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The dot antennas are small in scale and circular measuring 251 mm by 30 mm deep.

Though it is recognised that a telecommunications site will to a degree be recognisable in any given environment, the visibility of equipment does not automatically lead to detrimental harm as each site must be assessed on its own merits and balanced against the public benefits to be provided in accordance with national planning policy. In this respect significant weight should be given to improving existing 4G coverage and introducing 5G technologies in recognition of the government's commitment to this rollout and to ensure safety in venues such as this where currently the existing macro cells in the area can not provide the required coverage and an internal bespoke scheme is required to ensure that there is adequate coverage which can met demands when there is a capacity crowd at the venue. Digital connectivity is an essential utility provider in today's society and a high-quality service must be provided by the operators in accordance with license obligations.

Siting and Appearance

The antennas have been carefully positioned to ensure that they are grouped with existing signs and to ensure that they do not impact on architectural features within the building. Each location is identified in drawings 91034_NET_VMO2_DDR_34 , 91034_NET_VMO2_DDR_35 .

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3. Planning Policy Considerations

Development Plan Policy Section 70 of the Town and Country Planning Act 1990 as amended requires planning applications and appeals to be determined having regard to the provisions of the Development Plan and other material considerations, and section 38 of the Planning and Compulsory Purchase Act 2004 requires applications and appeals to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

3.1. Local Planning Policy

The following local planning policies are relative and have been considered in the submission of this application. It is argued that the proposal is in accordance with the below policies which promote high-quality connectivity and supports new telecommunications infrastructure when it can be demonstrated that the design and siting of the base station is respectful to its surroundings.

Manchester's Local Development Framework - Core Strategy Development Plan Document (Adopted 11th July 2012)

Policy SP1 Spatial Principles
In accordance with the Council's spatial principles, the proposed development will have a positive impact on the social and economic development of the area it will improve digital communication for a business and will give capacity back to the existing macro cells which will improve digital connectivity for the local area. The Council is focussed on supporting development that contribute to developing high quality places in which the demanding need for high speed mobile coverage is an important utility in this respect.

Policy EN1 Design Principles and Strategic Character Areas
The proposed development is in line with the seven principles of urban design as identified in national planning guidance, as discussed the equipment is located internally within the building and the only external element is the GPS node which is below parapet level and will not have any visual impact on the area. It is acknowledged that the building is listed but the locations that have been selected are not architectural features within the building.

Policy EN3 Heritage
In relation to heritage assets the applicant recognises the importance of protecting such assets to enhance the character and setting of the surrounding area and it is acknowledged that the host building is listed and all works are considered to be sympathetic to the building and its listing. The antennas are small in scale and positioned in locations that are not of high architectural quality. The proposal will provide bespoke coverage for the building itself and will relieve the amount of traffic to the existing macro cells which will negate the need for additional masts in the locality which could have a greater impact on the listed building and the area more generally. In this respect the proposed works subject to this application demonstrates little impact on the host building and surrounding area and therefore accords with the principle of this planning policy.

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The Greater Manchester Digital Blueprint (April 2020)
In addition to these documents, *The Greater Manchester Digital Blueprint* (April 2020) is also relative to this application as this document sets out the Council's ambition to be a world-leading digital city region. Through the investment of digital infrastructure, connectivity and transport, the City will be able to offer a breadth of creative services, ecommerce, technology hardware and software. The Council aims to create *"a digital place where innovators from across the globe want to tap into and a place where businesses already here can thrive."* In support of these objectives, the application herein will positively contribute to developing the digital framework of Manchester as a City that enhances the connectivity for current and future businesses as well as local residents and visitors.

It is therefore considered that the proposal complies with Local Plan policy.

3.2. National Planning Policy

The National Planning Policy Framework was revised in July 2021. In relation to this policy the following sections are relevant in determining this application:

Section 2 – Achieving Sustainable Development
Paragraph 7 – *"The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs."*

The NPPF also encourages the achievement of sustainable development which can provide public benefits to building stronger and more competitive economic areas, as well as enhancing social communities through increased communication and connectivity. These benefits feed into the overarching economic and social objectives of the NPPF.

Section 4 – Decision-Making
Paragraph 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 brownfield registers and 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."*

Section 6 – Building a strong, competitive economy
Paragraph 81 – *"Significant weight should be placed on the need to support economic growth and productivity… This is particularly important where Britain can be a global leader in driving innovation."*

Section 10 – Supporting high quality communications
Paragraph 114 – *"Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections."*

In relation to these paragraphs, the Government's Industrial Strategy sets out a vision to drive productivity improvements across the UK and sets out a delivery programme to make the UK a

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leader in *"artificial intelligence and big data"*. The improvement of telecommunications capacity and provision of 5G is imperative to allow for areas to be connected and is essential for economic growth which is expected to be delivered and upgraded over time.

Paragraph 115 – *"The number of radio and electronic communications masts, and the sites for such installation, 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."*

In relation to this paragraph, it has demonstrated in section 1.4 that a sequential approach to site selection has been adopted to ensure that existing telecommunications installations have been explored in the first instance to prevent unnecessary proliferation of masts. In this particular case there were no existing structures which could be upgraded and this proposal is to provide bespoke coverage which will relieve the pressure on existing sites and negate the need for an additional macro cell in the area.

Paragraph 116 – *"Local planning authorities should not impose a ban on new electronic communications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of electronic communications development, or insist on minimum distances between new electronic communications development and existing development. 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) They have considered the possibility of the construction of new buildings or other structure interfering with broadcast and electronic communications services."

Paragraph 117 – *"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, a statement that self-certifies that the cumulative exposure, when operational, will not exceed International Commission guidelines on non-ionising radiation protection; or
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."

In relation to this paragraph, the proposal is all internal and is a small cell and therefore does not affect an aerodrome or safeguarding area. The local ward councillors and the LPA were consulted

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and a site visit was undertaken. An ICNIRP certificate is provided with this application to confirm that the proposal will not exceed International Commission guidelines.

Paragraph 118 - *"Local planning authorities must determine 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."*

Section 12 – Achieving well-designed places
Paragraph 126 – *"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."*

Section 16 – Conserving and enhancing the historic environment
Paragraph 194 – *"In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary."*

Paragraph 201 – *"Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss…"*

Paragraph 202 – *"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."*

It is considered that the proposal is in accordance with these paragraphs as the application has been designed sensitively to be respectful of the identified heritage asset. Considerable efforts have been made to ensure the least amount of potential impact is imposed when balanced against technical constraints and the advancement of digital connectivity carries significant weight when considering the public benefits to be provided. Mobile operators are obligated to provide high quality connectivity across the country as a licensed utility provider in which sensitive heritage assets and land designations are often unavoidable circumstances to ensure high quality coverage can be provided to all areas of the country.

In relation to this paragraph the proposal is well designed and will not be visible in the surrounding area.

3.3. Code of Best Practice for Wireless Network Development in England 2022

The Code of Best Practice is a guidance document created by the Department for Digital, Culture, Media and Sport, which aims to support the government's objective of delivering high quality wireless infrastructure whilst balancing the needs of environmental considerations. This

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document has been developed in collaboration with mobile network representatives, other government departments, public bodies, local planning authorities and protected landscapes. It is also a useful tool for other interested stakeholders such as community groups, amenity bodies and individuals with an interest in mobile connectivity.

The guidance aligns the agreed principles between operators and local planning authorities in respect to the siting and design of network infrastructure to outline the roles and responsibilities of both parties throughout the application process. Within this document it is recognised that digital connectivity is vital to enable people to stay connected and businesses to grow, and there is particular emphasis on the 5G rollout and future mobile generations, which will be vital for a range of uses and future smart city applications. Much of the principles in this guidance reflect those already highlighted in the NPPF however, there are notable excerpts to highlight for the council's considerations in the determination of this application.

With reference to Paragraph 19, the local planning authority is *"encouraged to support the deployment of digital infrastructure by:*

- *Incentivising connectivity: support the expansion of telecommunications networks, and take a 'joined-up' approach to the wireless infrastructure planning process, including ensuring that Local Plans effectively support the deployment of digital infrastructure.*
- *Facilitating sites: engage with operators when new sites have been proposed and discuss site requirements.*
- *Engagement with operators: respond positively to requests for engagement and make decisions in line with national policy and Local Plans. For planning applications, find solutions to issues and ensure timely decisions are made.*
- *Information and communication: ensure that members of the public can access information about any development proposals within their local area. Send communications promptly to an appropriate operator contact (or their representatives)."*

When considering the siting and design of any given proposal, Paragraph 22 states, *"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."*

Moreover, Paragraph 29 states, *"There are factors that can affect the type of infrastructure that will be deployed… including location and the coverage and capacity requirements. Planning authorities should be aware of these constraints when considering proposals. In particular:*

- *In urban areas, where there is a high level of demand for mobile data, mobile base stations are likely to need to be deployed more densely. In these settings you can expect to see more use of streetwork monopoles and rooftop installations and, in future, we are likely to see a larger number of smaller units (so-called "small cells") deployed on buildings and on street furniture.*
- *In rural areas, base stations often need to cover wider geographic areas. Operators may need to use tall masts or lattice towers to provide the required coverage. The location of masts can sometimes be dictated by access to transmission links back to the operator's main network and proximity to a power supply. Coverage in some areas can be limited because of the geography, topography and terrain."*

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The guidance also provides further explanations for technical and operational considerations as below:

Paragraph 64 – *"All wireless network installations are principally guided by the technical need for the site and the technical constraints placed upon transmitting a signal. The siting and design of such installations must therefore be balanced between visual impact and these needs and constraints. As set out in the siting and design section above, the three primary technical and operational considerations for installation sites are: ensuring that wireless infrastructure provides an appropriate level of coverage over the intended geographical area; ensuring that sites have sufficient capacity to meet user demand; and, requiring a connection to the wider network 'backhaul'."*

Paragraph 65 – *"Planning authorities should take account of these constraints, and those set out below, on network deployment and siting and design, when considering proposals."*

3.4. Other Notable Reports and Reviews

The following reports highlight the importance of 5G technology. The recent pandemic has also shown an increased reliance on connected services due to the need for home-working and home-schooling, which is likely to continue in the post-pandemic era to an extent. It is therefore essential for mobile network operators to provide a reliable and resilient service to facilitate these needs, as evidenced in their significant contributions in the global response to the pandemic. Staying connected has become a defining feature of the modern economy and a significant trend of the 21st Century. Therefore, 5G will prove fundamental to fulfilling the potential of digital connectivity and will help drive the economy after the COVID-19 outbreak. For example, within the healthcare sector, hospitals and medical experts will have the ability to connect in real-time with their patients to diagnose and treat disease at the first point of contact to improve patient care. In terms of commercial benefits, manufacturers will look to leverage robotics, artificial intelligence (AI) and superfast connectivity to enable the remote management of production lines and to support the faster reconfiguration of factories.

Online Nation 2023 Report.

The report looks at the current online landscape of the UK. From 2020 to 2023 there has been an increase in the number of households which have access to the internet from 89% to 92% and the usage at home has gone from 87% to 90% in 2023. Approximately three quarters of time spent online by adults was on smart phones which illustrates that they are intrinsic to our lives.

This therefore illustrates the importance of mobile connectivity in this area.

Connected Nations 2023

The highlights from this report are:

- 4G mobile network coverage is broadly available. Coverage for data services from at least one operator reaches 98% of England's landmass and 4G continues to carry the majority of mobile data traffic (accounting for 81% of total data traffic in the UK).

- The availability of 5G services is growing rapidly. In England, the percentage of premises that can now receive 5G outdoor coverage from at least one operator ranges from 87% at

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the Very High Confidence level to 94% at the High Confidence level.1 This constitutes 17 and 13 percentage point increases respectively, demonstrating the pace of rollout over the last year.

This proposal will provide coverage in an area which currently has very poor coverage.

Government Joint Statements from DCMS and MHCLG
The Government is highly aware that 5G is vitally important for the United Kingdom. To enable this to happen the permitted development rights [in England] were reviewed to enable faster 5G rollout (NB: a legislation amendment came into force on 4th April 2022). Permitted development rights for electronic communications infrastructure are a critical element in the planning regime for streamlined and cost-effective deployment of telecommunications infrastructure. They benefit both mobile network operators and local planning authorities in the effective management of limited time and resources. Permitted development rights also facilitate investment in network infrastructure resulting in improved service to customers and help in delivering significant socioeconomic benefits to society both nationally and locally**.** Reforms to planning laws will mean fewer phone masts will be needed overall to level up the country with improved 4G and 5G mobile coverage as telecoms firms will be able to upgrade existing infrastructure in the first instance before needing to build new masts.

Digital Infrastructure Minister Julia Lopez said, *"We've all felt the frustration of having the 'no bar blues' when struggling to get a phone signal, so we're changing the law to wipe out mobile 'not spots' and dial up the roll out of next-generation 5G."*

This proposal is to provide 5G and is critical in the Government's long-term strategy.

Digital Nations Ministers
Chris Philp MP is tasked with meeting the Government's target for the whole of the UK to have access to gigabit–speed broadband connectivity by 2025 and majority 5G coverage by 2027. This proposal will aid in securing this target.

The Digital Nations Ministers met virtually on 18th November 2021 to discuss the digital government agenda. It stated, *"The global pandemic has proven beyond doubt that digital technologies play a crucial role in allowing our governments to meet the needs of our citizens whether in relation to delivering healthcare, social support, information, or education. We affirm our shared commitment to using digital technology to build back better. Acknowledging the continued impact of the COVID-19 pandemic on our societies, we discussed the opportunities digital innovation offers in tackling these, and other emerging challenges, including climate change, and exclusion and inequalities. As digital governments in open societies, we share a commitment to promoting inclusion, sustainability, and our shared values. We reaffirm our shared aim to work together to accelerate our digital transformation and become more proactive, responsive, and resilient digital governments. Working together, our governments will continue to use technology to break down barriers between government and people, and to embrace innovative digital solutions that deliver real-world impact."*

The statement looked at 3 key themes:

1. Sustainable Innovation – Technological advances, such as in the use of big data and artificial intelligence, offer ground-breaking opportunities for governments and the

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international community to tackle our most pressing challenges, including climate change. As sustainable digital governments, we affirm a shared commitment to making better use of data, digital tools, and technologies to reduce the environmental impacts of our government's own operations, and to strive to address the sustainability considerations of digital activities.

2. Inclusive Innovation – We remain committed to putting people at the centre of digital transformation. We will continue to deliver inclusive policies that narrow the digital divides: this includes widening access to the Internet and to digital tools and technologies, enhancing our digital infrastructure to reach underserved communities, building digital skills and digital confidence, and designing for accessibility. We recognise our responsibility to ensure no individual is left behind as we accelerate the digital transformation of our governments.

3. Values-Driven Innovation – We believe that public trust in the digital services and tools we develop and deploy are paramount to their successful adoption. As leading digital governments in open societies, we recognise that accelerating digital transformation must therefore be guided by our shared values. We affirm our shared commitment to putting in place the right safeguards, including for human rights, data protection, data ethics, and to promoting transparency and public confidence in public sector use of data and digital technologies.

This clearly shows that digital connectivity is high on the Government agenda and this proposal aids in providing the UK with high-quality connectivity.

Councils and Connectivity 2 – A report by Building Mobile Britain and Mobile UK, May 2019
"Mobile operators have ambitious plans to further enhance their networks and will soon be starting initial commercial rollout of 5G, the next generation in mobile technology. This ambition matches the Government's objective for the UK being a world leading digitally connected economy. However, mobile operators cannot achieve this objective alone – action is needed by all stakeholders, including national and local government. It is vitally important that residents and businesses can access 5G in the future. It promises to radically transform our economy and society for the better…it is vital that councils attempt to understand why good quality mobile connectivity will become more important, and what they need to do to ensure that local residents and businesses have access to the best possible mobile connectivity in the future."

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.

5G will enable exciting new services and applications including:

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- *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, o other road users and even the road infrastructure."*

Statement of Strategic Priorities for Telecommunications, The Management of Radio Spectrum, and Postal Services – updated version published by DCMS October 2019
"The Government is committed to providing the UK with world-class digital connectivity that is gigabit-capable, reliable, secure and widely available across the UK. We want the nationwide deployment of gigabit-capable broadband networks at pace. Alongside improving 4G coverage to meet existing mobile demand, the Government wants the UK to be a world leader in 5G, and for the majority of the population to have 5G coverage by 2027. 5G is expected to deliver faster and better mobile broadband services to customers and businesses, and to enable new services for industry sectors, including manufacturing, logistics and immersive technologies. 5G creates an opportunity for market expansion - in the type of wireless services available and in the number of providers of networks and services. The Government's view is that there would be strategic advantages in a model that maintains the benefits of network competition between multiple mobile network operators, while enabling new solutions to connectivity challenges, including in-building coverage, rural coverage and industrial applications."

The above statement highlights the importance of rolling out a 5G network and this application will provide bespoke coverage to a venue which attracts a high volume of users. By installing small cells within the building the usage on the existing macro cells is reduced and ensures that the existing sites can cope with the demand from the local area and train station, whilst also ensuring that the venue has good mobile connectivity in the event of an emergency.

In summary, it is our opinion that the proposal meets all local and national policy requirements.

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4. Technical Justification

In the assessment of this application, material weight should be given to the public benefits that will be provided to local residents and visitors in this area. The site will form part of an improved coverage network which will also introduce 5G technology to allow for faster download speeds and better signal. More information on 5G can be found in the accompanying documents: 5G and Future Technology, Connected Growth Manual Digital Infrastructure and The Institution of Engineering and Technology's Guide for Local Planning Authorities Regarding 5G Masts and Small Cells.

The consequences of the global pandemic have also highlighted the inadequate nature of infrastructure in suburban and rural areas in particular as a result of increased home-working and e-learning for school. Existing base stations have struggled to handle increased data traffic demands which demonstrates the importance of improving digital connectivity in all parts of the country. In addition to improving signal strength, speed and capacity for current demands the proposed works will also aid in futureproofing the quality of the network through its greater robustness. As a licensed code operator, the applicant has a legal obligation to ensure a high-quality service is accessible to the public throughout the UK as it contributes positively towards the socioeconomic development at local and national levels. This is particularly apparent in densely populated areas that experience high levels of footfall on a daily basis.

The demand and focus on delivering the 5th generation of mobile phone technology is the primary objective of licensed operators in the UK as part of the national rollout. In today's climate the existing 4G network has allowed users to video stream at much faster data speeds allowing the integration of smart phones into wider uses than previous generations. The inevitable consequence of technological advancements means that customers expect tasks to become even quicker and simpler.

To quote the 5G and Future Technology document, *"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 Government that we must ensure that we have the infrastructure in place to deliver 5G across our major centres and transport networks."*

The introduction of 5G technology will improve the country's digital connectivity and appeal to visitors and businesses alike through the creation of smarter technology which will benefit the British economy.

"Examples of this new world that will emerge from ubiquitous 5G coverage involves such things as connected and autonomous vehicles, traffic management, smart manufacturing with heterogenous autonomous machines, direct machine to machine communication, advanced medical devices, automated agriculture, far greater security provision, more stable and reliable connectivity and advances in further application development with uses not yet identified. All of the above provides an insight into the future development of connectivity in our modern world and also provides a further insight into the expected minimum eight-fold increase in data usage by each mobile operator over the next 5-6 years."

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The national government recognises the importance of the 5G rollout which is a stance taken by government minister Margot James, the NPPF and The National Infrastructure Commission.

"5G has the potential to dramatically transform the way we go about our daily lives, and we want the citizens of the UK to be amongst the first to experience all the opportunities and benefits this new technology will bring…." – Margot James, the government minister for digital).

"Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections." – NPPF (July 2018)

"Getting 5G deployment right will be critical in a future where connectivity is becoming integral to almost all parts of the economy, and the UK will put its future growth and competitiveness at risk it if falls behind." – 'Connected Future' National Infrastructure Commission 2016

Although Central Government understands that this may present concerns with the various design solutions proposed, it is important that all Local Planning Authorities understand the technical needs of 5G and better understands the wider advantages of such new technology. The government have also expressed support for new telecoms installations and the deployment of new technology. It is seen as essential for the country to develop and exploit the advantages of such new technology to the direct benefit of the public and the economy.

4.1. Coverage

The licence granted to VMO2 demands that strict coverage qualities are met nationwide. It is essential that the benefits of mobile phones are available across the population. Mobile networks are constantly reviewed to ensure that there is adequate coverage and capacity to meet customer demands. In the current environment there is an expectation for signal coverage to be available at home, in the workplace, while shopping, enjoying leisure activities or in transit. This proposal will provide bespoke coverage to a host building but it will result relieving the pressure on the existing network, which has capacity issues at times of high usage.

4.2. Quality

In order to ensure there is sufficient coverage within buildings such as homes, shops, offices etc. the radio signal has to be of adequate strength to penetrate walls. In urban and suburban areas a dense network of base stations is therefore required, which are sometimes less than 1 km apart. The improvement of 3G and 4G signal and introduction of 5G in this area will encourage economic advancement in accordance with national policy which seeks to develop and grow connected environments.

4.3. Capacity

This proposal will improve the capacity of the surrounding network and will ensure that there is enough capacity for the venue when there is an event on.

4.4. Health and Safety

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The proposal for this site has been designed within International Commission on Non-Ionising Radiation Protection (ICNIRP) public exposure guidelines and therefore Health and Safety concerns should not be a planning consideration. An ICNIRP certificate is submitted with this application.

In addition to this, The Institution of Engineering and Technology's Guide for Local Planning Authorities regarding 5G Masts and Small Cells, provides a brief overview of 5G technology and the health issues that are often misunderstood. It concludes by saying, *"Small 5G base stations in our towns and cities will allow improved network coverage. They will reduce radio wave exposure to individual smartphone users and improve local 5G capacity for all manner of useful bandwidth-hungry applications. And a good 5G fibre base local broadband infrastructure will be important to local communities over the coming decades in view of the ever-increasing amounts of data being consumed by the general public."*

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5. Conclusion

A requirement for improved coverage for this venue has been identified as the existing network is not sufficient to provide in building coverage. This new site will provide essential services for the venue and ensure that there is good digital connectivity when the venue is at capacity. This will ensure that in an emergency the network can be utilised.

The proposed works have been designed sensitively in consideration for the character and appearance of the surrounding area and the host listed building in which the least impactful scheme has been proposed to minimise the visual impact of the proposal whilst also ensuring the coverage objectives can still be achieved. A reduction in the number of small cells would therefore substantially impact the quality of signal provided and the overall functionality of the site.

The applicant considers the proposal to be an acceptable development which should be viewed favourably by the local planning authority.

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