SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Saint Clare SW	Site Address:	VICTORIA AVENUE, BOOTHROYDEN, MANCHESTER, M9 OLR
National Grid Reference:	E: 385362 N: 404180		
Site Ref Number:	CS30814300 VF23647_0	Site Type:[1]	STREETWORKS MACRO

2. Pre Application Check List

Site Selection (for New Sites only)

(Would not generally apply to upgrades/alterations to existing site including redevelopment or replacement of an existing site to facilitate an upgrade or sharing with another operator)

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	**No**
If no explain why: It was felt that the industry database was a more up-to-date source of information.		
Were industry site databases checked for suitable sites by the operator:	**Yes**	No
If no explain why: N/A		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	No
Date of pre-application contact:	N/A
Name of contact:	N/A
Summary of outcome/Main issues raised: A pre-application consultation letter, consultation plan and drawings were sent to the Local Planning Authority by email on 08/10/2024. No response was received.	

Annual area wide information to planning authority

Has annual area wide information been provided?	No
If no explain why:	

[1] Macro or Micro

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Summary issues raised: Cornerstones commercial relationship with Vodafone 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 Vodafone 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:	Red	Amber	**Green**
Outline of consultation carried out: Pre-application consultation letters and drawings of the proposal were sent to the LPA, Ward Councillors, St Clare's RC Primary School and Tiddlywinks Nursery Higher Blackley on the 8th of October 2024.			
Summary of outcome/main issues raised (include copies of relevant correspondence): This provides an opportunity for local stakeholders to discuss development proposals and identify site-specific issues. Cllr Julie Connelly visited the site and reported back that the location looks reasonable.			

School/College

Location of site in relation to school/college (include name of school/college): Tiddlywinks Nursery Higher Blackley and St Clare's RC Primary School sits within 200m of the proposed application site.
Outline of consultation carried out with school/college (include evidence of consultation): A consultation pack was sent on the 8th October 2024.
Summary of outcome/main issues raised (include copies of main correspondence):

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An email was received from St Clare's RC Primary School regarding highway safety/visibility splays and that it would appear to be a prominent location in front of the Church.

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?	Yes	**No**
Has the Civil Aviation Authority/Secretary of State for Defence/operator of the civil safeguarding area or defence safeguarding area been notified?	Yes	**No**
Details of response: N/A – Manchester Barton Aerodrome is approximately 12km away.		

Developer's Notice

Copy of Developer's Notice enclosed?	**Yes**	No
Date served:	23.10.24	

Proposed Development

The proposed site:
Government is committed to supporting investment in high-quality, reliable digital connectivity so that communities can benefit from faster economic growth and greater social inclusion. It is essential to keep pace with growing demand for internet bandwidth and mobile data from local businesses, residents and those who visit our communities. As part of Vodafone's continued network improvement program, there is a specific requirement for additional coverage at this location to overcome capacity issues as the existing base stations are struggling to serve the target area. It will also ensure that this part of Manchester will have access to the most up-to-date technology with the introduction of 5G coverage. This ensures that coverage and capacity requirements are maintained and enhanced in line with the operator's license. WHP Telecoms have been commissioned to act on behalf of Cornerstone for the proposal in front of you. The specific proposal to provide the most up-to-date technology comprises the erection of 1no. 20.0m monopole, 6no antennae, 1no. 0.3m dish, 3no. cabinets and 1no. meter cabinet, 7no. paving slabs and ancillary development. The technical details of this proposal are illustrated within the enclosed application design drawings: - (CS30814300_VF23647_0_VMO2_NA_GA_REV_A Planning Drawings). The search process involved an initial 'desk-top' survey to ascertain and identify major constraints and impediments, followed by a physical search of the area. It is important for the reader to acknowledge that demand for network coverage is **always** most prevalent within dense residential areas, especially following the shift in working patterns from urban centres to suburban areas.

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It is recognised that the very nature of installing new 5G communications infrastructure within a dense residential area requires a well-measured balance between the need to extend practical coverage with the risk of increasing visual intrusion. This proposal has been strategically placed by radio planners in conjunction with a team of multi-skilled professionals, in an area that is expected to have the least overall impact in terms of dominance and 'harmful' short-fixed views but unfortunately, a level of visibility is always inevitable.



Figure 1: Aerial View of the Proposed Application Site in the context of the surrounding area

As captured within Figure 1, the general area is densely populated with residential land uses, mainly dominating the entire cell search area. However, there is a noticeable break at the proposed application site whereby the site plots widen slightly, and more commercial/ecclesiastical and educational land uses are present. St. Clare's R.C. Church sits directly to the North, with St Clares R C Primary School and Tiddlywinks Out of School Club following. To the South, there are five hot-food takeaway services, three beauty companies, a dessert bar, solicitor, and letting agent. Many of which have wooden boards/advertisement displays covering the windows on the upper floor, suggesting to the Applicant that these are not residentially occupied. Ultimately, the presence of these commercial properties reduces the volume of harmful residential views.

The Applicant does not anticipate that a large volume of direct and front facing views will be activated due to the specific siting and design measures the Applicant has implemented, but nonetheless, it is important to fully assess the scenario. The closest residential property is 188 Victoria Avenue with a reasonable separation distance of 33m. The trees, immediately to the East of the proposal and along the boundary of the property would intervene between such views, having the potential to screen part of the pole and the ground-based equipment, ultimately reducing the visual scale of works. The Applicant also recognised that the gable wall fronting onto the development does

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not have windows on the upper level, ultimately disabling direct and front facing views. The window on the lower level appears to be from a garage and not necessarily a principal bedroom or living room. Regardless, the high fence and dense shrubbery is believed to screen views. The same principles, [i.e. windowless walls and ideal orientations] are thought to apply to other nearby dwellings, specifically 182 Victoria Avenue and the new build development to the Southwest. When these siting and design measures are coupled with the monopole's slimline design, it provides the Applicant, and hopefully the reader, with the reassurance that serious overshadowing or loss of daylight should not be an issue here.

Victoria Avenue is a primary, arterial route (A6104) running almost parallel to the South of the M60, allowing traffic to flow within Manchester along a North – Northeastern corridor. The street scene measures almost 29m wide and so, the vast scale was admirable for having the ability to comfortably host higher levels of street furniture without causing an adverse impact on the street scene. It was considered most appropriate to confine the search along this route, as a means of protecting the more intimate character associated with those smaller side streets servicing residential properties. The transient nature of views is thought to be less impactful than those fixed, residential views, especially considering the intermittent nature from rich tree cover.

The site selection process was influenced by the presence of similar vertical street furniture within close proximity to the site. Street lighting columns line both sides of Victoria Avenue with sporadic but mature trees. There is also an additional reoccurrence of telegraph poles, their subsequent overhead lines, road signage, speed camera poles, shipping containers, bus shelters, traffic lights, vertical fencing, bollards, and existing cabinets plotted across the street scene. When the proposal is viewed in conjunction with these similar structures, it is believed to create an environment where the proposal can easier assimilate with and integrate somewhat seamlessly into the street scene.



Figure 2: Streetview of the proposed application site along Victoria Avenue facing Northeast

From Figure 2, the proposal is thought to sit strategically behind a large tree canopy whereby a large percentage of the proposal can be screened behind. From the alternative perspective, this provides a level of back clothing. Even within the seasonal months, the thick trunk girth and dense branch network is thought to offer assimilation and a visual distraction that would help camouflage the proposal. This siting measure is believed to soften visual change, and when this is coupled with the

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previously mentioned scale of the road, it is believed to comfortably host this level of change without creating an adverse impact.



Figure 3: Streetview of the proposed application site along Victoria Avenue facing West

Views from Figure 3 benefit from a natural meander that favourably reduces the visibility of the scheme to a very short range [120m]. When travelling at speeds of 30mph, in theory, the proposal would be visible to the driver for 9 seconds. This is further complicated by the mini roundabout which requires the driver's full attention to navigate. Similar characteristics are present here, including the presence of mature trees, vertical lines and wide road scales.

The proposal will also be viewed in the same context as the existing 3UK streetworks pole. The Applicant would like to draw the readers attention to the Officer's Report for 127041/TEL/2020 by referring to the following extracts;

> *'It is considered that the proposed equipment has been sited to minimise its impact on visual amenity. There is an abundance of street furniture located on Victoria Avenue including lampposts and traffic signage, however, there is nothing comparable to scale of the proposed 20 metre mono pole. Whilst it is recognised that the proposed monopole would be visible above the single storey commercial property due to its scale, the proposed location is on a major arterial route and has a commercial backdrop, therefore, it is not considered that the proposed installation would give rise to any significant impacts on the street scene of this stretch of Victoria Avenue.'*
>
> *'The nearest residential properties are to the south on Heathbank Road are approximately 40 metres away and to the north on Victoria Avenue approximately 35 metres away from the proposal site. The installation would be visible from these properties, particularly those on Victoria avenue, however, given, the distance of the nearest properties, it is not considered that the proposed installation would give rise to any significant impacts on the residential amenity of the occupiers of these properties.'*

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'Moreover, the public benefits to provide 5G coverage to the surrounding area is considered to outweigh any harm to visual amenity in this instance.'

There are many transferable points here, but this application differs in the sense that it should appear less exposed, being sited amongst two-story properties and having the existing 20m pole to assimilate with. Unfortunately, the existing 3UK base station cannot be utilised due to the nature of 5G technology. The network services it provides, means the equipment and antennas are quite different to the previous, and existing, service requirements. One example is that the antennas are some 3 times as heavy as previous antennas, and so it presents structural concerns when the equipment of two Mobile Network Operators is present. Other factors include radio interference associated with a lack of separation between technologies and between Operators. Limited pole space is also an issue with the additional equipment required for 5G service. The cumulative impact of two similar poles is not considered to be overwhelming given the distances involved, lack of residential presence and the vast scale of the road.



Figure 4: Streetview of the proposed application site along Plant Hill Road facing North

From Plant Hill Road, views of the proposal will be lessened by the built and natural environment. It is offset to the left ensuring that direct and long-ranging views of the proposal are not activated. It should appear no more harmful that the existing telecommunications pole as only the antennas peer above the skyline, which in itself is an operational requirement, necessary to clear landscape features and propagate signal.

The Applicant has intentionally pushed the monopole to the East of the scheme with the lower lying cabinets to the West. This is intentional to maximise upon the separation distances between that and the closest residential property [188 Victoria Street], but also to minimise the need for pruning/root disruption.

The principle of telecommunication development at this location is acceptable (subject to appropriate siting and design measures) under the Town and Country Planning (General Permitted Development etc.) (England) (Amendment) (No. 2) Order 2023, which came into effect on 21st December 2023. The Applicant believes that the current application benefits from many natural screening measures and as a result is generally acceptable, especially considering the fact that Manchester City Council previously assessed the existing 3UK site as acceptable.

The Applicant has proposed that a galvanised pole is installed to assimilate with the existing streetlights, allowing it to blend in without creating too much visual change. This, however, is the Applicant's

opinion, and if the LPA considers an alternative colour option, the Applicant is open to discussing this further.

The location has also been chosen as it does not fall within any designated areas of conservation, or environmental or historic designations. The closest listing is more than 460m away which is believed to be a sufficient distance not to cause any adverse harm.

The proposal ensures that pedestrian movement is not impeded upon in accordance with Department for Transport (DfI) Manual for Streets (MfS) 2007. The development is set on a grass verge to reduce disturbance as far as practically possible. There remains a suitable passing distance for wheelchair and pram users, and the proposal is also sited away from tactile paving and crossing points.

The proposal's design is believed to be the most sensitive option that is respectful of the street scene. Upgrading the existing telecommunications site to a bulky and taller lattice tower was thought to be much more insensitive than what is currently proposed. For confirmation, the pole height is required for appropriate signal propagation, clearing any landscape features. 5G operates at higher frequencies where attenuation of the radio signal is naturally higher, and the effects of clutter are greater. Increased height ensures that the topography of the landscape does not have an unacceptable impact upon mobile signal quality. It also uses adaptive beamforming technologies, unlike previous generations and this increases capacity and data speeds to the user but requires a taller antenna height. It also ensures ICNIRP compliance whilst the pole width is required for structural reasons, wind loading, and to allow enough room to host the internal cables.

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

It is important that the reader appreciates that it is almost impossible to introduce new infrastructural elements to any environment without some degree of impact. Indeed, with communications infrastructure, it is virtually impossible to physically enhance the setting in which it is located and more often than not, all that can be done is seek to limit impact to an absolute minimum through sensitive siting and design practices, as has been the case.

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

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.

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Enclose map showing the cell centre and adjoining cells if appropriate:
A map can be provided upon request.

Type of Structure *(e.g. tower, mast, etc):*	
Description: Proposed installation of 20m monopole, 6no. antenna, 1no. 0.3m dish, 3no. cabinets, 1no. meter cabinet, 7no paving slabs and ancillary development thereto.	
Overall Height: 20m	
Height of existing building *(where applicable):*	N/A
Equipment Housing:	
Length:	See drawings enclosed
Width:	See drawings enclosed
Height:	See drawings enclosed
Materials *(as applicable):*	
Tower/mast etc – type of material and external colour:	Galvanised M-Range V2 Pole
Equipment housing – type of material and external colour:	Standard Finish coloured Light Grey [RAL7035]

Reasons for choice of design, making reference to pre-application responses:
As previously mentioned, the proposal is required due to acute capacity issues and will facilitate significantly improved 5G coverage in an area that has not gained this level of connectivity yet. The applicant would reiterate that the siting of any base station proposal is intrinsically linked to operational need, the availability of sites and the land uses present within the target area. The design of a base station is in turn dictated by function and the context of the nominated site. As form follows function, the very nature of 5G and the network services it provides, means the equipment and antennas are quite different to the previous, and existing, service requirements. The reader may see an increased need for taller structures, and this is because 5G operates at higher frequencies where attenuation of the radio signal is naturally higher, and the effects of clutter are greater. Increased height ensures that the topography of the landscape does not have an unacceptable impact upon mobile signal quality. It also uses adaptive beamforming technologies, unlike previous generations and this increases capacity and data speeds to the user but requires a taller antenna height. Remote Radio Units now need to be placed at the top of the pole, again, requiring more pole space. It is considered that the proposed height and therefore the associated visibility of the scheme does not outweigh the overall public benefit of the scheme.

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Site sharing is not a viable proposition for the following reasons. The existing streetworks pole cannot be utilised because 5G antennas are some 3 times as heavy as previous antennas, and so it presents structural concerns for this streetworks design. If this site was to be upgraded, it would require a bulky and much taller lattice tower design to satisfy the required separation distances between technologies and Operators to ensure no interference is caused. The monopole option was preferred as it presents a much slimer profile, and one that best assimilates with the existing street furniture, therefore minimising visual change as much as practically possible. A taller lattice tower would increase visual impact, being out of character for the area.

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 technical requirements of mobile communication operators 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. The Applicant has successfully explored and discounted their site sharing opportunities in accordance with the sequential approach outlined within the NPPF

The points argued thus far indicates that the proposal strikes 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 provide high-quality and high-speed communication infrastructure essential for economic growth to improve a critical service as illustrated by the NPPF and the Local Plan.

Health and Safety - including ICNIRP compliance

ICNIRP 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.

The proposed installation conforms to current government planning guidelines regarding potential health effects arising from telecommunications development and the operator has included an ICNIRP certificate within the application pack.

Recent court cases have confirmed that the public perception of health risks can be a material consideration within the land-use planning system. The publication of the National Planning Policy continues to highlight the Governments view that the planning system is not the appropriate mechanism for determining health safeguards. It sends a clear message to local planning authorities stating that they must 'determine applications on planning grounds. This is reiterated in the Code of Practice.

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Notably, Ofcom have now undertaken 5G audits in the major cities and the results indicate that the exposure levels are a small fraction of the limits. This further reinforces the PHE guidance in respect of 5G which states: "It is possible that there may be a small increase in overall exposure to radio waves when 5G is added to an existing network or in a new area. However, the overall exposure is expected to remain low relative to guidelines and, as such, there should be no consequences for public health." (https://www.gov.uk/government/publications/5g-technologies-radio-waves-and-health).

3. Technical Justification

Enclose predictive coverage plots if appropriate, e.g. to show coverage improvement. Proposals to improve capacity will not generally require coverage plots.

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

The National Planning Policy Framework clearly states that authorities should not question the need for the service, nor seek to prevent competition between operators. Notwithstanding this fact, the Applicant considers it to be important to explain the technical justification for the site and how the facility fits into the overall network.

The dynamic nature of technological advances in the telecommunications 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 including filling holes where there is currently a lack of service provision.

Cellular networks are made up of several individual cell areas, each of which has a base station within it. A good analogy for describing a cellular network is that of a patchwork quilt with each cell area being one of the many patches that are sewn together making up the network 'quilt'. Mobile phone base stations operate on a low power and accordingly base stations therefore need to be located in the areas they are required to serve. Increasingly, people are using their mobiles in their homes, whether it is for work or leisure, this means the operator often has to position base stations in, or close to, residential areas.

In the early days of mobile communications, peripheral locations, high-level topographies and large-scale towers were often identified in order that transmission from a new base station could cover an expansive geographical area. However, whilst this approach was viable for early network generations, the number of mobile handset users has dramatically increased with time, as have the advancements in mobile technology itself. As a result, the cellular network construction and operational criteria have changed too. Because modern networks use higher frequencies with faster data rates whilst serving significantly increased numbers of mobile device users, typical network cell areas are now smaller in their geographical expanse and tend to be directly proportionate to the number of users within it. This makes it incredibly difficult to site proposals where absolutely no impact is created, but nevertheless, the Applicant believes that this is a worthy option.

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4. Site Selection Process

Alternative sites considered and not chosen (not generally required for **upgrades/alterations to existing sites** including redevelopment of an existing site to facilitate an upgrade or sharing with another operator)



Figure 5: Aerial View of Discounted Options

Site Type	Address	NGR	Reason for not choosing site
D1	Existing Mast - Victoria Avenue, Boothroyden, Manchester, Greater Manchester, England, M9 0RE, United Kingdom	385473 , 404198	For reasons already outlined within the report, this structure cannot be utilised unless it is upgraded to a taller and wider lattice tower. In summary, this is due to the nature of 5G, the antenna design, and the separation required from other items of associated equipment. The lattice tower is thought to be much more visually harmful and out of character for the area.
D2	Cope Funeral Service, Victoria Avenue, Boothroyden, Manchester, Greater Manchester, England, M9 0RE	385496 , 404184	This building has a sloping roof and an insufficient building height which is incompatible with the build methodology whilst also being incapable of clearing the landscape features to provide adequate signal across the cell area.
D3	Victoria Avenue, Higher Blackley, Manchester, Greater	385183 , 404090	D3 has a flat roof which is favourable, but unfortunately the building height is also insufficient. It would require a large stub

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	Manchester, England, M9 0NL, United Kingdom		mast which was thought to be much more visually intrusive than what is currently proposed.
D4	Victoria Avenue, Boothroyden, Manchester, Greater Manchester, England, M9 0RS, United Kingdom	385553 , 404211	Again, D4 is of an insufficient building height, but in addition to this, the skylights would present as a feature that would require more ICNIRIP safety requirements, that in this specific case, cannot be satisfied. Its land use is commonly thought to be a more sensitive receptor and so it was discounted.
D5	Saint Clare, Victoria Avenue, Boothroyden, Manchester, Greater Manchester, England, M9 0RA, United Kingdom	385319 , 404215	D5 is favourably tucked away from the roadside, but as another rooftop option, it too, is of an insufficient building height and as an inevitable consequence, it would not be capable of providing the level of coverage required.
D6	Kingsmead Mews, Higher Blackley, Manchester, Greater Manchester, England, M9 0RT, United Kingdom	385083 , 404049	D6 is similar to D3, except the topography will have a much larger impact upon the proposal here. Elevations drop by approximately 10m and so it would require an even larger stub mast to cover the target area.
D7	Victoria Avenue, Boothroyden, Manchester, Greater Manchester, England, M9 0RE, United Kingdom	385498 , 404199	The pavement width here is admirable but unfortunately a site in this location would not provide sufficient separation between the proposed application site and the existing telecommunication mast. There is an operational requirement to ensure there is no interference between the two operators and so this site cannot be progressed.
D8	Victoria Avenue, Boothroyden, Manchester, Greater Manchester, England, M9 0LR, United Kingdom	385447 , 404188	D8 is similar to D7, having insufficient separation distances between the proposed application site and the existing telecommunication mast. There is also a heavy presence of underground services which limits the availability of space in which a mast can be sited and respectful of pedestrian movement.
D9	Victoria Avenue, Higher Blackley, Manchester, Greater Manchester, England, M9 0NL, United Kingdom	385205 , 404106	Excessive scarring on the pavement is incompatible with the build methodology as there will be an insufficient space to deploy the infrastructure. This location would also expose the proposal to much higher direct and front facing residential

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			views, which was deemed unacceptable.
D10	Victoria Avenue, Higher Blackley, Manchester, Greater Manchester, England, M9 0NL, United Kingdom	385266 , 404126	D10 is similar to D9 in the sense that the impact to residential amenity would be much higher here. The separation distances would be as low as 5m, therefore having the ability to become a prominent and overbearing feature.
D11	Longton Road, Boothroyden, Manchester, Greater Manchester, England, M9 6NE, United Kingdom	385315 , 404039	D11 sits on a grass verge within a small-scale residential park. The volume of views is thought to be much higher than what is currently proposed. It would also appear more exposed with less screening opportunities/vertical elements to assimilate with. The presence of overhead lines would also create a difficult and dangerous build and so it was discounted.
D12	Heathbank Road, Higher Blackley, Manchester, Greater Manchester, England, M9 6WH, United Kingdom	385463 , 404123	D12 hold similar characteristics as D11, being sited on a junction with higher separation distances, albeit still short – 10m. It would be susceptible to a much larger volume of residential views which is recognised as more harmful.
D13	Boothroyden Road, Boothroyden, Manchester, Greater Manchester, England, M9 0SL, United Kingdom	385420 , 404290	The road width is admirably larger on the Boothroyden Road than most other side streets. It is also similar to other discounted sites in the sense that overhead lines are present, residential views are higher, and there are underground services under the pavement.

If no alternative site options have been investigated, please explain why: N/A
Land use planning designations: N/A
Additional relevant information (include planning policy and material considerations): From the outset, it should be appreciated that irrespective of the proposed installation's use as a telecommunications apparatus, any change in form in the street scene will always be, to some degree, a noticeable alteration to those regular passers-by found closest. We have tried to best mitigate any direct changes in residential areas by locating the proposal along a streetlight lined road, outside of statutory designations and in an area where there is a break

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in the typically dense residential pattern. It should also be recognised that visibility or a development's siting and appearance, does not automatically result in an overwhelming adverse harm.

When considering the appropriateness of telecommunications development proposals, it is imperative that Decision Makers give precedence to telecommunications specific policy where it exists. If it does not exist at a local level, or if the policy is out of date, then the NPPF must prevail.

The following information outlines the various planning guidance and policy that has been considered relevant to the subject application. It is not necessary to quote extensively from this document, but the following points are highlighted.

National Planning Policy Framework

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

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

- *to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- *to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
- *to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.'*

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

The Government's latest thinking strongly supports communications infrastructure. Section 10 relates to 'Supporting high quality telecommunication'. Paragraph 118 of the framework document sets out the objectives of the communications Infrastructure. It states that 'advanced, high quality and reliable communications infrastructure is essential for economic

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growth and social well-being'. This is echoed by the Councils own Digital Communications objectives. Planning decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections.'

Paragraph 119 states 'The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate'.

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

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

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

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

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

The Code of Best Practice has been fully revised in 2022 and is now even more supportive of mobile network provision in line with Government aspirations that everyone should have access to the information no matter where they are located whether that be in rural or urban areas. This Code provides guidance to mobile network operators, their agents and

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contractors and equally to all local planning authorities in England. It supersedes the Code of Best Practice on Mobile Phone Network Development (2016).

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

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

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

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

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

It implies that consumers, businesses and public bodies are increasingly relying on mobile communications and expect to receive a signal wherever they are. The Code indicates that recent changes in planning policy [and regulation] are intended to align with Government

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communications policy, where the ultimate goal is to achieve mobile coverage wherever it is needed.

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

Local Policy

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that "where in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material consideration indicates otherwise".

Adopted Manchester Core Strategy (2012) / Manchester UDP (saved policies) / Places for Everyone Joint DPD (2024)

The Manchester Core Strategy was adopted on 11 July 2012 which is the key development plan document in the LDF. It replaces significant elements of the UDP, however, a number of policies remain extant following the adoption of the Core Strategy. It was updated in March 2024, after the Places for Everyone Joint Development Plan was adopted. These documents set out the long-term strategic policies for Manchester's future development and will form the framework that planning applications will be assessed against.

Manchester Core Strategy

Policy DC 17.1 states that;

> *'Applications for telecommunications development will normally be approved if the Council can be satisfied that the development has been sited and designed to minimise its impact on residential amenity and in environmentally sensitive areas. Wherever possible the Council will expect the potential of existing buildings and masts, including the sharing of such facilities, to be fully explored before agreeing to additional separate development.'*

In the justification to Policy DC 17.1 the Council recognises the need for Manchester to be at the forefront in the field of telecommunications. The Council therefore starts from the presumption in favour of sustainable development and investment in the telecommunication systems serving the city. Equally, it wishes to ensure that new developments are brought forward in a way which protects residential amenity and minimises the visual impact of such development particularly in conservation areas and other environmentally sensitive areas in parks and the river valleys. The Council is also concerned to make maximum possible use of existing buildings and facilities by encouraging operators to share facilities wherever possible in order to avoid unsightly duplication and clutter.

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Places for Everyone Joint Development Plan

Objective 9: 'Ensure access to physical and social infrastructure' states;

"We will:

- *Improve the capacity and network coverage of digital, energy, telecoms, transport and water in key growth locations."*

The proposed works on this site would not be to the visual detriment of the surrounding area and would not result in demonstrable harm to the character of the area, but they are necessary to ensure improved delivery of service. Whilst any development will have an impact, this proposal will provide a demonstrable benefit to the area, which would respect and continue to maintain the appearance of the area whilst being a suitable distance from potentially sensitive users.

The Applicant is of the impression that this proposal complies wholly with the relevant policies. As part of this assessment, the Applicant has explained, in great detail the specific siting and design measures that are specifically aimed at reducing the visual impact for sensitive receptors. When taking a collective approach, it is thought that this location maximises, as far as practically possible upon the intentional siting and design measures, whilst ensuring that the specific operational needs are met.

It is thought to be extremely unreasonable to expect such niche infrastructural developments (whose form is dictated by strict operational requirements) to adhere to more general policy criteria. The pole itself cannot physically enhance the area but the public benefit that it will provide is believed to outweigh this, providing good placemaking opportunities. The Applicant believes that it is as respectful as practically possible, within the limits of the operational requirements.

Biodiversity Net Gain

From 2nd April 2024, all Minor and Major applications are required to demonstrate a 10% increase in biodiversity value, which is to be secured through a Biodiversity Net Gain plan. In light of this, the Applicant would like to bring the readers attention to the list of exemptions in place. Some of which include permitted development applications and development sites that are less than 25m2 or 5m of linear habitats. Therefore, it was not considered applicable for this proposal.

Planning Assessment

The principle of development has been established by the Government when the new permitted development rights came in to force in April 2022, which enabled sites such as this one to be built under the operators permitted development rights, with prior approval for siting and appearance being the only matters that the local planning authority can take into consideration.

Planning Practice Guidance explains how a prior approval application differs from a planning application at paragraph 28. It states that:

'The statutory requirements relating to prior approval are much less prescriptive than those relating to planning applications. This is deliberate, as prior approval is a light touch process which applies where the principle of the development has already been established (emphasis added). Where no specific procedure is provided in the General Permitted Development Order, local planning authorities have discretion on what processes they put in place. It is important that a local planning authority does not impose unnecessarily onerous requirements on developers and does not seek to replicate the planning application system' (emphasis added).

The main issues arising from this prior approval notification are whether the proposed pole and cabinets due to their scale and siting would be a visually obtrusive feature which would be detrimental to the character and appearance of the area. Additionally, whether any perceived harm would outweigh the significant social and economic benefits associated with the increased service provision attributed to the proposal and other valid material considerations as outlined in the NPPF, which fully supports the roll out of 5G and the next generation connectivity to accelerate business opportunities and growth to ensure the economy is resilient and competitive, along with the relevant planning policies in NPPF and the relevant Local Plan policies.

Irrespective of the installation's use as a telecommunications base station, the introduction of a new mast will always be, to some degree, a noticeable addition to regular passers-by and residents found closest when seeking out its presence. However, it should be recognised that visibility does not automatically equate to an overwhelming adverse harm occurring nor is there a right to a view. Therefore, just because the base station will be seen and is different to an existing structure that people have become accustomed to, then this should not automatically equate to the mast being unacceptable. A balanced assessment should be made when considering all material planning considerations, most notably there should be an appreciation of what is achievable within the scope of telecommunication infrastructure that has ultimately influenced the scheme's siting and appearance.

The applicant contends that when assessing the impact of the subject proposal, there needs to be reasonable consideration about where and in what context views of the development will be afforded; just because a development is generally visible and is in proximity to residential areas where demand is highest, does not necessarily equate to a significant detrimental 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.

This position was confirmed at appeal for a radio base station in Barnet. In allowing the appeal for a 20m mast and 4 radio equipment cabinets in its own fenced compound at Hadley Wood Station, Inspector Fort stated at paragraph 21 of his decision:

> *'The proposal may be visible from windows of residential properties. However, due to the separation distances achieved between it and the nearest dwellings and its relatively slim profile at higher level, it could not be said to constitute an overbearing structure that would be unduly harmful to outlook. In terms of the proposal's effects on private views, these are matters that the Courts have held can rarely be instrumental in planning decisions, and as such I only attach very limited weight to these considerations in arriving at my decision'.*

The proposed works are not to the visual detriment of the surrounding area (being suitably distant from sensitive receptors). It is appreciated that the monopole itself can be a dominating component, but it cannot be screened for operational reasons and any attempt to do so would look unusual and unrealistic in this setting. From an operational perspective, antennas must 'see' the area they are providing service to, otherwise they cannot send a signal, and they cannot work. This is reflected in the 20m height requirement of the proposed monopole. Further to this, each element of this proposal has been limited to an operational minimum in terms of size and amount.

The apparatus should not appear significantly obtrusive from surrounding viewpoints and in relation to the overall context, i.e. the existing vertical street furniture; the size of the surrounding natural and built environment; its neighbours; the distances involved; and the presence of both intervening and wider panoramic features must be taken into account. One will note the variety in size, scale, age and architecture of the buildings present and the amount and variety of infrastructural features that exist.

The applicant has suggested the installation of a pole which will be galvanised grey to achieve least contrast when viewed against the built environment and commonly grey sky, thereby minimising its visual impact and allow the pole to assimilate with the immediate surroundings and the context in which it will be seen. The applicant is however open to discuss colour options should the LPA wish to do so.

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Further the site is not located in close proximity to listed or locally listed heritage assets or their settings.

The proposal would not result in demonstrable harm to the character of the immediate or wider area but are vitally necessary to ensure improved delivery of service. The proposal would respect and continue to maintain the character of the area, would be suitably distant from potentially sensitive users, and so would accord with the principles of the relevant Development Plan policies. It fully accords with the requirements of the NPPF.

Economic and Social Benefits

The NPPF strongly supports sustainable development, as does the Manchester Core Strategy. Mobile communication plays a significant role in sustainable development, being able to access the internet via a mobile device allows people to access a wide range of central and local government services buy groceries, manage finances, apply for jobs/university, and carry out school projects, send emails, download applications, send and receive instant messages, participate in social media, streaming and downloading data to name just a few of the benefits of being able to use an internet enabled handheld device. It also allows people to work from home or on the move without needing to return to the office. Residents and businesses will enjoy better accessibility, assisting home-base working by improving the electronic means of communication and the roll-out of high-speed broadband helping to promote live-work development. This reduces travel time, carbon emissions and increases the speed in which information is processed/shared. The proposals therefore fully comply with NPPF and the Local Development Plan to minimise the effects of climate change reducing the need to travel and therefore the carbon footprint.

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. It also helps the economy to be resilient and competitive. This is in full accordance with the ambitions of the Manchester Core Strategy. It will help Blackey become an area where its businesses, public service providers and citizens are using digital technology by default and to the fullest to grow their businesses and improve productivity to access skills, training and employment opportunities to address global challenges that have a local impact such as ill health, social isolation, and pollution; to improve living standards and well-being, helping people to lead prosperous and rewarding lives; and to improve the quality and value for money of public services.

In such instances, as described above, the NPPF supports development that improves the economic, social and environmental conditions in the area. Enhancing the 2G and 4G coverage and capacity in this area and enabling future 5G services will fully meet this national policy objective.

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). Numbers of this scale cannot be underestimated. Mobile connectivity is essential to creating a better society. Digital inclusion can help people

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gain employment, become more financially secure and improve health and well-being. 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.

The relationship between 5G and education is evolving at a massive rate with educators exploring the relevance of Virtual Reality (VR) technologies for education and training. Crucially, VR can support remote learning, allowing students a presence in the classroom even when working elsewhere. 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high-definition images and video), increased capacity and heightened security will also allow learning on the job, thanks to technologies such as Augmented Reality (AR) goggles, which can give engineers real-time instructions on how to fix a machine on a production line.

It can revolutionise the retail industry by creating new experiences which is particularly relevant for the small businesses nearby; augmented reality will enable customers to try before they buy, it can create highly personalised shopping experiences by introducing LED screens, mood flooring, and magic mirrors for a fully interactive experience. A study by Grand View Research found that 5G powered Internet of Things hardware in retail environments is set to grow to more than $94bn by 2025. It can also create safer and more efficient shops as the low latency of 5G technology means there will be no waiting time and will enable widescale and efficient rollout of automatic scan and checkout and contactless payments. Amazon's contactless Amazon Fresh stores in London are already using this technology, allowing shoppers to use Just Walk Out Technology which automatically detects when products are taken from or returned to the shelves and keeps track of them in a virtual basket.

Health Benefits

Patients across the country are now becoming accustomed to relying on remote healthcare services such as NHS 111, virtual GP appointments, and ordering online deliveries of essential medical supplies. 5G will prove critical in providing the infrastructure required to deliver remote health services over the next decade. By design, 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high definition images and video), increased capacity and heightened security are going to be fundamental in scaling the patient benefits of remote healthcare and keeping medical records secure and private. For instance, trials have shown that connecting ambulance crews to expert resources using 5G allows paramedics to work with doctors and conduct specialist procedures in real time whilst on the road.

Bristol harbour installed thermal cameras specifically designed to alert the authorities when people fall into the water. The technology was implemented after ten people tragically died in drowning accidents in the city in one year alone. The thermal cameras pick up when a person breaks a virtual barrier at the harbour edge - the council control centre is notified via 5G technology, and the local fire and rescue is subsequently called out if required. The lives of two people have already been saved by the technology. It can also create a better organised service where ambulance crew can instantly transmit life-saving details about a

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patient's condition to awaiting emergency departments. Information, from ultrasound images to blood pressure readings, and from heart rate to body temperature, can be sent to doctors ahead of an ambulance patient's arrival. This technology is not hypothetical – 02 and Vodafone began trialling 5G "smart ambulances" in the East of England and Milan.

Furthermore, the Future Communications Challenge Group has estimated that the economic impact of 5G on the UK could be around £112bn in 2020 per annum, rising to £164bn in 2030. In other words, about £2,500 per head of population. Numbers of this scale cannot be underestimated.

Conclusion

In conclusion, material planning weight should be given to constraints of the search area that has resulted in the pursuit of this scheme. Moreover, weight should be assigned to the need and the delivery of enhanced network coverage in fulfilling the operator's technical requirements in this part of Manchester. In this respect the proposal is in accordance with the relevant planning policies and when taking a balanced assessment, any foreseen harm will be less than substantial and outweighed by the social and economic benefits the development will bring to the area.

Central Government attaches great importance to the design of the built environment and outlines this within Section 12 (para. 126) of the National Planning Policy Framework. It states:

> *"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."*

The applicant acknowledges that the local environment is unique, contributed to by the associated land uses, however, it should also be appreciated that each generation should therefore shape and sustain the built environment in ways that allow people to use, enjoy and benefit from it, without compromising the ability of future generations to do the same. Change in the built environment is inevitable, caused by natural responses to social, economic, and technological change. There should be a clear distinction between 'harm' and 'visibility'. Just because something is visible, does not necessarily infer that it is inappropriate to the street scene, or will lead to 'harm'.

Without this proposed site, network coverage for Vodafone in this area prevents the customers for the leading network operator from accessing their mobile devices contrary to the operators' license agreement and purposes in which the consumers purchased their mobile handsets, as well as being contrary to the guidance set out in NPPF. It will also be contrary to the aspirations of Manchester City Council, tasked with supporting the delivery of improved digital connectivity by the Department Of Digital, Culture, Media and Sports (DCMS).

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 is 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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