



WHP Telecoms Ltd, 1a Station Court, Station Road, Guiseley, Leeds LS20 8EY

Our ref: 238897

Date: 13th July 2022

The Chief Planning Officer
The Planning Department
Manchester City Council
PO Box 532
Town Hall
Manchester
M60 2LA

Dear Sir / Madam,

Cellnex UK and EE Ltd and Hutchison 3G UK Ltd

Submission of an Application for Planning Permission and Listed Building Consent

Proposed Additions to Existing Base Station installation at Rooftop at Clayton House, 59 Piccadilly, Manchester, Greater Manchester, M1 2AQ

On behalf of EE Ltd and Hutchison 3G UK Ltd, in conjunction with Mobile Broadband Network Limited (MBNL), we submit herewith an application for planning permission for the installation of 5G electronic communications equipment and associated ancillary development at the above site. This application follows the completion of our pre-application engagement exercise, reflecting so far as is practicable the guidance and comments offered.

We enclose the following:

- i. The completed planning application forms, including the relevant landownership and agricultural holdings certificates
- ii. An O.S. site plan scale (1:2500) Reference: 238897 (87486_00_004_ML002 Rev 2) showing the red line area;
- iii. Drawing nos. 238897 (87486_00_000_MD002 Rev 2, 87486_00_002_MD002 Rev 2, 87486_02_100_MD002 Rev 2, 87486_02_101_MD002 Rev 2, 87486_02_150_MD002 Rev 2, 87486_02_151_MD002 Rev 2)
- iv. Electronic payment of £462.00 in respect of the appropriate fee.
- v. 5G Technical Support document
- vi. National Policy – Delivering Ultra-Fast Broadband Mobile Connectivity
- vii. 5G – Helping tackle climate change document
- viii. A certificate of ICNIRP compliance
- ix. 5G Health and Safety document

The Proposed Development

The operators already provide coverage from an existing base station at this site but have a requirement to install the 5G electronic communications apparatus referred to in this letter and shown in the submitted drawings.

The deployment of 5G will utilise the Mobile Network Operators (MNOs) existing 3G and 4G networks such as the base station already existing at the application site. As such, the application site is likely to carry different mobile connectivity services in parallel, with high data uses operating through the new 5G higher capacity network apparatus subject of this application. As a consequence, this particular technical requirement is not one that can be met on an alternative site.

There is significant UK Government support for the delivery of 5G, particularly as this new connectivity will be a step change from earlier generations of mobile connectivity and will be critical to economic growth and sustainable communities. We explain this in more detail in the document **‘National Policy – Delivering Ultra-Fast Mobile Connectivity’** which supports this application. In addition, modern connectivity, such as 5G, will be essential to help the Government meet its wider sustainability and climate change targets and we explain this in more detail in our accompanying document **‘5G – Helping tackle climate change’**.

The amount of development, its design and the location of the apparatus at this existing electronic communications site has been guided by the technical and operational requirements of the operators 5G system having proper regard to minimise appearance.

Unlike earlier generations of mobile connectivity, 5G has more significant technical and operational requirements and this has implications on the amount, height, position and design of the new base station apparatus. To help explain this important detail, we have set this out in more detail in our accompanying **‘5G Technical Support’** document which should be carefully considered.

Having regard to the nature and appearance of the structure as a whole, the proposed works should have no adverse impact, or no more than a minimal adverse impact, on its appearance. The 5G electronic communications apparatus proposed should not materially affect the overall appearance of the existing site to any noticeable or adverse degree from any public vantage points.

The apparatus proposed will not bring about any additional requirements with regard to access. Access to this operational site will, therefore, remain the same as the current arrangements as shown on the enclosed Plan reference 238897 (87486_00_004_ML002 Rev 2).

In accordance with all relevant health and safety regulations and guidelines, access to the site is restricted to authorised personnel and access for maintaining or servicing all the apparatus can only be carried out by properly trained and qualified staff. Such routine operations will continue to be carried out roughly once a quarter, with no requirement to increase this arising out of the development proposed. The application does not therefore give rise to any public issues associated with access.

As the apparatus proposed will lead to significant improvements to a public service provided in the local area, the application merits support and accords in all respects with national policy as set out in our supporting document **‘National Policy – Delivering Ultra-Fast Mobile Connectivity’**, especially the National Planning Policy Framework. The proposal looks to meet all relevant local policy.

This letter and the enclosures also provide due notification, as may be required, under the relevant conditions of the Electronic Communications Code (Conditions and Restrictions) Regulations 2003, as amended. In particular, you are given notice of the intention to install the electronic communications apparatus described in more detail in the application documentation (including the

scale drawings) and to be located as shown on the application plans. No fee is required for this separate statutory notification.

We indicated in our prior engagement letter that the Traffic Light Rating was amber. The prior engagement carried out suggests this rating to be correct and we have not altered it.

Health and Safety

In support of the application, we include a separate document called '**5G Health and Safety**' which sets out in more detail the associated health and safety considerations. Every installation on a site owned or managed by Cellnex will be compliant with international standards adopted by the UK Government. A certificate confirming compliance with the relevant ICNIRP guidelines on public exposure has been supplied with this application.

The ICNIRP guidelines seek to protect against the well-known thermal effects of radio emissions and include a significant precautionary factor. These guidelines apply to all forms of electronic communications and mobile technology is one of the lowest powered of these.

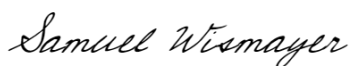
National planning policy remains clear, provided an application is certified as ICNIRP compliant, local planning authorities should not seek to effectively set different guidelines through the refusal of planning permission.

We would be willing to meet to discuss the merits of the application, or to assist with any visits of the site and surrounding area, if this is beneficial to the determination of the application.

As the proposal entails the development of infrastructure necessary for the delivery of vital 5G public services, we ask that you progress the determination of this application in an expeditious manner and request that you use your delegated powers if available.

We trust everything is in order, but please contact me if you require any additional information or clarification in relation to the proposed development.

Yours faithfully



Sam Wismayer BSc (Hons)
s.wismayer@whptelecoms.com

On behalf of Cellnex UK Limited