

SITE SPECIFIC SUPPLEMENTARY INFORMATION AND PLANNING JUSTIFICATION STATEMENT PREPARED BY DOT SURVEYING

1. Site Details

Site Name:	Crowcroft Park	Site Address:	Crowcroft Park Stockport Road, Levenshulme, Greater Manchester, M12 4QE
NGR:	E: 387291 N: 394932		
Site Ref Number:	96712	Site Type:	Marco NTQ Replacement

2. Check List

Site Selection

Was Manchester City Council mast register used to check for suitable sites by the operator or the LPA?		No
If no explain why:		
It was felt that the industry database was a more up to date source of information.		
Was the industry site database checked for suitable sites by the operator:	Yes	
If no explain why:		
N/A		

Pre-application consultation with LPA - Stafford Borough Council

Written offer of pre-application consultation:	N/A	
Was there pre-application contact:		Yes
Date of pre-application contact:	13 th September 2023	
Name of contact	The Director of Planning – via Email.	

Summary of outcome/Main issues raised:

At the time of this pre consultation, and despite our attempt to engage in pre-application dialogue with the LPA, no comments had been received in respect to the proposals.

Ten Commitments Consultation

Rating of Site under Traffic Light Model:

Amber

Prior to the submission of this application, pre-consultation was initiated with the local planning authority, providing an opportunity to discuss the development proposal and identify any site-specific issues. Further consultation has also been carried out with local councillors for Levenshulme - Councillor Zahid Hussian, Councillor Dzidra Noor, Councillor Basat Sheikh. Schools that fall within a 400m proximity – Crowcroft Primary School, Early Inspirations Nursery and St Richard's R.C. Primary School were also issued a letter, drawings, and a site detail sheet. Oxford Road Helipad which falls within 3km from the site, was also consulted.

The site has been given an AMBER rating under the Traffic Light Model 'TLR'.

Summary of outcome/Main issues raised:

No responses had been received at the time of submission.

School/College

Location of site in relation to school/college:

There was three educational establishment within 400m of the proposed site: Crowcroft Primary School, Early Inspirations Nursery and St Richard's R.C. Primary School.

Outline of consultation carried out with school/college:

Pre application communication was made to the above schools, via email this included the site detail sheet, a letter consulting them of the proposed works and drawings.

Summary of outcome/Main issues raised:

No responses had been received at the time of submission.

Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation (only required for an application for prior approval)

Will the structure be within 3km of an aerodrome or airfield?		Yes
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		Yes

Details of response:

The Oxford Road Helipad (MFT) falls within approximately 2.29km of the site. Despite, the helipad being notified, no response was received.

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	28 th September 2023	

3. Proposed Development

The proposed site:

Significantly, this proposal is to replace an existing installation and is not a new additional mast. This new mast is required since MBNL was given an NTQ (Notice to Quit) regarding their current installation.

The current site is being replaced at Crowcroft Park, Stockport Road, Levenshulme, Greater Manchester, M12 4QE comprises of a new 25m high monopole to replace a nearby site, including 6No. apertures at 23.65m and 4No. 600mm dishes at 19.65m. Alongside, the installation and replacement of ancillary work as shown on the attached drawings, to provide the local area with 2G/4G and 5G.

The existing site can be seen below, Figure 1, whereby an NTQ was issued. The existing rooftop site located on Swallow Street in Levenshulme in South Manchester is due to be redeveloped, however the telecommunications site cannot retain. Therefore, the proposed location of the telecommunications site, is needed to replace this site. This can be seen in Figure 2 and Figure 3.

Figure 1: An image to show the location of the existing telecommunication site, image taken from Google Images.



Figure 2: An image to show the location of the proposed site to replace the existing site, extract taken from Grid Reference Finder.



Figure 3: An image to show the land of the proposed monopole and equipment.



The proposed site shows to be on land nearby the existing telecommunication site, therefore this helps in lessening the visual impact of the proposed new monopole. The surrounding area offers some screening despite being located in a urban area, the monopole is on empty land that overlooks the A6 road that is not overlooked by direct housing. The park is enclosed by high trees that minimises the visual appearance of the site, acting as a natural background to the proposed development. It is also clear that Stockport Road, shows to have a developments within the commercial area, this mitigates the visual impact.

It is also important to acknowledge that the proposed monopole, has been kept to a minimum in height whilst providing the best technology for the area. The development has been positioned near users in order to meet operational needs, but it has also been placed away from densely populated regions in order to prevent the project from being aesthetically invasive.

The area being located by the A6 and commercial shops helps screen the area, due to the use of monopole lighting columns, and signage contributing to the creation of a street scene. This is beneficial towards a telecommunications development as the assimilation of equipment into the street scene with help to reduce the visual appearance of the equipment. The proposal has been sited in an area that keeps the development close by to users, helping to reach operational requirements, whilst also being sited away from highly residential areas to avoid the proposal becoming visually intrusive.

There are three main elements to a radio base station; the cabin or cabinets which contain the equipment used to generate the radio signals, the supporting structure that holds the antennas in the air or fixes them to a building or structure and the antennas themselves, which emit the radio signals (along with any necessary amplifier or receiver units). In this case the monopole structure. Other elements necessary for the base station to function are the links into the network either by fibre cabling or by dish antennas, power source (meter cabinet or generator where a REC supply cannot be utilised), feeder cables that link the equipment housing to the antennas and the various support structures, grillages and fixings, often referred to in general terms as “development ancillary to” the base station.

The technical details of this proposal are illustrated within the enclosed application design drawings: - 1702793_MAN665_96712_M2811_M001. The proposed equipment is considered unlikely to have any material impact on the local area as this is a site to replace an existing site, whereby planning permission was already approved. Ultimately, without this site it will result in a severe loss of mobile connectivity in Levenshulme.

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. In particular, the design of the antennas, and the separation required from other items of associated equipment.

Type of Structure:	Monopole
Description: The proposed installation comprises of a new 25m high monopole to replace a nearby site, including 6No. apertures at 23.65m and 4No. 600mm dishes at 19.65m. Alongside, the installation and replacement of ancillary work as shown on the attached drawings. This proposal is to replace an existing site that must be removed due to redevelopment purposes.	
Overall Height:	25m AGL
Height of existing building	N/A
Equipment Housing:	
Length:	See drawings
Width:	See drawings
Height:	See drawings
Materials	
Tower/mast etc. - type of material and external colour:	Galvanised
Equipment housing - type of material and external colour:	RAL7035 / Steel

Reasons for choice of design:
The use of a monopole is to minimise any visual impact upon this area, whilst being able to facilitate 2G/4G and 5G capacity and coverage to the surrounding area. The site has also been designed to provide 5G coverage for both EE and H3G without any further changes to the external appearance of the development. This will guarantee that the community will be at the forefront of the next technological development being introduced.

4. Technical Information

ICNIRP Declaration attached ICNIRP (International Commission on Non-Ionizing Radiation Protection) aims to protect people and the environment against adverse effects of non-ionizing radiation (NIR). Public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines. When determining compliance, the emissions from all mobile phone network operators on the site are taken into account.	Yes	
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5. Technical Justification

Reason(s) why site required
The National Planning Policy Framework (NPPF) clearly states that authorities should NOT question the need for the service, nor seek to prevent competition between operators. Notwithstanding this, the Applicant considers it important to explain the positive technical justification for the site and how the facility fits into the overall network. The site is required to provide new 5G coverage for H3G LTE and 4G capacity, improving service in and around the surrounding area. The cell search areas for 5G are extremely constrained with a typical cell radius of approximately 50m. In general, it would not be feasible to site the installation too far from the target locale.

6. Site Selection Process – alternative sites considered and not chosen.

Discounted Options
In accordance with the sequential approach outlined in the National Planning Policy Framework (NPPF), the following search criteria have been adopted. Firstly, consideration is always given to sharing any existing telecommunication structures in the immediate area, secondly; consideration is then given to

utilising any suitable existing structures or buildings and thirdly, sites for freestanding ground-based installations are investigated.

This sequential approach is outlined below:

- a) Mast and Site Sharing
- b) Existing Buildings Structures
- c) Ground Bases Installations

In compliance with its licence and the sequential approach outlined in the NPPF, all attempts to utilise any existing telecommunication structures where they represent the optimum environmental solution have been employed. The Mast Data register is always examined prior to the submission of a planning application.

Discounted Options and National Planning Policy:

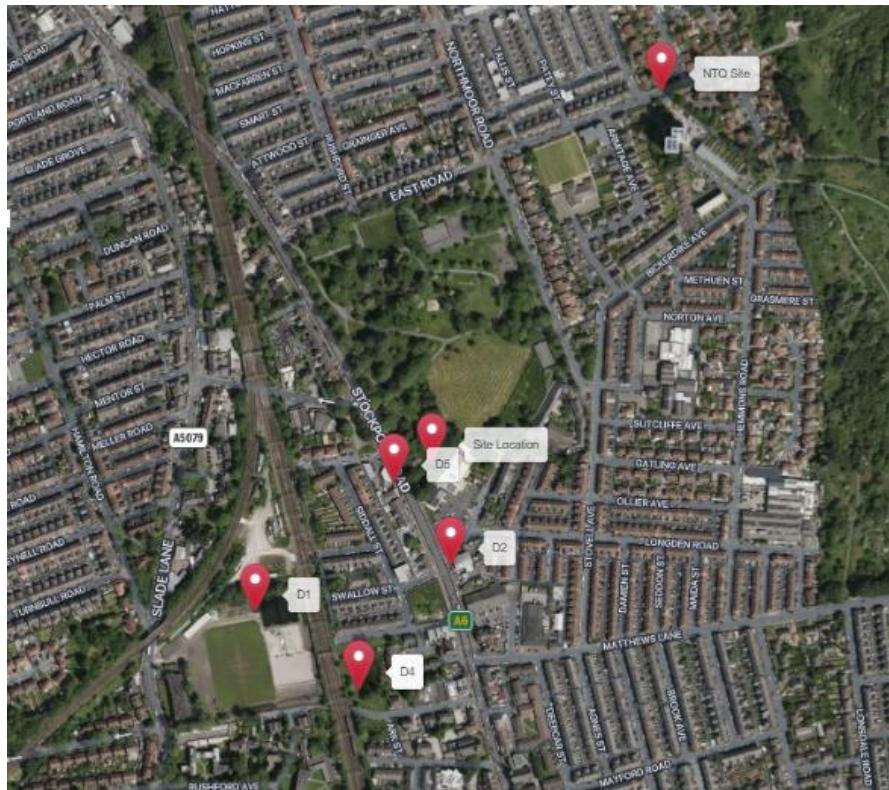
The National Planning Policy Framework (NPPF) is clear that LPAs should not question the need for the installation under Part 116:

“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”.

Site	NGR	Discounted Reason
D1 Park Grove, Levenshulme, Manchester, Greater Manchester, England, M19 2FH	E: 387091, N: 394764	This option has been discounted as a previous telecoms site was at this location however it appears the local football ground had utilised the extra space for car parking.
D2 Longden Road, Stockport Road, Levenshulme, Manchester, Greater Manchester, England, M13 0RG	E: 387311, N: 394816	This streetworks option has been discounted as outside the petrol station was discounted due to insufficient space for equipment.
D3 Park Grove, Levenshulme, Manchester, Greater Manchester, England, M19 3AQ	E: 387207, N: 394677	This greenfield option was discounted due to close proximity to residential properties and the topography of the land.
D4 Stockport Road, Levenshulme, Manchester, Greater Manchester, England,	E: 387207, N: 394677	This option has been discounted because of overhanging branches from trees in the park and close proximity to residential properties.

M12 4GD		
D5 A6 Cycle Warehouse, 754, Stockport Road, Levenshulme, Manchester, Greater Manchester, England, M12 4GD	E: 387248, N: 394910	This option was discounted due to a speed camera in close proximity, a street works site may interfere with the camera and cause issues.

Figure 4: An image to show the discounted sites.



The Manchester City Council Core Strategy was reviewed and despite no specific legislation in relation to telecommunications infrastructure and development. There shows to be a close relation of digital connectivity and infrastructure to Objective 2 Economy.



Objective 2 Economy and City Centre 8

Manchester City Council | Manchester Core Strategy 2012 to 2027

8.76 The South Manchester area is popular with families and skilled workers and provides a significant workforce for the City. It is considered the only area in the City (apart from the City Centre) that currently offers the opportunity to attract and retain a significant number of higher income groups. Their presence is critical to sustaining the City's economic growth. However high levels of deprivation are still found in Chorlton Park, Old Moat, Burnage and Fallowfield.

8.77 This area is not a focus of new employment growth in the City during the Plan period, largely due to the limited space for development within South Manchester. Employment provision is focused along Princess Parkway and the existing business parks of Towers, Didsbury Point and Parkway. Other key employment locations include Christies Hospital and Christie Fields. Demand for future employment is expected to be driven by manufacturing and engineering, creative and media industries and environmental technologies. The area is expected to be a focus for entrepreneurs, micro-enterprises and other small businesses. This may include encouraging provision of improved digital connectivity which will support home-working and SMEs.

8.78 Most residents travel to work outside South Manchester to the major employment centres such as the City Centre and Manchester Airport. Accessibility to employment along radial routes is considered to be generally good. However, east/west links do not match the radial routes particularly for those using public transport. The aim will be to strengthen connectivity within the area to key employment locations and this will be further improved through the provision of a new Metrolink line connecting the City Centre to the Airport via South Manchester. The area is also traversed by a heavy rail line and bus corridors and mixed use development including employment provision will be encouraged around these interchanges and stops.

Therefore, we believe this proposed development to replace an existing site fully complies with Manchester City Council Core Strategy 2012-2017, as it works to increase the boroughs economic competitiveness and attractiveness whilst not impacting visual amenity.

7. Additional Relevant Information

Background to the Proposal

H3G supports Government ambition to be a global leader in the next generation of mobile technology set out within its March 2017 white paper, 'Next Generation Mobile Technologies: A 5G strategy for the UK' and expand its mobile network across the Manchester City Council area and specifically in this instance, to enhance 5G coverage levels in and around this area of Leve.

Modern mobile phone base stations operate on a low power and accordingly, need to be located within close proximity to the areas they are required to serve. Increasingly, people are also using mobile devices in the home which requires the installation of base station infrastructure closer to such residential areas.

The proposed scheme has been designed to ensure the fundamental principles of good siting and appearance are adhered to. The overall impact of the installation on the environment is therefore considered limited when viewed in the context that high-speed mobile connectivity is the lifeblood of a local community, which aligns with the local development plan,

DEVELOPMENT PLAN POLICY:

Development plan considerations have a special significance in law. Section 54A of the Town and Country Planning Act 1990 (The Act), and re-iterated in Section 38 of the Planning and Compensation Act 2004, stated that:

“Where in making any determination under the Planning Acts regard is to be had to the Development Plan, determination shall be made in accordance with the Development Plan unless material considerations indicate otherwise.”

NATIONAL PLANNING POLICY:

National Planning Policy Framework

The National Planning Policy Framework was revised on 5th September 2023 and sets out the government’s policies for England and how these are expected to be applied.

This revised Framework replaces the previous National Planning Policy Framework published in March 2012, revised in July 2018 and updated February 2019 and revised in July 2021.

The most recent NPPF demonstrates continued government support for telecommunications infrastructure and recognises its importance:

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. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).

115. 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.

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 structures interfering with broadcast and electronic communications services.

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 34 and a statement that self-certifies that, when operational, International Commission guidelines will be met.

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.

The purpose of the planning system is to contribute to the achievement of sustainable development. There are three dimensions of sustainable development, each of which give rise to the need for the planning systems to perform a number of roles including:

- Economic Role - contributing to building strong, responsive and competitive economy;
- Social Role - Supporting strong vibrant and healthy communities; and
- Environmental Role - Contributing to protecting and enhancing our natural, built and historic environment.

The NPPF contains at its core a presumption in favour of sustainable development which runs through both plan-making and decision-making processes. The NPPF recognises the vital importance of high-quality telecommunications and dedicates a whole chapter to this area. Chapter 10 of the NPPF outlines the Government's support for high quality communications. The paragraph extracts highlighted below, clearly outline the overarching support from Central Government for telecommunications and how Local Planning Authorities should embrace this vital infrastructure:

Paragraph 114 states:

“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. Policies should set out how high-quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).”

It continues:

“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.”

Operators always follow the sequential site selection process. Where an existing site can be shared or upgraded this will always be adhered to before a new proposal is put forward for

consideration.

The support for telecoms and the need not to constrain Operators is laid out:

“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.”

Conclusion

We consider that the development is compliant with the Sefton Council Local Plan Policies and National Planning Policy Framework to promote telecommunications, this proposal is extremely important to ensure there is no loss of mobile connectivity in the area.

This statement and the other accompanying material have demonstrated that the proposal is in accordance with local Development Plan policy and NPPF. In particular it is a form of development that is specifically encouraged as a matter of principle and in its detail complies with the policy objective of minimising potential environmental impact.

In conclusion, the application is for sustainable development, acceptable as a matter of principle and appropriate in its detail and so one which the presumption in favour of granting planning permission applies. We believe this proposed development to install this site, to replace the existing NTQ site nearby is fully compliant with the local plan and urge the LPA to approve this telecommunication installation.

Contact Details

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Signed:		Date:	<u>28th September 2023</u>
Position:	Planner	Company:	<u>Dot Surveying Ltd</u>
		(on behalf of above operator)	

