SITE SPECIFIC SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Upper Brook Street	Site Address:	275 Upper Brook Street, Manchester, M13 0HR
NGR:	E: 385358, N: 396014		
Site Ref Number:	JET 159	Site Type: Macro	SW – Macro

2. Pre-Application Check List

Site Selection

Was an LPA mast register used to check for suitable sites by the operator or the LPA?	**Yes**	
If no explain why: N/A		
Was the industry site database checked for suitable sites by the operator:	**Yes**	
If no explain why: N/A		

Pre-application consultation with LPA

Written offer of pre-application consultation:	**No**	
Was there pre-application contact:		**No**
Date of pre-application contact:	**N/A**	
Name of contact:	**N/A**	
Summary of outcome/Main issues raised: N/A		

Ten Commitments Consultation

Rating of Site under Traffic Light Model:		Amber		
Consultees:-	N/A			

Summary of outcome/Main issues raised:	N/A

School/College

Location of site in relation to school/college: There are none in the immediate vicinity
Outline of consultation carried out with school/college: N/A
Summary of outcome/Main issues raised: N/A

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?		**No**
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		**No**
Details of response: The proposal is significantly further than 3km away from an aerodrome or airfield.		

Developer's Notice

Copy of Developer's Notice enclosed?	**Yes**	
Date served:	**1st June 2026**	

3. Proposed Development

The proposed site:

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

This Planning Statement has been prepared on behalf of Jet Infrastructure in support of a proposed telecommunications installation required to address a critical gap in network coverage within the Upper Brook Street area of Manchester.

The proposal will deliver new and improved service for VMO2 customers and forms part of a targeted network improvement programme aimed at enhancing existing 4G service and introducing 5GSA capability to meet rising consumer demand, improve coverage and deliver increased network capacity, required to resolve a significant local service deficiency.

Currently, VM02 customers have limited coverage and capacity in this area. Network 'capacity' is an increasing challenge in densely populated urban areas where there is exponential growth in demand for data services to facilitate data hungry applications and devices. While 'coverage' may be present, the network has insufficient 'capacity' to handle the volume of user traffic and so calls are dropped and data based applications continuously buffer without being usable.

This is demonstrated by the crowdsourced network performance data shown below. Red obviously demarks poor capacity and network performance while green is quality performance.

This is clear that there is a sizeable area with poor coverage in the local area and surrounding residential areas, with only sparodic patches of good coverage. This indicates there is currently poor network performance and insufficient network capacity in the area.


Manchester
University Hospitals
(central site)
Oxford Road
York Place
North Road
Upper Brook Street
Hathersage Road
Park
Wilmslow Road
Oxford Place
P



Therefore, to provide additional network capacity, coverage and the most up to date technology and service to the area, there is a requirement for VMO2 build a new base station in the area that can host the necessary equipment.

Furthermore, the VF kit is only on 3G, and the site will go offline as part of the 3G shutoff, meaning VMO2 desperately need a solution in the area.

As such a new site must be found in the area to improve coverage and capacity. The great effort has gone into finding a location that minimises impact while delivering that improved service.

Site Location

Upper Brook Street (M13 0HR) is located within a highly urbanised corridor to the south-east of Manchester city centre. The character of the area is predominantly commercial and mixed-use in nature, with a strong presence of takeaway restaurants, local retail units and service-based businesses fronting the A34 corridor. The street forms part of a major arterial route into the city and experiences high levels of vehicular and pedestrian activity throughout the day.

The immediate townscape is characterised by continuous frontage development, hard urban surfaces, street lighting, traffic signage and associated highway infrastructure. The area has a busy and functional appearance, with limited opportunities for long-distance views due to the density of surrounding development. Built form generally ranges from two to four storeys, creating a well-enclosed streetscape typical of an inner-city environment.

Land uses in the vicinity are varied, including food and drink establishments, retail premises, residential accommodation above commercial units and educational facilities associated with the nearby university and hospital districts. This results in a mixed and evolving urban character

where modern infrastructure is commonplace and generally assimilates within the existing streetscene.

Overall, the character of the site can be described as a busy commercial urban corridor with a strong transport function, substantial existing street furniture and a diverse mix of commercial, residential and institutional land uses. The surrounding environment is therefore generally capable of accommodating additional telecommunications infrastructure without appearing materially out of keeping with the established character of the area.

The site itself is situated within a predominantly urban environment characterised by a mix of commercial, industrial and transport-related land uses. The surrounding townscape contains a variety of modern built form and infrastructure, including highways, street lighting, utility apparatus, signage and other vertical features that contribute to a visually active streetscene. The area exhibits a functional and developed character, with existing infrastructure forming an established component of the local environment.

Views within the vicinity are generally influenced by surrounding development and transport infrastructure, resulting in a contained urban setting where modern structures are readily accommodated. The presence of existing street furniture and utility equipment contributes to a degree of visual complexity, reducing the prominence of additional telecommunications infrastructure when viewed in the context of the wider streetscape.

Overall, the site is located within a robust urban character area where telecommunications equipment would be viewed alongside existing infrastructure and development, and would therefore appear consistent with the established appearance and function of the surrounding environment. There are also a number of tall buildings in the area to provide screening at medium and long range views.

This is a search area that is made up of commercial and industrial land uses. There is also a proliferation of underground services that we cannot site on top of.

This means there are limited siting options in the area.

Efforts have been made to minimise both the impact on visual/residential amenity and the heritage assets (Listed Buildings) in the wider area. We feel that the proposal put forward certainly minimises harm and is the best and least impactful viable option in that challenging search area.

The proposal causes negligible harm to residential amenity, streetscene or the listed buildings in the wider locale – that is a very successful outcome.

Great consideration has been given to ensure the proposal is well sited to minimise impact upon streetscene, residential amenity, visual amenity, heritage assets and pedestrian movement. Great care has been given to set the proposal back on the pavement, and in a commercial area which is less sensitive than some of the surrounding residential areas. The site was selected as it has very minimal overlooking windows from residential property. Where there is overlooking it

is a small number of residences and that view is in the context of commercial backdrops, and other vertical street structures such as lampposts and a 62 metre chimney nearby. At this distance and in this context this will ensure impact upon residential amenity is minimised. This location is the only location in the search area that minimises overlooking in this way. It is also positioned well away from Victoria Park Conservation Area.

We have purposely sited against the backdrop of the commercial area – this provides a context of vertical infrastructure that the proposal can assimilate with.

This proposal should be considered in the context of greater material benefit than previous. It is worth noting that Part 16 of the GPDO is also in consultation to reduce restriction on this type of development and NPPF policy is also in consultation to add even more weight on material benefits for development like this and other development that contribute to a prosperous economy.

The site is also placed well back on the pavement – this ensures that there is no impact on pedestrian flow beyond existing.

Great care has been taken to minimise impact and to ensure that backdrop is maximised to reduce prominence. This is demonstrated by the images below:-

* Red arrow in images below indicate general location of pole.





The proposal is set in a commercial area to have less impact than in the surrounding residential areas.

As seen above, the proposed new pole assimilates into the streetscene along with other vertical structures such as streetlamps and the chimney.

Design

The height of the monopole at 20 metres is the minimum height required to provide high-quality 4G and 5G coverage to the intended target area. If the mast height were any lower, it would not be able to provide sufficient coverage to the target coverage area due to radio propagation constraints and signals being blocked by surrounding 'clutter' in the form of tall buildings and trees.

Modern 5GSA service is provided via higher frequency radio spectrum. This is helpful in that it can deliver low latency, high speed and high capacity data transfer required to service modern applications, sensors and devices. However, this spectrum does not propagate as far nor propagate through materials (like trees or buildings) as well as lower frequency spectrum

utilised by previous generations. This directly impacts and advises the necessary height, design and siting to overcome that constraint.

As a result, 5G requires taller structures to achieve the same level of coverage footprint. Additionally, this location is nearby to commercial backdrops, large advertising hoardings and other vertical street structures such as an existing pole on Salop Street and lampposts. These are incredibly helpful from the perspective of minimising visual impact by creating a highly developed, vertical, urban context that the pole will assimilate and not appear out of scale with but we must ensure there is sufficient height to make the proposal viable technically.

It is felt that this pole type design is the most sensitive that could be used. It is necessary to have this type of design that would be structurally capable of hosting the antennas at the necessary height while also being the most slimline pole possible.

The use of this pole, capable of supporting antennas at this height to maximise radio propagation and, subsequently the coverage footprint, reduces the need for additional masts in the surrounding area that may have been required if the antennas were at a lower height. The height also ensures ICNIRP compliance and so this 20m height is the lowest height that is viable.

The mast is proposed light grey (RAL 7035) colour – this was intentional to minimise contrast against the dense urban backdrop it is sited against while it will also blend at height with what is typically a grey sky backdrop.

The antennas have been placed in a very narrow aperture in a stacked format (5G antennas at the top and 4G antennas below) to negate bulk and width to keep the width as streamlined and slimline as possible. GRP shrouding of antennas cannot be used on modern deployments as it obstructs 5G frequency propagation and also acts as a sail, with the greater surface area catching the wind, putting significantly more structural pressure on the pole from wind loading. Below the antennas are remote radio units required to maintain high quality service – these must be adjacent to the antennas as increased feeder length causes signal degradation. Between the antenna and remote radio apertures there is banding to merge the apertures and keep it appearing streamlined, unfussy and uncluttered.

There are cabinets/equipment housing at the base – these share a foundation and are tightly packed beside each other – this is done to minimise impact by negating a sprawl of cabinets in the streetscene. The are also very narrow to minimise streetscene impact. The cabinets are of fir green (RAL 6009) colour as it helps assimilate with existing and this typically blends with soft landscaping in the area.

It was felt that a pole would be suitable in this urban setting given tall pole lighting columns and existing street furniture are a common feature and so this setting would be suited to a pole.

These efforts to minimise contrast at the various heights is advocated at Paras 28 & 40 of the Government Code of Practice...

"Mitigating visual impacts: when possible, operators should look to use sympathetic designs, materials and colour (including camouflage where appropriate) to ***minimise the contrast between infrastructure and the area****."*

"Colouring and camouflage: where appropriate, ***masts should be coloured to match their backdrop to minimise contrast*** *in an urban or rural setting."*

The use of this pole, capable of supporting antennas at this height to maximise radio propagation and, subsequently the coverage footprint, reduces the need for additional masts in the surrounding area that may have been required if the antennas were at a lower height.

For all these reasons, the streetworks pole design is the most suitable design in this particular circumstance.

Any properties in the area, including the residences at Carmoor Road, are heavily screened by the other vertical street structures and tall buildings. With the amount of intervening development and highly urbanised context the proposal will have minimal impact of visual amenity and no significant impact upon residential amenity.

Significantly, through careful siting, this is the only technically viable location in the search area that can ensure such minimal levels of impact upon visual, residential amenity, streetscene (visually and in terms of pedestrian obstruction) and heritage assets.

The improved digital connectivity also aligns with the Government's Wireless infrastructure Strategy, Planning and Infrastructure Bill, 10 Year Infrastructure Strategy and the NPPF, all of which promote digital connectivity infrastructure given the significant social and economic benefits it delivers locally, regionally and nationally.

The principal aim of the development is to enhance VMO2's mobile broadband network coverage and capacity. Businesses, commuters, workers, visitors and residents all depend upon high quality network service to facilitate use of data-hungry applications on their phones and other devices, especially in urban centers and transport hubs. These applications carry significant socio-economic benefit, all underpinned by the connectivity provided by infrastructure such as the proposal.

Enclose map showing the cell centre and adjoining cells:

VMO2's ongoing network improvement programme in line with Government aspirations.

This area requires additional capacity to handle the volume of data traffic accessing the network via devices and phones.

Currently, VM02 customers have limited coverage and capacity in this area. Network 'capacity' is an increasing challenge in densely populated urban areas where there is exponential growth in demand for data services to facilitate data hungry applications and devices. While 'coverage'

may be present, the network has insufficient 'capacity' to handle the volume of user traffic and so calls are dropped and data based applications continuously buffer without being usable.

This is demonstrated by the crowdsourced network performance data shown below. Red obviously demarks poor capacity and network performance while green is quality performance.

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Type of Structure	
Description: The proposed development comprises the installation of a new 20m high Orion streetpole hosting 6 no. antennas, 3 no. ERS, 2 no. dishes, equipment housing and other ancillary development. The installation has been designed to support both 4G and 5G technologies. For full technical specifications and layout, please refer to the enclosed drawing package.	
Overall Height:	+20m 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:	Pole painted Light Grey (RAL 7035) with grey antennas.
Equipment housing – type of material and external colour:	Steel equipment cabinets painted fir green (RAL 6009).

Reasons for choice of design:

This is discussed at length in the previous section of this document – to negate unnecessary duplication this will not be repeated but please reference the detail discussed previously.

The NPPF and Code of Practice encourages site sharing and the efficient use of existing telecommunications infrastructure. However, within the defined search area, there are no existing base stations that are capable of being shared to provide this new service.

Policy also advocates the use of buildings where possible. None of the rooftops in this search area were suitable and this is addressed in the sequential test and discounted options below.

The latest 5G service is delivered via higher frequency radio. This higher frequency is fantastic in that it can deliver high speed data services required for modern applications, however, it has the negative in that higher frequency does not propagate as far as lower frequencies used in previous generations, nor do the radio waves propagate through 'clutter' as well meaning that signal is blocked easily. ICNIRP exclusion zone is also typically larger. This necessitates antennas to be hosted higher to ensure ICNIRP compliance, so the radio frequency can propagate as far as is possible to maximise coverage footprint and so that there is line of sight above 'clutter' that would block the signal propagation.

All in all it is felt that that this proposed design strikes the best balance in terms of technical necessity to overcome technical constraints and minimising visual impact by keeping the height to an operational minimum, clearing surrounding clutter to assist radio propagation (which negates the need for additional sites in the area to pick up the shortfall if the antennas are low, which would be contrary to NPPF policy in terms of keeping numbers to a minimum) while being structurally secure, providing height so antennas can be of the necessary height for ICNIRP compliance and by utilising a colour finish (Grey) that will minimise contrast when viewed against the urban backdrop while leaving antennas grey so that they also blend with what is typically a grey sky backdrop which it will be typically seen against.

In summary, this proposal represents the most efficient, least visually intrusive solution for delivering critical 4G improvements and new 5G coverage. It reflects a carefully considered approach to site selection, design, and environmental integration, and responds appropriately to both national planning guidance and the Operator's legal obligations to provide robust, modern communications infrastructure.

The technical constraints that dictate and inform this siting and design are discussed at length throughout Governments 'Code of Practice for Wireless Network Development in England' Planning Guidance document (attached to this application).

4. Technical Information

ICNIRP Declaration attached ICNIRP public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or	**Yes**	

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.		

5. Technical Justification

Reason(s) why site required
In the UK, mobile network operators (MNOs) such as EE, VodafoneThree and VMO2 operate under a regulatory framework primarily controlled by Ofcom on behalf of UK Government. Their obligations arise from two main legal mechanisms: ○ Wireless Telegraphy Act spectrum licences (for use of radio frequencies). ○ General Conditions of Entitlement under the Communications Act 2003 (for provision of electronic communications networks/services). Through the Spectrum Licence Obligations (Wireless Telegraphy Act 2006) mobile operators require licences from Ofcom to use radio spectrum, which is essential for operating mobile networks. Key obligations typically include the use of allocated spectrum that must be used within specific frequency bands, power limits, emission standards and interference controls. These conditions ensure efficient spectrum use and prevent interference. These radio spectrums are governed by the laws of physics but one spectrum/frequency will have different principles to another. Each Network Operator is licenced to use different spectrum and this is why what may be suitable siting for one operator may not be suitable for another. This directly influences potential siting opportunities for masts. Perhaps most significantly, these licences are issued with coverage and network performance obligations. This will include things like roll-out or coverage requirements, minimum population coverage or geographic coverage requirements for rural areas. Obligations linked to specific technologies or generations like 5G. Operators must be provide data to Ofcom on network performance and demonstrate compliance with coverage and network performance milestones to demonstrate they have met their licence obligations. Additionally, under the General Conditions of Entitlement (Communications Regulation) any operator providing public electronic communications networks or services must comply with Ofcom's General Conditions. This means that, amongst other things, an Operator must enable and maintain network integrity and resilience, and ensure access to emergency services.

If an Operator does not comply with these requirements then Ofcom, on behalf of UK Government, can issue substantial fines, withdraw spectrum or even cancel an Operators licence.

This is relevant to the proposal because...

1. The spectrum allocated, and the physics associated, directly impacts the siting options for the Operators.

2. The Operators must find a means of providing this service locally through the siting of a mast. While Operators will obviously want to provide the best service they can to their Customers, it goes beyond this in there is an actual legal obligation to provide this area with the most up to date 5G service with sufficient coverage and capacity to deliver quality network performance.

The NPPF then requires that operators find the least impactful means of providing that service, minimising the impact while acknowledging the technical constraints. The proposal is permitted development (albeit 'with prior approval') so the principle of the development is established in law via Part 16 of the GPDO. This is an important distinction as under permitted development a solution must be found as consideration cannot be given to the principle, only that the proposal is the most suitable option in terms of siting and appearance.

Under the terms of its licence with UK Government (controlled via Ofcom on Governments behalf), Virgin Media O2 Limited (VMO2) are required to meet strict service obligations, ensuring that the benefits of mobile connectivity are extended to all communities, including those currently underserved.

This installation is required to provide improved 4G coverage and brand new 5G coverage for VM02 on Upper Brook Street addressing existing gaps in service, additional capacity and improving overall network performance in the locality.

This area of Manchester has limited VM02 5G coverage with poor network performance and, as alluded to previously, requires an additional site to deliver improved service and extra network capacity.

Mobile base stations operate by transmitting radio signals that connect mobile devices to the wider network, allowing users to make calls, send texts, stream content, and access data services. These base stations are linked together—via fibre or wireless links—to form an interconnected network. Each base station serves a defined area known as a cell, and these cells overlap with adjacent ones to create seamless coverage. The size and shape of each cell can vary depending on local conditions, such as topography, building density, and user demand.

As low-powered radio transmitters, base stations have a limited effective range and must be located within or close to the areas they are designed to serve. Proposing this installation too far from the intended coverage area will leave parts of the target service area without essential mobile

services. For this reason, the proposed location has been carefully selected to ensure the required coverage objectives can be achieved efficiently and effectively.

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

Discounted Options

In seeking to meet growing network demand in the Upper Brook Street area, the Operator's acquisition and survey agents have made every effort to identify a site that minimises any potential impact on the character of the area. However, in order to effectively deliver improved mobile services, it is essential that the communications site is located as close as possible to the area of customer demand.

In line with the sequential site selection process outlined in best practice guidance, the following criteria were followed when identifying a suitable location:

a) *Mast and Site Sharing*
b) *Use of Existing Buildings or Structures*
c) *New Ground-Based Installation*

As required by the Operator's licence and consistent with national planning guidance, the first preference was to utilise existing telecommunications infrastructure where it represented the most environmentally sensitive solution. The Ofcom Site Finder register was consulted to identify potential mast-sharing opportunities.

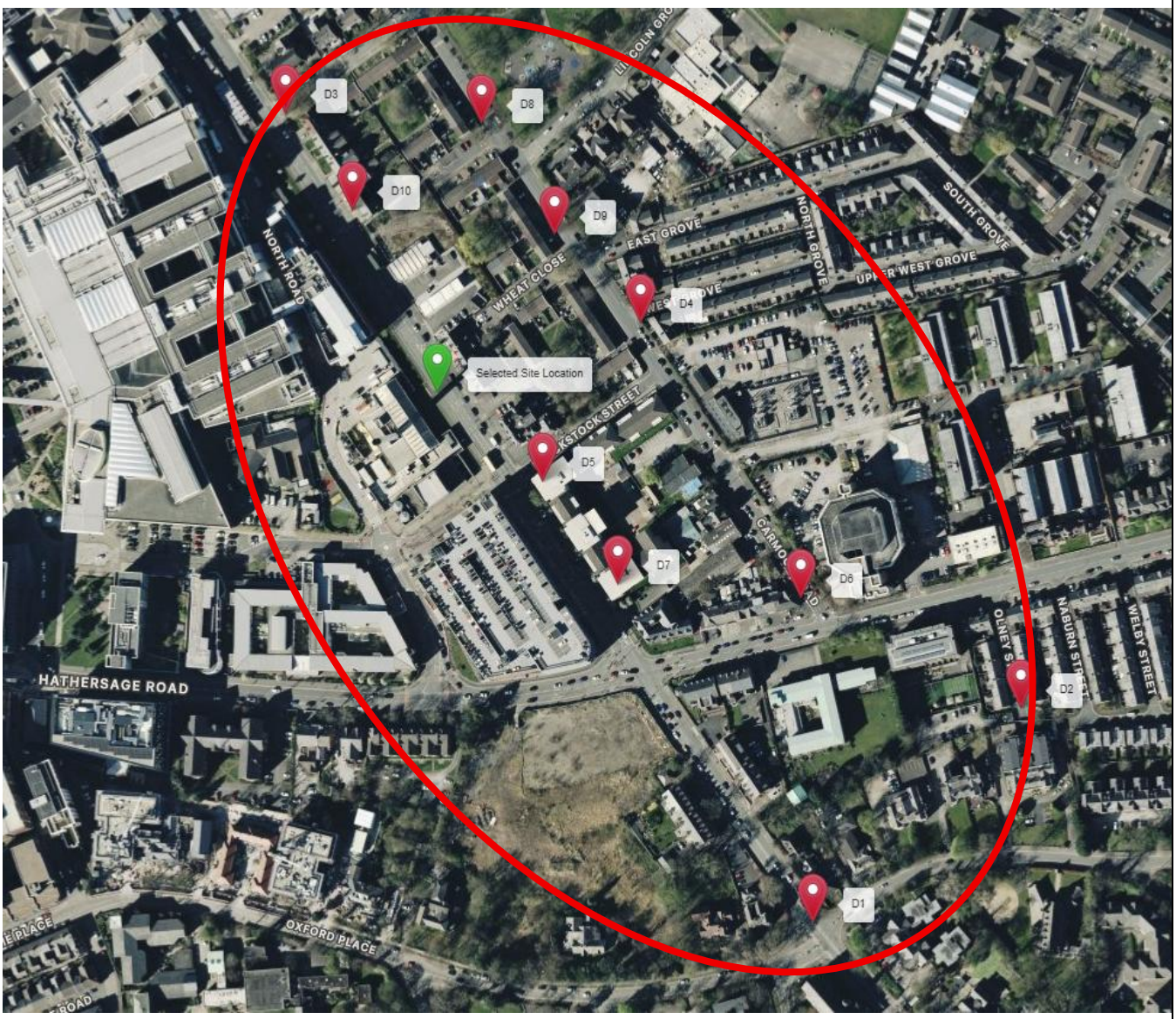
As no other suitable existing telecommunications sites were identified that could accommodate the extent of equipment required for this proposal, a new installation is required. There are no existing buildings that can be used due to procedural issues.

The local urban environment presented further constraints. Underground services litter the area underground that we cannot site on top of. These are all unsuitable for installations for visual amenity reasons.

The proposal negates these potential impacts and so is the best, technically viable, option in the area. With this it complies with planning policy and guidance in terms of minimising visual impact.

A detailed list of alternative sites considered is provided below, with reasons for their exclusion in favour of the proposed site.

The search area is quite small as 5G doesn't travel far and we must be close to the site we are coming off.



Site	Address	NGR	Reason for discounting
D1 - Streetworks	3A, Anson Road, Victoria Park, Rusholme, Manchester, Greater Manchester, England, M14 5BY, United Kingdom	E: 385581 N: 395709	This site was discounted due to its location within the Victoria Park Conservation Area, a designated heritage asset characterised by its historic townscape, mature landscaping and architectural significance. The introduction of new telecommunications infrastructure in this location would have the potential to result in a more pronounced visual impact on the character and appearance of the Conservation Area, particularly given the sensitivity of the historic environment and the requirement to preserve or enhance its significance.

			In comparison to the preferred site, the Conservation Area location would be more susceptible to heritage-related concerns and would be likely to attract greater scrutiny in relation to its effect on designated heritage assets and important views within the area. The presence of historic buildings, established landscape features and a more sensitive townscape context reduces the capacity of the site to accommodate modern telecommunications infrastructure without creating visual harm. Consequently, the site was discounted in favour of the preferred option, which is located outside the Conservation Area and is considered to offer a more appropriate and less sensitive setting for the proposed development, thereby reducing potential impacts on heritage significance and local character.
D2 - Streetworks	13, Olney Street, Victoria Park, Rusholme, Manchester, Greater Manchester, England, M13 0EN, United Kingdom	E: 385705 N: 395832	This site was discounted due to its position directly outside Buckingham Crescent, a designated heritage asset of special architectural and historic interest. Owing to its immediate proximity, any telecommunications installation at this location would form a prominent feature within the setting of the Listed Building and would have an increased potential to affect how the asset is experienced and appreciated. The introduction of a modern telecommunications structure in such close proximity would create a more noticeable visual juxtaposition with the historic character of the Listed Building and could detract from the architectural qualities that contribute to its significance. Given the importance attached to preserving the setting of designated heritage assets, this location is considered particularly sensitive to new vertical infrastructure. In comparison, the preferred site is located further from designated heritage assets and benefits from a less constrained townscape context, reducing the potential for impacts on heritage significance and visual amenity. The preferred site is therefore considered to represent a more appropriate and less sensitive location for the proposed development, and this option has been discounted accordingly.
D3 - Streetworks	34, Swinton Grove,	E: 385268	This site was discounted due to its position directly outside Holy Trinity Armenian Apostolic Church and

	Victoria Park, Chorlton-on-Medlock, Manchester, Greater Manchester, England, M13 0EU, United Kingdom	N: 396174	Vicarage, a designated heritage asset of special architectural and historic interest. Owing to its immediate proximity, any telecommunications installation at this location would form a prominent feature within the setting of the Listed Building and would have an increased potential to affect how the asset is experienced and appreciated. The introduction of a modern telecommunications structure in such close proximity would create a more noticeable visual juxtaposition with the historic character of the Listed Building and could detract from the architectural qualities that contribute to its significance. Given the importance attached to preserving the setting of designated heritage assets, this location is considered particularly sensitive to new vertical infrastructure. In comparison, the preferred site is located further from designated heritage assets and benefits from a less constrained townscape context, reducing the potential for impacts on heritage significance and visual amenity. The preferred site is therefore considered to represent a more appropriate and less sensitive location for the proposed development, and this option has been discounted accordingly.
D4 – Streetworks	45, Carmoor Road, Victoria Park, Chorlton-on-Medlock, Manchester, Greater Manchester, England, M13 0EA, United Kingdom	E: 385479 N: 396053	This site was discounted due to its location within a predominantly residential area. In contrast to the preferred site, which is situated within a commercial setting where a greater variety of infrastructure, street furniture and built development is already present, the residential environment is inherently more sensitive to the introduction of new telecommunications apparatus. The proposed infrastructure would be experienced in closer proximity to residential properties and private amenity areas, increasing its perceived visual prominence within the streetscene. The predominantly domestic character of the area, together with the expectation of a less cluttered environment, would reduce the ability of the development to assimilate into its surroundings when compared with the preferred commercial location.

			Furthermore, the siting of telecommunications equipment within a residential setting has the potential to give rise to greater concerns regarding visual amenity due to the increased number of nearby receptors and the frequency with which the infrastructure would be viewed by residents. By comparison, the preferred site benefits from a more commercial character where such infrastructure is more readily associated with the existing townscape and can be accommodated with less impact on local character and appearance. Accordingly, this option was discounted in favour of the preferred site, which is considered to provide a more suitable and less sensitive location for the proposed development.	
D5 - Rooftop	Brook Hall, 281, Upper Brook Street, Victoria Park, Chorlton-on-Medlock, Manchester, Greater Manchester, England, M13 0FZ, United Kingdom	E: 385420 N: 395962	This site was discounted as it is located on a building that falls within the scope of the Building Safety Act 2022. The additional regulatory requirements associated with higher-risk buildings introduce significant constraints to the delivery of telecommunications infrastructure, including the need for enhanced approvals, engagement with the accountable person and compliance with the building's safety management arrangements. Whilst rooftop installations can often represent an effective means of providing telecommunications coverage, the legislative and procedural requirements applicable to buildings subject to the Building Safety Act can create uncertainty regarding programme timescales and overall deliverability. Access arrangements, structural assessments, fire safety considerations and the review processes required by the building's management and safety regime can all increase the complexity of securing and implementing a suitable solution. In comparison, the preferred site is not subject to the same level of regulatory constraint and therefore presents a more deliverable option within the required deployment timescales. The preferred location offers greater certainty in terms of site acquisition, design development and construction, whilst still meeting the operational coverage objectives of the network.	

			Accordingly, this option was discounted due to the additional delivery risks and programme uncertainty associated with development on a building subject to the Building Safety Act 2022, making it a less suitable alternative than the preferred site.
D6 - Streetworks	60, Hathersage Road, Victoria Park, Rusholme, Manchester, Greater Manchester, England, M13 0FN, United Kingdom	E: 385574 N: 395895	This site was discounted due to the physical constraints associated with the available footway width and the presence of underground services. The footpath at this location is notably narrower than that available at the preferred site, resulting in limited space to accommodate telecommunications infrastructure whilst maintaining an appropriate pedestrian environment. In addition, evidence of existing underground apparatus and utility services within the highway corridor would significantly constrain the siting of any new installation. The presence of buried services reduces the available area for foundations and increases the potential for conflicts with existing infrastructure, potentially requiring costly diversions or resulting in an inability to achieve the necessary engineering clearances. The combination of a restricted footway width and underground utility constraints would also increase the visual and functional impact of the development within the streetscene, as the apparatus would occupy a greater proportion of the available pedestrian space and appear more prominent within the public realm. By comparison, the preferred site benefits from a wider footway and fewer apparent underground constraints, providing greater flexibility for the positioning of equipment and allowing the development to be accommodated without adversely affecting pedestrian movement or creating unnecessary conflicts with existing utility infrastructure. Accordingly, this option was discounted as it presents both engineering and public realm constraints that make it a less suitable and less deliverable solution than the preferred site.
D7 - Rooftop	Brook Hall, 281, Upper	E: 385465	This site was discounted as it is located on a building that falls within the scope of the Building Safety Act

	Brook Street, Victoria Park, Chorlton-on-Medlock, Manchester, Greater Manchester, England, M13 0FZ, United Kingdom	N: 395903	2022. The additional regulatory requirements associated with higher-risk buildings introduce significant constraints to the delivery of telecommunications infrastructure, including the need for enhanced approvals, engagement with the accountable person and compliance with the building's safety management arrangements. Whilst rooftop installations can often represent an effective means of providing telecommunications coverage, the legislative and procedural requirements applicable to buildings subject to the Building Safety Act can create uncertainty regarding programme timescales and overall deliverability. Access arrangements, structural assessments, fire safety considerations and the review processes required by the building's management and safety regime can all increase the complexity of securing and implementing a suitable solution. In comparison, the preferred site is not subject to the same level of regulatory constraint and therefore presents a more deliverable option within the required deployment timescales. The preferred location offers greater certainty in terms of site acquisition, design development and construction, whilst still meeting the operational coverage objectives of the network. Accordingly, this option was discounted due to the additional delivery risks and programme uncertainty associated with development on a building subject to the Building Safety Act 2022, making it a less suitable alternative than the preferred site.
D8 - Streetworks	14, Carmoor Road, Victoria Park, Chorlton-on-Medlock, Manchester, Greater Manchester, England, M13 0DY, United Kingdom	E: 385385 N: 396168	This site was discounted due to its location within a predominantly residential area. In contrast to the preferred site, which is situated within a commercial setting where a greater variety of infrastructure, street furniture and built development is already present, the residential environment is inherently more sensitive to the introduction of new telecommunications apparatus. The proposed infrastructure would be experienced in closer proximity to residential properties and private amenity areas, increasing its perceived visual prominence within the streetscene. The

			predominantly domestic character of the area, together with the expectation of a less cluttered environment, would reduce the ability of the development to assimilate into its surroundings when compared with the preferred commercial location. Furthermore, the siting of telecommunications equipment within a residential setting has the potential to give rise to greater concerns regarding visual amenity due to the increased number of nearby receptors and the frequency with which the infrastructure would be viewed by residents. By comparison, the preferred site benefits from a more commercial character where such infrastructure is more readily associated with the existing townscape and can be accommodated with less impact on local character and appearance. Accordingly, this option was discounted in favour of the preferred site, which is considered to provide a more suitable and less sensitive location for the proposed development.
D9 - Streetworks	26, Carmoor Road, Victoria Park, Chorlton-on-Medlock, Manchester, Greater Manchester, England, M13 0DY, United Kingdom	E: 385428 N: 396104	This site was discounted due to its location within a predominantly residential area. In contrast to the preferred site, which is situated within a commercial setting where a greater variety of infrastructure, street furniture and built development is already present, the residential environment is inherently more sensitive to the introduction of new telecommunications apparatus. The proposed infrastructure would be experienced in closer proximity to residential properties and private amenity areas, increasing its perceived visual prominence within the streetscene. The predominantly domestic character of the area, together with the expectation of a less cluttered environment, would reduce the ability of the development to assimilate into its surroundings when compared with the preferred commercial location. Furthermore, the siting of telecommunications equipment within a residential setting has the potential to give rise to greater concerns regarding visual amenity due to the increased number of

			nearby receptors and the frequency with which the infrastructure would be viewed by residents. By comparison, the preferred site benefits from a more commercial character where such infrastructure is more readily associated with the existing townscape and can be accommodated with less impact on local character and appearance. Accordingly, this option was discounted in favour of the preferred site, which is considered to provide a more suitable and less sensitive location for the proposed development.
D10 - Streetworks	245, Upper Brook Street, Victoria Park, Chorlton-on-Medlock, Manchester, Greater Manchester, England, M13 0HL, United Kingdom	E: 385308 N: 396119	This site was discounted due to its location within a predominantly residential area. In contrast to the preferred site, which is situated within a commercial setting where a greater variety of infrastructure, street furniture and built development is already present, the residential environment is inherently more sensitive to the introduction of new telecommunications apparatus. The proposed infrastructure would be experienced in closer proximity to residential properties and private amenity areas, increasing its perceived visual prominence within the streetscene. The predominantly domestic character of the area, together with the expectation of a less cluttered environment, would reduce the ability of the development to assimilate into its surroundings when compared with the preferred commercial location. Furthermore, the siting of telecommunications equipment within a residential setting has the potential to give rise to greater concerns regarding visual amenity due to the increased number of nearby receptors and the frequency with which the infrastructure would be viewed by residents. By comparison, the preferred site benefits from a more commercial character where such infrastructure is more readily associated with the existing townscape and can be accommodated with less impact on local character and appearance. Accordingly, this option was discounted in favour of the preferred site, which is considered to provide a

			more suitable and less sensitive location for the proposed development.

If no alternative site options have been investigated, please explain why:

N/A

7. Additional Relevant Information

Environmental information:

This proposal is not sited within any environmental designations.

Land use planning designations:

The site is located in the settlement limit.

There are no other relevant designations.

Additional relevant information (include planning policy and material considerations):

From the outset, it is important to acknowledge that any alteration to the landscape (regardless of its function as telecommunications infrastructure) will inevitably be noticeable to nearby residents and frequent passers-by. However, visibility alone, or the siting and appearance of a development, does not inherently equate to significant or unacceptable harm.

When assessing the suitability of telecommunications development proposals, it is essential that decision-makers prioritise telecommunications-specific planning policy where such policy exists and balances the need and socio-economic benefits against perceived, or identified, harm.

In the absence of up-to-date or locally relevant guidance, the provisions of the NPPF must take precedence. It is also important to recognise that it would be unreasonable to expect specialised infrastructure, such as telecommunications equipment, to fully conform to general planning policy criteria that are not tailored to its unique requirements.

Legislation

The proposal constitutes permitted development with prior approval.

This means that the proposal is deemed acceptable in principle via Part 16 of the GPDO. As such, the principle of the development is not in question – just an assessment on the acceptability of the proposal in terms of siting and appearance.

The Local Development plan can be given limited weight in the determination of an application for prior approval – it is certainly not a determinable factor.

The development plan does not have the statutory primacy it has for full planning applications. Relevant development plan policies can be material considerations, but they do not bind the decision maker and cannot be determinative - this proposal is actually permitted development where the principle of the development is accepted in law (even in designations such as public open space or green belt).

Local Policy

The adopted Manchester development plan framework, including the 2024 adopted Places for Everyone and supporting local planning policies, promotes the delivery of modern digital and telecommunications infrastructure as an important component of sustainable economic growth, connectivity and urban regeneration. The planning framework recognises that high-quality digital infrastructure is essential to support businesses, residents, educational institutions and emerging employment sectors, particularly within key growth corridors and areas of regeneration.

Planning policy generally supports telecommunications development where it:

- Improves digital connectivity and network coverage;
- Supports economic growth and investment;
- Is appropriately sited and designed to minimise visual impact;
- Makes use of existing urban infrastructure and developed land where possible;
- Avoids unacceptable impacts on visual amenity, heritage assets and public safety; and
- Integrates effectively within the existing character of the surrounding area.

Manchester's wider digital and regeneration strategies also identify the importance of expanding advanced communications infrastructure to support the city's role as a leading digital and innovation centre, with particular emphasis on major employment and growth corridors.

The proposed streetworks pole on Upper Brook Street accords with the objectives of the adopted planning framework due to its location within a well-established commercial and mixed-use corridor characterised by significant existing infrastructure, transport activity and urban development. Upper Brook Street forms part of a major route into Manchester and contains a variety of street furniture, lighting columns, signage, commercial premises and modern development, creating a visually active streetscape capable of accommodating telecommunications infrastructure without appearing incongruous.

The commercial character of the area provides a more robust townscape context than a predominantly residential environment, reducing the sensitivity of the location to additional infrastructure. The proposal would be viewed alongside existing highway and utility features and would therefore integrate with the established streetscene whilst supporting enhanced digital connectivity within an important growth and regeneration corridor.

Furthermore, the proposal would contribute towards the continued improvement of telecommunications coverage and network capacity in accordance with local and strategic objectives to strengthen Manchester's digital infrastructure and support economic activity. Given the developed commercial context, the absence of significant harm to the character of the area, and the operational need for enhanced connectivity, the proposed streetworks pole is considered to align with the aims of the adopted planning policy framework relating to telecommunications and digital infrastructure.

Policy JP-C1 'An integrated Network of the Joint Development Plan' states:

"In order to help deliver an accessible, low carbon Greater Manchester with world-class connectivity, ***we will support a range of measures, including****:*

2. Enabling ***the provision of high quality digital infrastructure****;"*

It continues at **paragraph 10.29**...

"Digital connections are increasingly important to every aspect of our lives, from socialising and shopping to learning, business and accessing essential services. They enable us to connect to people on the other side of the world as easily as on the same street. As these connections open up a range of opportunities it is important everyone can access them so that they can fully participate in society and our economy.

Any truly global city will need to have widespread, affordable, reliable, secure and future-proofed digital infrastructure *that provides a competitive edge for businesses and supports high-levels of social inclusion.* ***This will be essential to capitalise on new innovations, such as artificial intelligence, the Internet of Things and connected and autonomous vehicles. Big data will also enable the city-region to be managed more effectively. By facilitating more home-working, good digital infrastructure can also help reduce the need for travel and therefore help reduce carbon emissions, traffic congestion and air pollution****."*

"In order to achieve its ambition to be the UK's leading digital city and in the top five in Europe it is ***fundamental for all parts of the city-region to have access to world-class digital connections at an affordable price****. The Plan area already has a vibrant digital economy, with particular strengths in key economic sectors such as the creative industries, health innovation, and advanced manufacturing and materials."*

"Improving digital infrastructure and ensuring that new development is connected to it is therefore a high priority."

"Recent decades have shown the speed with which digital technology evolves, with a new generation of mobile technology being introduced around every ten years. ***The digital infrastructure will therefore need to adapt and evolve throughout the Plan period****."*

Policy JP-CS: 'Digital Connectivity' looks at this specifically and states:-

"We **support the provision of affordable, high quality, digital infrastructure**.

In making decisions **we will support a range of measures**, including:

1. **Enabling the roll-out of latest generation mobile technology** and full fibre to the premises connectivity, in a way that **maximises coverage whilst protecting townscape quality** and **ensuring an ability to respond to updated/changing technology**;"

This provides significant support for, and subsequent weight attached to, the material socio-economic benefits of digital connectivity infrastructure.

This policy specifically discusses how digital technology quickly evolves and the requirement that the member Boroughs 'ensure an ability to respond to updated/changing technology'. This is relevant due to the new equipment and coverage supplied through this proposal.

As discussed throughout this Statement, the constraints around that new technology dictate and necessitate the siting and design requirements for the new infrastructure and that is very much relevant to this proposal.

The policy is also clear that coverage should be 'maximised whilst protecting townscape quality'. This is significant as it is felt that the proposal wholly complies with this policy requirement and that has been demonstrated in this through a robust sequential site selection process to identify the best, viable and least impactful location.

This moves the proposal into a more commercial area that is well screened. That safeguards the wider townscape and negates the need to site within the surrounding residential area. The design also assists with this policy compliance – a streetworks pole that can provide the necessary structural capability to provide all the necessary service from a single site – minimising the number of sites required and therefore reducing proliferation and impact on townscape by providing all the required connectivity from a discrete location.

With all this considered the proposal wholly complies with the relevant local planning policy.

On review it is clear that the proposal meets all local policy requirements and this siting and design is well justified against policy and is certainly the most appropriate, least impactful, viable proposal.

Regional Policy and Strategy – Greater Manchester Combined Authority

World class Digital connectivity is a major strategic aim the Greater Manchester Combined Authority and the GMCA have numerous strategic documents that add significant evidential

weight to the material socio-economic benefits of mobile connectivity and the necessary infrastructure to provide it.

One of the 7 'Connected Workstreams' of the **'Greater Manchester Strategy 2025-35'** is Digitally Connected Places and People'.

This states:-

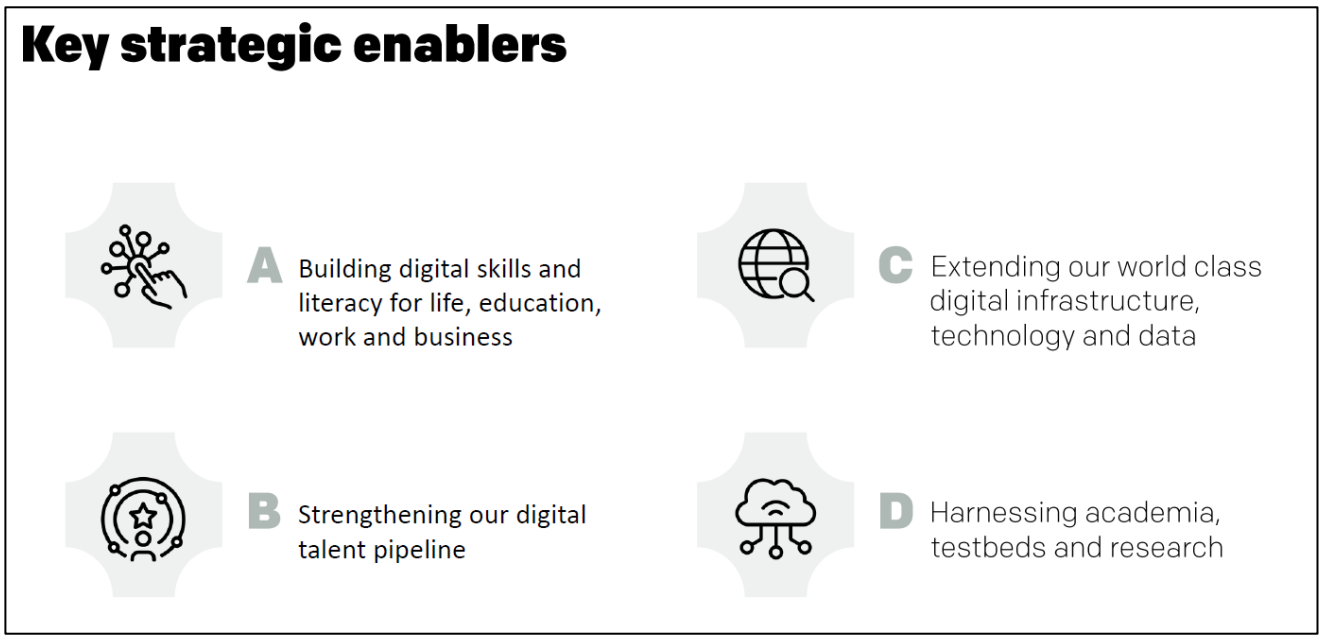
*"It's **essential** that everyone in our city region can thrive in the digital age – a new industrial revolution powered by artificial intelligence."*

The need for digital connectivity, provided by infrastructure like the proposal, is discussed consistently throughout this document as something that underpins all strategic aspirations of the city region.

Additionally, the **'Greater Manchester Digital Blueprint 2023-26'** adds further weight and context....

*"Ensure we have **world class digital infrastructure that stimulates economic growth** and enables the development of our growth zones, across sectors and localities."*

Extending the digital infrastructure such as the proposal is also noted as a 'Key Strategic Enabler':-



Finally, the '**Greater Manchester Industrial Strategy, June 2019'** adds additional support and context for the need for 5G enabling digital infrastructure as something that underpins the city regions wider economic aspirations. This aspiration is noted:-

"A top five city-region for the digital economy in Europe, with full fibre broadband and **5G coverage**, and with internationally-significant media and cyber-security clusters."

"The city-region now aims **to upgrade, integrate and future-proof its infrastructure, to create a 21st century city-region with extreme digital connectivity**, clean and inclusive growth and – through work with others – improved access to national and global markets."

*"Continue **transforming the digital connectivity of the city region to drive economic growth** and innovation, working with government to meet national targets of nationwide full fibre coverage by 2033 and **full roll-out of 5G technologies for most people by 2027**."*

There is clearly extensive weight of support for infrastruture like the proposal. This proposal is part of a network that wholly underpins these wider strategic and economic aspirations of both Manchester City Council and Greater Manchester.

Without infrastructure like the proposal those aspirations cannot be met and it is significant that no specific area is depreived of this while the rest of the city region benefits, creating a digital divide that will impact the locality.

This is particularly relevant to the proposal given it will provide network capacity to the nearby University and residential areas. This situation, in the context of those strategic documents and regional aspirations, weigh heavily in favour of the proposal.

National Digital Strategy, Planning Policy and Guidance:-

Code of Practice for Wireless Network Development in England
In March 2022 UK Government published their 'Code of Practice for Wireless Network Development in England' Planning Guidance document.

The document notes that...

*"The aim of the Code of Practice is to **support the government's objective of delivering high quality wireless infrastructure** whilst balancing these needs with environmental considerations. It also has an important role in making sure that appropriate engagement takes place with local communities and other interested parties"*

This guidance document is clear that...

*"Digital connectivity is **vital to enable people to stay connected and businesses to grow. Fast, reliable digital connectivity can deliver economic, social and well-being benefits** for the whole of the UK.*

*As the demand for mobile data in the United Kingdom is increasing rapidly, it is important that **everyone has access to dependable and consistent mobile coverage** where they live, work and travel."*

The document clearly establishes the material socio-economic benefits of digital connectivity. However, from a really practical perspective, is also really useful in outlining the technical constraints associated with mobile infrastructure that dictate siting and design.

This application has gone into detail on the siting and design rationale of this proposal and this wholly aligns with the principles established within the Government guidance document. These technical constraints, and the solutions necessary to overcome them, are material considerations that should be given weight in favour of the proposal in any determination.

Paras 28 and 40 discuss how proposals should minimise impact through good design and utilise colours that minimise and reduce contrast – this is wholly the case here with the colouring of the mast – grey pole as it will be viewed against a streetscape and mostly grey skies and grey antennas as they must clear buildings for radio propagation and will be seen against a typically grey sky.

All of these matters wholly align with the proposal. As such, the proposal wholly aligns with the Planning guidance for England provided by UK Government.

NPPF

First published in 2012 but updated as recently as December 2024 with a Government consultation just concluded, the NPPF is the central planning policy document for England. It sets out the government's expectations for how planning decisions should be made and how development should be delivered.

The golden thread of the NPPF is a presumption in favour of sustainable development.

Chapter 10 'Supporting High Quality Communications' sets out the main policy tests for telecoms proposals. It 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)."*

"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."*

The policy also notes that when applying for a new mast evidence should be provided to show how the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure.

Again, the proposal wholly aligns with the policy tests required in the NPPF. It is significant to note the policy test specifically and purposefully notes 'consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion' – this is an acknowledgement of the technical constraints associated that directly influence siting and design (also noted in the Code of Practice Guidance) and gives clear indication and direction that weight must be applied to those operational matters.

The policy concluded that sites should be designed sympathetically – it is been demonstrated throughout the document that through considered siting and design impact has been minimised – siting well back on the pavement, and in a commercial area which is less sensitive than surrounding residential areas and away from listed buildings. There are also vertical structures such as the tall chimney and lamposts. This is the lowest height that will keep the site viable operationally/technically and a slimline streetworks pole design over an open headframe or lattice as it is structurally capable but more sympathetic to the locality.

Evidence has also been provided of a robust sequential test that explores many numerous siting options, including on buildings and other structures, and clearly concludes that this is the most appropriate and least impactful siting.

With all this is it clear that the proposal wholly aligns with NPPF policy tests and requirements.

Furthermore, beyond Chapter 10, NPPF Chapter 6 'Building a Strong, Competitive Economy' specifically advocates support for Digital Connectivity proposals....

"Planning policies should...

*pay particular regard to facilitating development to meet the needs of a **modern economy**, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, **digital infrastructure**, freight and logistics"*

"Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for:

a) *clusters or networks of knowledge and data-driven, creative or high technology industries; and for new, expanded or upgraded facilities and **infrastructure that are needed to support the growth of these industries** (including data centres and grid connections);*

c) *the expansion or modernisation of other **industries of local, regional or national importance to support economic growth** and resilience."*

This policy goes further in adding great weight to the material benefits of the proposal as a counterbalance to perceived harm.

Mobile connectivity will be vital for the modern economy, connecting people and AI with data centres. Connecting IoT devices in Smart Cities with numerous benefits, including carbon reduction. Mobile infrastructure is clearly the 'infrastructure that is needed to support the growth of these industries'.

Furthermore, this section of this document has gone into great detail in demonstrating how the proposal aligns with local, regional and national digital and economic aspirations – as such it also aligns with the NPPF policy supporting 'industries of local, regional or national importance to support economic growth'.

In short, the proposal wholly aligns with both Chapter 10 and Chapter 6 of the NPPF and that must be given great weight in this determination and Planning Balance assessment.

Other National Strategy and Policy
It is felt that it is unnecessary to quote all the relevant documents but it is appropriate to reference them as they clearly show the intent, rationale and of the Government in relation to development like the proposal...

- Wireless Infrastructure Strategy
- Planning and Infrastructure Bill
- 10 Year Infrastructure Strategy

It is also significant to note that, under commitments made within the 10 Year Infrastructure Strategy a consultation on a review of Part 16 of the GPDO has just been concluded – this is with a view to reduce restrictions on digital connectivity infrastructure to promote its delivery. An NPPF consultation which has also recently concluded is also expected to add even more policy support for digital communications.

Ministerial Statements
Written Ministerial Statement UIN HCWS867: Boosting growth by removing barriers to digital infrastructure deployment, made by the then Minister of State for Data Protection and Telecoms, Sir Chris Bryant (attached to this application) states:-

"Digital infrastructure ***underpins growth right across the economy****, and is also a powerful contributor to the economy in its own right, with the sector worth an estimated £50 billion to the UK.* ***It supports the adoption of new and emerging technologies including Artificial Intelligence*** *and enables citizens to participate in modern life. In an increasingly online world, growth in data consumption and increased* ***demands on the UK's digital infrastructure mean there is an urgent need to support the sector in delivering greater connectivity for local communities and businesses.***

We are committed to the rollout of gigabit-capable broadband and 5G networks, with the ultimate goal of enabling businesses, residents, and institutions to access seamless and reliable connectivity. ***These efforts are essential to building a more competitive, equitable, and digitally connected nation****."*

This clearly articulates Government's commitment to removing planning barriers, accelerating deployment and recognising digital communications infrastructure as critical to economic growth.

Similarly, Statement UIN HCWS1325 by Parliamentary Under-Secretary of State for AI and Online Safety Kanishka Narayan makes clear that:

"Digital connectivity is at the foundation of our economy and society and underpins almost every part of daily life. The strength, security, and resilience of our digital infrastructure matters deeply to people, business and the economy in the UK."

Other Material Considerations – Appeals

It is wholly acknowledged that every proposal must be considered on its own merits and there is no such thing as precedent in Planning.

However, appeal decisions can be material considerations to decisions with similar characteristics and main matters. They are certainly material considerations that can be given significant weight in cases where procedural and principle matters are established.

A dominant procedural and principled feature in appeal decisions is that there is a need for balance and identifying the least impactful option. In many cases harm can be identified but that harm must be balanced against the material benefits, the technical constraints and the lack of a better viable option. When that appropriate Planning Balance occurs, especially in the context of prior approval where the principle of the development is established in law, then proposals are often deemed acceptable, on balance.

While harm associated with this proposal is minimal, significantly, it is clear that great effort and consideration has gone into identifying the technically viable siting and design with the least impact.

In that context some recent, procedural and principle establishing, appeal decisions in the Birmingham City Council area have been referenced below. These procedural and 'in principle' matters are wholly relevant to the proposal:-

APP/P4605/W/25/3359736

"In conclusion, the siting and appearance of the proposed development would appear overly prominent and visually intrusive within the street scape. It would ***therefore result in harm to the character and appearance of the area due to its height and siting****. Additionally, it is for the same reasons that it would result in harm to the living conditions of neighbouring residents regarding outlook."*

"The ***Framework recognises that high quality and reliable communications infrastructure is essential for economic growth and social well-being****. Consequently, it supports the expansion of electronic communications networks, including 5G.*

The appeal scheme would provide coverage in an area which has no effective coverage. The lack of coverage would likely lead to a lack of/or very poor call set up, dropped calls and no capacity leading to no service.

*The **appellant has provided a sequential approach to site selection** in which approximately 32 sites were assessed. Many of the sites have been discounted due to, amongst other things, inadequate pavement widths, the presence of underground services and/or overhead lines, closer proximity to dwellings and/or education facilities, greater visibility due to both a lack of natural screening and/or requirements of a taller mast due to lower typography, proximity to access points, reduction in parking provision and /or visibility splays, as well as practical requirements to ensure no competition between the proposed 5G coverage and existing 3G and 4G cell areas and to achieve International Commission on Non-Ionizing Radiation Protection (ICNIRP) certification. **Various buildings and structures were also considered as part of the sequential approach however these were likewise discounted for practical reasons.***

*Given all of the above, in my judgement, it has **been adequately demonstrated that there are likely to be no other appropriate sites**, including buildings and existing masts, than the appeal site. I therefore **attach significant weight in favour of the appeal as a consequence**.*

*In conclusion, I consider the moderate **harm** the installation would cause to the character and appearance of the surrounding area and living conditions of neighbouring residents regarding outlook would be **outweighed by the benefits** of a high-quality communications network facilitated by the proposed development and **the lack of any more suitable alternative sites to provide this benefit**."*

APP/P4605/W/24/3349032

*"I have found that the proposed development, through its siting and appearance, **would cause harm to the character and appearance of the area** for the reasons given above. The other options that might be available are therefore an important consideration.*

*The **Framework supports the development of a high-quality reliable communications infrastructure as this is deemed to be essential for economic growth and social well-being**. Nonetheless, it requires sites to be kept to a minimum and encourages the reuse and adaptation of existing base stations. Paragraph 122 of the Framework expects evidence to be submitted to justify all applications. For a new mast or base station this includes evidence that the possibility of erecting antennas on an existing building, mast or other structure has been explored.*

*The proposal is required to provide 5G coverage. It has been demonstrated that **the site is within an area with demonstrable need for an additional installation in the vicinity to achieve a full and appropriate level of coverage**. The coverage map has informed the appellant's search area for the new equipment and a sequential approach has been taken. In support of the application and now appeal, the **appellant has undertaken an assessment of 42 alternative sites within the defined search area required to provide coverage for the target area**. This included an assessment of several alternative sites that were identified by the Council.*

***The appellant has supplied a number of reasons as to why these sites should be discounted from the search** including: concerns with upgrading the existing mast nearby, interference between masts, issues with the structural suitability and wind loading requirements of buildings in the search area and the impact the surrounding buildings and topography of the area would*

have upon signal transmissions. Certain sites were also discounted due to concerns with highway safety and the nearby railway line and underground services. Some sites were situated within residential areas or within parks close to trees that were covered by a Tree Preservation Order as well as concerns over the effect of the mast upon the character and appearance of the area which provided reasons to discount them.

Several of the alternative sites were located in the 'most' and 'more' sensitive locations as per the Guide. ***While the site is in a 'more sensitive location', the proposed equipment is required to be sited within the search area and the principal of such equipment is not in dispute****. Taking into* ***consideration the significant constraints identified for the alternative sites****; existing buildings, masts, and other structures have been explored and reasonably discounted. Furthermore, comprehensive, and reliable evidence has been given for discounting other possible ground-based mast sites.*

I conclude that the siting and appearance of the proposed installation ***would cause harm to the character and appearance of the area. However, based on the evidence before me, it is unlikely that there is a more suitable site within the search area that may reasonably be available. Therefore, any identified harm is outweighed by the need for the installation to be sited as proposed, taking into account the suitable alternatives****."*

APP/P4605/W/24/3357531

"As I have found that the ***proposal would cause harm to the character and appearance of the area, the National Planning Policy Framework (the Framework) requires that evidence of alternative sites is provided to justify the proposed development****. Where this is in relation to a new mast or base station, this evidence should include that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure.*

I have no reason to doubt that the cell ***search area is extremely contained****. On the basis of the evidence before me, I am* ***satisfied that the appellant has demonstrated that there is an identified need for the proposal to be located somewhere in the search area****.*

*The Council suggests that there are more suitable locations nearby. However****, the appellant has provided details of a number of alternative sites which were considered and discounted as part of the site selection process****, including detailed supporting information to fully corroborate that an exhaustive search of all possible sites was undertaken. These sites were discounted for a number of reasons including proximity to residential properties and other buildings, impact on visibility splays and proximity to underground services****. I am satisfied that there are no realistic opportunities to erect antennas on existing buildings, masts or other structures****. I consider that* ***the site selection process was robust and potential alternatives discounted on reasonable grounds and that the appellant has demonstrated that there are no clear alternatives which would be preferable. This carries significant weight in favour of the proposal.***

The ***proposal would support high-quality infrastructure, an approach which is supported by Chapter 10 of the Framework****. When* ***balancing this benefit against the harm identified in***

***relation to the first main issue, I consider that <u>the benefits of the proposal would outweigh the identified harm</u>** to the character and appearance of the area."*

<u>APP/P4605/W/25/3359873</u>

*"The southwest boundary of the Edgbaston **Conservation Area (ECA) is located in close proximity to the appeal site and generally runs along Pritchatt's Road. Furthermore, the Grade II* Chamberlain Tower is located to the southwest of the appeal site** within the grounds of a Birmingham University campus. The proposed mast would be located within the setting of both, which I note is not in dispute. I have also had regard to the appellant's HIA which establishes the significance of both designated heritage assets and the potential impacts of the proposal."*

*"The appeal site would be clearly visible in the setting of the ECA, most notably from the junction of Pritchatt's Road and Farquhar Road. I have already concluded that **the proposal would be harmful to the character and appearance of the area**. The modern, utilitarian appearance of the most would be compounded by its height and appear incongruous in the area as a result. **This would harm the setting and thereby the contribution this makes to the significance of the ECA**. Moreover, section A.2(1)(c)(i) of part 16, class A of the GPDO states that permitted development of this type is subject to the condition that the siting and appearance of any development which is visible from a site which is article 2(3) land, as in this case, must ensure that the visual impact of the development on the site is minimised so far as practicable, taking into account the nature and purposes of the site. It is unclear as to what steps have been taken to minimise the impacts of the mast and its ancillary equipment in this instance."*

*"Taken together, **the proposal would cause harm withing the setting and thereby harm the significance of both the ECA and the listed tower**. I have therefore had regard to the provisions of paragraph 212 of the Framework which advises that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is of particular importance given the Grade II* listed status of the tower."*

"Insofar as they are material considerations, the proposal would be contrary to policies DM16 of the DPD, PG3 of the BDP and advice in the SPD. These seek to ensure telecommunications equipment would not have unacceptable harm on heritage assets and their setting, among other things."

"Heritage Balance
*The GPDO is clear that the only considerations should be the siting and appearance of the proposal. In granting permission under Article 3(1) those benefits have effectively been acknowledged already. However, as per paragraph 215 of the Framework, **the harm I have identified should be weighed against the public benefits of the proposal**. I agree that the **harm would be less than substantial**, but worthy of great weight against the proposal."*

"The mast and its equipment would evidently improve 5G coverage in a small geographical area is part of a wider network, where the network may be undermined by gaps in coverage. Whilst

only users of that particular operator would be using the service, ***these aspects are recognised as public benefits****."*

"The proposed development's ***public benefits, through enhanced digital communications networks, attract significant weight in favour of the scheme****. In recognising the great weight attached to the harm caused to designated heritage assets,* ***the Government places considerable importance on the benefits of economic growth and social well-being from the expansion of the nation's electronic communications network. On this occasion, I consider that the benefits would outweigh harm to the significance of the designated heritage asset and its setting.****"*

"On the basis of the evidence before me, I see no reason to disagree with the appellant's site selection process and while the Council was frustrated at not having this information at application stage, it has had the opportunity to comment at appeal. Nothing substantive was forwarded on this matter in their appeal statement of case. I understand that the site is close to identified sensitive locations such as heritage assets and educational institutions. I have considered these matters. However, the evidence on balance shows that ***the lack of alternative options to deliver improved coverage and capacity within the required area is a consideration which weighs strongly in favour of the appeal****."*

"The siting and appearance of the proposal would ***result in some limited harm to the character and appearance of the area and to the setting of the ECA and a Grade II* listed building****. These attract significant weight against granting prior approval. However, in* ***the absence of a more suitable alternative site within the required area and the need for the installation, that harm would be outweighed by the benefits provided by the improved telecommunications coverage and capacity****. The proposal would therefore comply with the Framework when read as a whole with due regard to supporting high quality communications. I therefore conclude that the appeal should be allowed, and that prior approval is granted."*

It is clear that the proposal, subject of this application, has significantly less heritage impact than the appeal example provided.

It is clear that this proposal complies with…

- Manchester Local Plan
- Places for Everyone Joint Development Plan for Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan 2022 to 2039
- Greater Manchester Strategy 2025-35
- National Planning Policy (NPPF)
- National Planning Guidance (Code of Practice for Wireless Network Development)
- Wider national economic and digital aspirations and strategies
- Meets appropriate balance tests applied in appeal decisions

Planning Assessment

In accordance with Part 16 of the Town and Country Planning (General Permitted Development) (England) Order, this development is to be assessed primarily in terms of its siting and appearance.

While the provisions of the local development plan are not determinative, they remain material considerations where relevant to matters of design and visual impact. The key issues arising from this prior approval application are whether the proposed structure would appear visually intrusive or out of keeping with the character of the area, and whether any such impact would be outweighed by the substantial social and economic benefits associated with the deployment of 5G and the enhancement of next-generation digital infrastructure in the context of the technical constraints and lack of less impactful siting options.

Siting

As previously detailed, there is an urgent requirement to enhance mobile network coverage in the Upper Brook Street area. The siting of the installation has been carefully selected within a defined search area, ensuring the structure delivers the necessary coverage and capacity while avoiding duplication of infrastructure, in line with the NPPF policy and guidance on minimising mast proliferation.

It is important to acknowledge that it is rarely possible to introduce new telecommunications infrastructure into an area without some degree of visual impact. However, through sensitive siting and design, that impact has been minimised as far as practicable in this case.

The proposed location, set back on the pavement away from any throughflow will comfortably accommodate the proposal within this context would not create any unacceptable additional harm beyond what is there already. In fact, the vertical street structures and lampposts provide screening and backdrop, which is directly advocated in local and national Planning Policy and Guidance.

Crucially however, the proposed development lies outside the direct line of sight of the nearest residential properties and utilising existing extensive vertical infrastructure and highly urbanised environment to assimilate to preserve amenity impacts.

Due to the careful siting, surrounding landuse, the proposal does not result in any unacceptable visual dominance or overlooking of sensitive receptors. Where visible it will create minimal material harm given the commercial nature of the siting adjacent to existing street furniture, vertical infrastructure and non-sensitive landuse such as commercial buildings etc.

An extensive sequential site search was carried out and it has been robustly demonstrated that this is the only viable location in the search that will cause no significant impact to streetscene, residential amenity, visual amenity or heritage assets. There are other technically viable locations, however, they would be significantly more impactful on the local area than the proposal.

Visual appearance & Design

The height of the pole is the minimum height required to provide high-quality 4G and 5G coverage to the intended target area while addressing the technical constraints alluded, and the need for ICNIRP compliance given the larger exclusion zones associated with 5G equipment. This will be fleeting glimpses as people pass by. This minimal view, in the context of existing vertical infrastructure and extensive other street furniture, ensures there is no significant harm.

The design of the pole is done to minimise impact – a pole is the most suitable design for this particular area as a lattice or open headframe tower would appear incongruous.

The grey colouring will assimilate with the streetscape backdrop it will be set against. This will minimise contrast as advocated in local and national planning policy and guidance. The antennas will remain grey as they need to 'see over' the nearby buildings so grey will ensure they do not contrast from the typically grey sky it will be viewed against. The height is the lowest possible that will work and the cabinets will be painted fir green to blend with street level vegetation, maintaining a tidy and consolidated area. The proposal is set back on the verge so will cause no impact on pedestrian flow.

Regarding antenna design, it is technically essential that the latest 4G and 5G antennas remain unshrouded**.** Higher-frequency signals required for fast data transmission are unable to effectively propagate through materials such as Glass Reinforced Plastic (GRP), which would be used in any shrouded enclosure. This limitation applies particularly to 5G but also affects advanced 4G antennas. Shrouding the antennas would compromise their performance, necessitating additional infrastructure elsewhere, again leading to a proliferation of masts. Shrouding would also act as a wind sail and add significantly greater windloading, necessitating a significantly more bulky structure than what is currently proposed. As an alternative to shrouding, banding is added between the antenna apertures to make the pole appear less cluttered and more streamlined.

In summary, the proposed design is the least visually intrusive whilst achieving the required level of continued coverage, providing brand new 5G coverage and capacity to the area (as well as improving the existing 4G coverage). As such the proposal development is sited and design to minimise the impact on the visual amenity, character and appearance of the surrounding areas. The structure makes the most of the existing setting and is the minimum possible height to be ICNIRP compliant, clear the urban clutter and for the antenna signal to reach the target coverage area.

As a result, the proposed development fully accords local and NPPF policy by striking a balance between visual and amenity concerns with the operators technical requirements.

Residential Amenity

The nearest residential properties can be viewed from residences on Carmoor Street, however views from here will be in the context of busy roads and against the commercial backdrop and tall buildings.

Any views to the proposal from the nearest residential property will be against the backdrop of this commercial landuse, across intermittent development of busy roads and in the context of

numerous existing lighting columns and street infrastructure in a highly urbanised and commercial context. With this in mind there will be minimal impact upon residential or visual amenity from the proposal.

The development will not result in any loss of privacy, nor will it emit any noise, odour, artificial light, or vibration that could impact residents. The cooling fans within the equipment cabinets only operate under high temperatures and are not audible beyond a few metres. Site visits for maintenance are minimal and infrequent, generally once or twice per year with handheld tools only.

Given these considerations, the proposed installation would have zero impact on residential amenity, with no material harm to outlook, privacy, or noise conditions. The proposal therefore complies with both national and local planning objectives for protecting amenity.

Sequential Test and Lack of Alternative Options

This is a very defined search area. This is due to the limitations of 5G discussed throughout this document and the fact that the replacement site must be in reasonably close proximity to the site it is replacing to fit within the wider cell network – simply put, the higher frequency cannot travel far or through material as well and so sites must be directly where the demand is.

Great effort was made to identify a location that could deliver the necessary service while minimising impact.

There were 10 alternative options discounted in this very small and defined search area. These were discounted due to impacts on visual amenity, pedestrian obstruction, impacts on heritage assets, ICNIRP challenges, underground services and/or the unsuitability of rooftop sites.

The proposal is the least impactful, technically viable, location in the area – it is sited in a highly commercialised and urbanised setting with significant existing street furniture with which it will assimilate.

The robust sequential test with numerous discounts, and through design consideration, confirm proposal is certainly the least impactful, viable, siting and design capable to delivering the necessary service uplift. With that in mind it the proposal meets the NPPF policy test related to 'minimising harm (while taking account of the technical considerations)'. This principle also aligns with the appeal decisions referenced above.

The proposal is permitted development (albeit 'with prior approval') so the principle of the development is established in law via Part 16 of the GPDO. This is an important distinction as under permitted development a solution must be found as consideration cannot be given to the principle, only that the proposal is the most suitable option in terms of siting and appearance.

This is significant in an area as constrained as this, especially when such careful consideration has been given to siting and design to minimise impact while remaining functional and addressing the technical constraints.

Given the robust sequential test applied, and the relevant principles, this proposal is acceptable in planning terms.

Conclusion and Planning Balance

To conclude, there is a well-documented gap in mobile phone coverage and capacity within the Upper Brook Street area of Manchester. The proposed development addresses this critical gap by delivering improved 4G coverage and brand-new 5G capability to the area.

The selected site in a commercial area means it avoids direct proximity to residential properties and sensitive uses, while making optimal use of vertical street structures to minimise visual impact – as directly advocated in national and local planning policy and guidance.

A comprehensive site search and assessment of discounted alternatives has demonstrated that this is the most suitable and sustainable location available within the defined search area. All other considered options were ruled out due to visual sensitivity, impact upon heritage assets, impact upon residential amenity, impact upon streetscene or lack of structural capability. The site selected, set back on a grass verge away from any throughflow, is advocated and preferred.

The design is the lowest height it can be to attach the antennas at the necessary height to meet technical requirements of 5G. It is the most slimline it can be while being structurally capable while hosting antennas at height for radio propagation and ICNIRP compliance. It uses suitable colouring to minimise harm. All of these technical constraints align with principles noted and established in the UK Govt Planning Guidance – 'Code of Practice'.

The proposed development would not cause harm to heritage assets in the locality given the existing urbanised context of the site meaning the site will be congruous and additional harm will be minimised. This accords fully with the requirements of both local planning policy and the NPPF, particularly in relation to digital infrastructure provision and sustainable development. It meets the NPPF policy test to minimise harm (minimise, not invisibility) **while taking account of the technical constraints**, as noted in the Code of Practice.

The robust sequential test with numerous discounts, and through design consideration, confirm proposal is certainly the least impactful, viable, siting and design capable to delivering the necessary service uplift. With that in mind it wholly meets the necessary tests for an application for 'prior approval', where the principle of development is established in law via Part 16 of the GPDO.

In terms of Planning balance - any visual impact is considered minimal and localised. When that minimal and localised harm is weighed against the technical constraints, lack of favorable alternatives and public benefits of improved 4G and new 5G mobile connectivity, would not significantly or demonstrably outweigh the scheme's material socio-economic benefits and contribution to national, regional and local digital and economic objectives, as set out in the NPPF and other documents referenced. This ensures this is a wholly acceptable proposal in Planning terms.

For these reasons, the proposed telecommunications installation is considered wholly appropriate in planning terms and is respectfully submitted for the local planning authority's approval under the prior approval process.

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