SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Butler Street	Site Address:	Footpath on south side of Butler Street / Woodward Street junction (north of 126 Butler Street) Ancoats Manchester M4 7JJ
National Grid Reference:	385573, 398879		
Site Ref Number:	CS-30988000 VF-059378	Site Type:[1]	Macro

2. Pre-Application Check List

Site Selection

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	No
If no explain why: Public access system checked		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why:		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	Yes
Date of pre-application contact:	18 June 2026
Name of contact:	N/A
Summary of outcome/Main issues raised: A pre-application consultation was issued to the LPA on the above date. This included a written description of the proposal and why it is required along with a consultation plan, discounted site information and draft planning drawings. However, no comments have been forthcoming. It has now been deemed appropriate to progress to a formal application stage.	

[1] Macro or Micro

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Annual area wide information to planning authority

Has annual area wide information been provided?	No
Summary issues raised: Cornerstone's commercial relationship with the operator in question, i.e., VodafoneThree, has changed, effectively increasing an independence to work with other companies in the deployment of mobile infrastructure. It means Cornerstone no longer have visibility of the operator's full update plan. However, Cornerstone is fully committed to working closely with Local Planning Authorities and following best practice guidance. Cornerstone aim to engage and work with the planning department at the earliest opportunity from when instructed to deliver new infrastructure within your Local Authority area and often conduct strategic pre-rollout engagement meetings to discuss our wider rollout. If your Local Authority would like a meeting to discuss wider Cornerstone rollout plans, then please advise. We recognise the importance of developing long term partnerships and will always work with you to deliver improved mobile connectivity.	

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline of consultation carried out: The following were consulted as part of the initial application: • Ancoats and Beswick Ward Councillors • Manchester Central MP • Neighbouring residents			
Summary of outcome/main issues raised (include copies of relevant correspondence): No response			

School/College

Location of site in relation to school/college (include name of school/college): N/A
Outline of consultation carried out with school/college (include evidence of consultation): N/A
Summary of outcome/main issues raised (include copies of main correspondence): N/A

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Civil Aviation Authority/Secretary of State for Defence or the operator of the civil safeguarding area or defence safeguarding area notification (only required for an application for prior approval)

Will the proposed development be on a civil safeguarding area or a defence safeguarding area?	Yes	No
Has the Civil Aviation Authority/Secretary of State for Defence/operator of the civil safeguarding area or defence safeguarding area been notified?	Yes	No
Details of response: N/A		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	01 July 2026	

3. Proposed Development

The proposed site:
The development is located on the pavement on the southern side of Butler Street / Woodward Street in the north east of central Manchester area. The area is predominantly residential and characterised by a mix of dwelling type. The topography of the area is relatively flat and there are no restrictive planning policy designations present.



Fig. 1: Site Photo

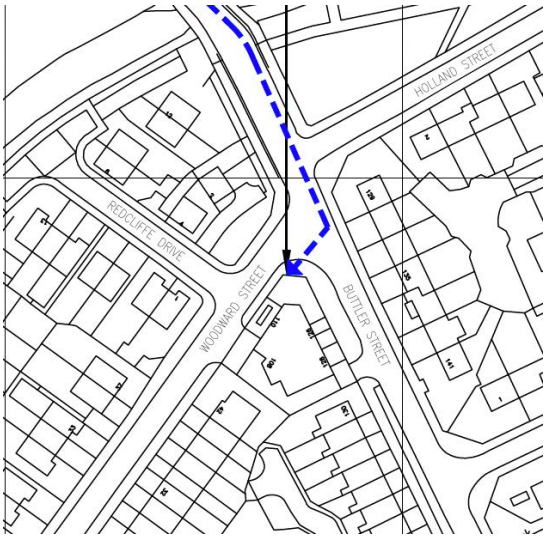


Fig. 2: Plan 100 extract

Enclose map showing the cell centre and adjoining cells if appropriate:
Cornerstone and the operator have historically supplied services to the area via a base station development at land north of Oldham Road, opposite the St Cuthbert's Parish Church. However, due to redevelopment plans this site was served with a 'Notice to Quit' (NTQ) and has since been decommissioned.

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

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To prevent a loss of coverage, a replacement base station at the rooftop of Naylor Court, off Gunson Street, was nominated for use and in 2022/2023 planning and rights to occupy the site were secured but the implementation of British Safety Act 2022 rules is preventing the site being brought to fruition. Experience has shown that fulfilling these requirements is a lengthy process usually taking 2-3years to complete, so in order to prevent a complete loss of coverage in the area whilst efforts continue for implementing this rooftop solution, a temporary base station has been deployed at Lower Vickers Street, using Emergency Powers. However, the temporary nature of this infrastructure means that it is powered by an on-site generator and unfortunately the noise being generated is disturbing the amenity of this residential area.

In order to address this, Cornerstone and the operator is proposing a new temporary solution in the form of the subject proposal, i.e., a standard street furniture base station solution powered by a standard grid connection and deployed for a limited period of time until the preferred permanent rooftop site at Naylor Court is brought into operation.

One will appreciate that there is an obligation within the operators' Ofcom issued licences for continued investment to ensure network quality and capacity is maintained and improved where necessary, so the infrastructure must be in place to meet network demand and customer expectation.

A long-term loss of network services and capacity will be to the detriment of those living, working and travelling in the area and must be avoided.

A set of coverage plots has been included with this submission as **Appendix C** to this statement. These show the services supplied by the temporary base station, the loss of services if it is removed, and how the proposed development will resolve matters.

How mobile networks operate

The reader may be aware that cellular networks are made up of a series of individual cell areas, each of which has a base station within it to provide service to that particular area. Each base station has a maximum capacity for traffic, (i.e., the number of handset users that can connect to it at any one time), and oversubscription by users will result in poor customer connection experience such as connection failures, dropped calls and a reduction in mobile broadband data speeds for both uplink and downlink. It is therefore imperative that adequate network infrastructure is in place to cope with demand.

A good analogy for describing a cellular network is that of a patchwork quilt with each cell area being one of the many patches that are sewn together making up the network 'quilt'. The base stations themselves will require a supporting structure, such as a mast or high building, to support antennas and dish and to elevate such transmission equipment above clutter, such as tall trees and buildings and whilst taking account of topography, all of which could impede signal, and to ensure ICNIRP compliance. Associated cabinets for housing radio equipment and power connections are also deployed to service the antennas.

Telecommunications base stations receive and transmit to mobile devices using radio waves. The antennas operate like an aerosol spray with signal transmitted along a central orientation and dissipating with distance. Transmission dish links (which are required where fibre connections are not available) operate on a direct line of sight basis, linking with dishes on other base station sites elsewhere within the wider network. The dish or fibre links also connect the base station to a master control centre that manages the call handover process that occurs when a mobile user moves from one cell area to another, whilst also providing telemetric monitoring to ensure the site is working properly and offer remote maintenance.

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Mobile connectivity, service and capacity is required where customers live, work, travel and enjoy recreational time. In the early days of mobile communications, peripheral locations, high-level topographies and large-scale masts were often identified in order that transmission from a new base station could cover an expansive geographical area. However, whilst this approach was viable for early network generations, the number of mobile device users and the need for connectivity has dramatically increased with time, as have the advancements in mobile technology itself. Quite often it can be the case that although a degree of coverage is available in an area, demand exceeds the base station's capacity meaning that calls, text and data usage services are not available to all those wishing to use the network. As a result, the cellular network construction and operational criteria have changed over time too. Because modern networks use higher frequencies with faster data rates whilst serving significantly increased numbers of mobile device users, typical network cell areas (i.e., the geographical area targeted for coverage and capacity for which a base station development provides a solution), are now smaller in their geographical expanse and tend to be directly proportionate to the number of users within it. They are also, therefore, greater in their number with base stations operating at a lower power output than their predecessors.

It must be noted that in December 2021, the UK's MNOs confirmed to the Government (the Department for Digital, Culture, Media & Sport - DCMS) that they will not offer 2G or 3G services beyond 2033. Doing so will free up spectrum for 4G and 5G networks, enabling customers to benefit from better, faster and more reliable services. The 2G and 3G networks rely on older technology and transitioning them to newer 4G and 5G services involves increased operating costs, as well as a less efficient use of spectrum and energy.

It is critical to understand that the historical 4No. UK MNOs all utilise different technology spectrums to provide their mobile service. The spectrums the Operators utilise are allocated by Ofcom, as industry regulators on behalf of UK Government, through licence agreements with each of the individual MNOs. As such, each MNO must utilise the spectrum licenced to them. Each part of the radio frequency spectrum has variations in terms of frequency propagation. Therefore, each individual MNO's network, and their sharing arrangements, cannot be compared directly and there will be variations in how each of these networks is deployed and developed. For this reason, all MNOs, have a completely different network configuration that they need to fit within and build 5G service around. Therefore, the networks must be built differently, involve taller heights to overcome ICNIRP exclusion requirements, with different antennas and equipment, to take account of those spectrum and licence variations. This will in turn lead to necessary infrastructure variations on a cell-to-cell basis, depending on site specific demand, local constraints and requirement. As such, the individual networks will have variations in how their infrastructure is deployed and developed.

Type of Structure *(e.g. tower, mast, etc):*

Description:

The proposed temporary development (for a period of 3years) of the following:

- 20m street furniture style mast (Grey RAL7035)
- 6No. antennas (Grey RAL7035)
- 1No. 300mm dish (Grey RAL7035)
- 3No. cabinets (1No. 1900x600x1755mm; 1No. 700x700x1900mm; 1No. 655x264x1015mm) (Grey RAL7035)
- All ancillary development

All apparatus has been limited to a minimum amount and dimension for the purpose of addressing the operational brief.

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Overall Height:	
Height of existing building:	As per plans/above
Equipment Housing:	
Length:	As per plans/above
Width:	As per plans/above
Height:	As per plans/above
Materials:	
Tower/mast etc – type of material and external colour:	As per plans/above
Equipment housing – type of material and external colour:	As per plans/above

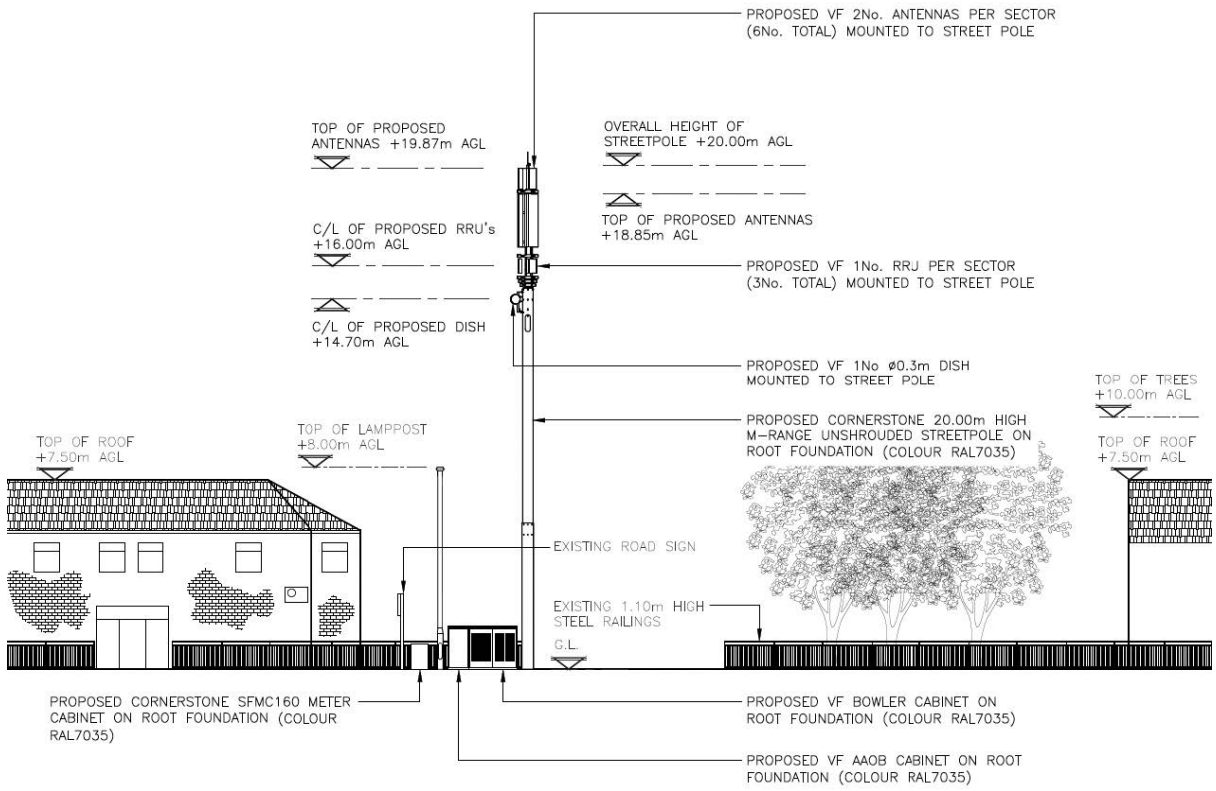


Fig. 3: Proposed development. (Plan 301 extract)

Reasons for choice of design, making reference to pre-application responses:

The design of any communications infrastructure is dictated primarily by operational requirements and secondly by the development's setting. From an operational perspective, the operator must ensure the following when devising a design solution for any site:

Antennas

- Need to be located at a height to transmit effectively and efficiently without signal being impeded by surrounding manmade and natural features within the landscape, known as clutter. Because 5G technologies operate in higher frequency bands than older technologies, attenuation of the radio signal is naturally higher and more prone to the effects of clutter. This means that operators will often require a higher structure or antenna position to achieve the same degree of coverage footprint as preceding generations.

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- Where possible, the antennas should also be tilted and orientated according to bespoke need and to maximise coverage, allowing them to best 'see' their target area.
- They must be located at a height and in a position to ensure ICNIRP certification, which establishes a public exclusion zone for areas around the antennas.
- If a shared solution is being proposed, then the antennas also need to be appropriately separated to prevent interference between the operating systems.

Dish links

- If required, these need to achieve a direct line of sight with other base station sites within the wider network. They are a backhaul solution and sometimes called microwave or transmission dishes, in which much like antennas they need to be positioned at height and orientated to see the neighbouring dish that it is intended to link with.

Cabinets

- Required to house the equipment that allow the antennas to function, these need to be located at the base of the mast to allow the feeder cables to run up the mast to serve the antennas. Seen on their own merits equipment cabinets and meter pillars are permitted development (only if they do not exceed 2.5m^3 each) that don't require a formal planning determination and are likened to cabinets deployed by utility companies throughout the UK.

The multiskilled design visit, onsite assessments and software predictions concluded that 20m to top of antenna height would be necessary for new ground-based mast at the nominated site, in order to clear the immediate clutter and take account of topography.

A total of 6No. antennas is required to fulfil the operational brief of improved multigenerational coverage and capacity (inc. 5G) services.

Whilst Cornerstone also has monopole and lattice mast design options for this height, the roadside nature of the site and limited width of the footway mean that a street furniture style mast was the only realistic mast type that would be viable in this location. A set of standard cabinets is also proposed to support the transmission apparatus to be installed upon the mast.

Due to the multigenerational, height needed and modern nature of the technologies involved, the Cornerstone design portfolio no longer includes a 'camouflaged' design option, (for example, as 'telegraph pole' solution as was available in earlier generations of technology), as shrouding or screening 5G antennas has a detrimental impact upon their operation, to the extent that it often renders such development unviable. In addition, 4G and 5G antennas and their feeder cables are much bigger and heavier than their counterparts in earlier generations of base station development, as they carry more data. This bigger equipment requires a more robust structure which in turn makes effective disguise a difficult task.

Further details in relation to each of the ground-based mast options, and those for building-based solutions, have been provided in the information below under the subheading 'Siting and Design Considerations' and in **Appendix A** to this Statement.

Health and Safety - including ICNIRP compliance

International Commission on Non-Ionizing Radiation Protection Declaration has been attached.

International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as

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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 or near to the site are taken into account.

In order to minimise interference within its own network and with other radio networks, the lead operator in this development:

- VodafoneThree

Operate their network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision.

As part of their network, the radio base station that is the subject of this application will be configured to operate in this way.

All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation, or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference.

The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.

4. Technical Justification

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

The Operational Brief

As indicated above, the proposed development that forms the basis of this application has been devised by Cornerstone, on behalf of the operator to provide temporary (3years) replacement multigenerational network coverage and capacity, and to establish new 5G connectivity, to the benefit of network users that live, work and travel in area.

Please note that Cornerstone and the operator would not be choosing to deploy a new base station site unless it were the only means of addressing their network requirements, as there are significant financial and time and effort implications for doing so.

Who will be benefit from improved coverage and capacity?

In considering the merits of this proposal for essential infrastructure, it is important to give due cognisance to those that are being impacted upon by the current lack of UpToDate coverage and adequate network capacity and will continue to be impacted upon if the operational brief is not fulfilled.

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According to recent figures published by MobileUK[2] it was estimated that there are 87 million active mobile subscriptions in the UK and according to recent figures produced by www.which.co.uk [3]in an article titled 'Best and Worst UK mobile networks', the customer base of the operator is as follows:

- Vodafone currently have approximately 17.5 million customers (approx. 20% of the market)
- Three currently have approximately 9.9 million customers (approx. 11% of the market)

Based on these figures, one can assume that approximately 31% of mobile network users in the local area would benefit from the proposal. It should, however, be noted that these figures do not include customers who use each of the operators' Mobile Virtual Network Operators (MVNOs)[4]. Most MVNOs do not publicly release subscriber counts but those that will benefit from the proposal include the following:

- Vodafone's MVNOs: Asda Mobile, Lebara, Talkmobile and Voxi
- Three's MVNOs: iD Mobile, Smarty and Superdrug Mobile

How people in the UK are using mobile communications networks

The 'Online Nation Report 2025'[5] produced by Ofcom and published in December 2025, confirms the following:

- UK adults spend an average of 4 hours 30 minutes a day online
- Smartphones accounted for the majority of online time for both genders (men: 75%; women: 79%).

Not everyone, especially those in more rural or lower income areas, has access to fixed broadband, so many rely on smart devices to get online. Because mobile connectivity is now essential to daily life, inadequate mobile infrastructure can prevent users from accessing vital digital services. If these gaps persist, the Government's wider digital goals will not be achieved.

Demand and Expectation

The dynamic nature of technological advances in the telecommunications industry coupled with ever increasing demand from subscribers dictates a continual reinvestment programme on the part of licenced operators and as a result, and in line with their licence requirements, companies such as Cornerstone are constantly developing, refining and modernising mobile network infrastructure.

To set the scene on the growing demand for effective communications networks over recent years we would refer the reader to the following Ofcom publications. One would first draw attention to an Ofcom discussion paper publication entitled 'Mobile Networks and Spectrum', dated 09 February 2022[6], which considers the future demand for mobile services encouraging longer-term thinking about spectrum for mobile networks and how consumer and business needs can be met. Section 2 of the paper includes the following information under the subheading 'The growth of mobile':

[2] https://www.mobileuk.org/mobile-facts
[3] https://www.which.co.uk/reviews/mobile-phone-providers/article/mobile-phone-provider-reviews/best-mobile-networks-overview-amhDx1F0z41t
[4] MVNOs are providers that offer mobile services without their own signal or infrastructure, i.e., they piggyback on one of the four major networks, i.e., those listed above and EE
[5] https://www.ofcom.org.uk/siteassets/resources/documents/research-and-data/online-research/online-nation/2025/online-nations-report-2025.pdf?v=409837

[6] https://www.ofcom.org.uk/__data/assets/pdf_file/0017/232082/mobile-spectrum-demand-discussion-paper.pdf

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> *"In recent years we have seen an average 40% year-on-year growth in demand for mobile services provided over public mobile networks. This growth has been driven by the development of new applications and enabled by evolving technologies and consequent changes in consumer behaviour.*
>
> *We expect demand for mobile data will continue to grow as we rely on it ever more to carry out daily activities like shopping, gaming, banking and watching movies. Demand is likely to be stimulated further as new and more sophisticated applications are developed, and by the development of machine-to-machine and machine-to-device applications."*
>
> Paragraphs 2.6-2.7

In publishing the discussion paper, Ofcom welcomed stakeholder inputs on the initial thinking, including on the potential opportunities and challenges associated with network densification in the UK and whether there are opportunities for more spectrum to be made available for mobile use on a local basis, so that they may then develop a future strategy for mobile spectrum.

Following on from the above, a conclusions paper has since been published by Ofcom on 06 December 2022, entitled 'Ofcom's future approach to mobile markets and spectrum'[7], within which Section 1 'Overview' confirms:

> *"We expect demand for mobile data to continue to grow as greater use is made of data-hungry services and as new technologies enable new uses."*
>
> Paragraph 1.1

And continues under the subheading 'Our future approach':

> *"Network quality is likely to be of growing importance to customers."*

So, there should be no doubt that there is a customer expectation and Ofcom requirement for continued investment by operators to ensure they accommodate ever-increasing customer demands with network quality and improvement where necessary.

Public Benefit

It is undeniable that mobile communication is now a key part of sustainable development and a vital tool in our personal lives and in both business activities and government operations. Indeed, the demand for faster and improved mobile connectivity continues to grow with modern society now expecting to be able to make use of mobile devices to their full potential where people live, work and travel. Each new generation of mobile communications technology has provided us with higher speed, better connection, and many more advanced features on our mobiles, and now with 5G, we can expect to experience an even more extensive range of telecommunication services. There is, therefore, a drive by the Government to ensure that all communities, both urban and rural, have access to the most up to date mobile technology, given the clear sustainability, social and economic benefits for doing so. Indeed, the Government in Westminster has indicated that further reforms will take place to streamline the delivery process for critical infrastructure, which includes telecommunications, as outlined in their 2024-25 agenda via the King's speech on 17 July 2024.

Good connectivity allows people to access a wide range of essential services and a further explanation on some of these key benefits is provided below:

- Economic benefits

[7] https://www.ofcom.org.uk/__data/assets/pdf_file/0036/248769/conclusions-mobile-spectrum-demand-and-markets.pdf

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- Creating more productive and cost efficiencies for businesses
- Businesses offering online services can extend their products to a broader audience
- Local areas and businesses can benefit from tourists and visitors as hotels, attractions, and restaurants can be booked online from anywhere in the world
- Business owners and services like doctors can provide a faster and more cost-effective service by offering both online appointments and ordering
- Digital connectivity facilitates economic growth, something which the Government is keen to progress and promote
- 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high-definition images and video), increased capacity and heightened security will also facilitate learning on the job procedures, thanks to technologies such as Augmented Reality (AR) goggles, which, for example, can give the likes of engineers real-time instructions on how to fix a machine on a production line.

- Social benefit

  - Mobile communications can help people to stay in touch wherever and whenever, which can help improve social wellbeing
  - Convenient access to online commerce or businesses
  - Contacting emergency services is easier, especially in remote areas
  - Giving the ability to manage our personal finances and information 24/7
  - Using a mobile wherever you go can provide better personal security
  - Having access to social networking sites and applications can keep people entertained with their lifestyles and interests
  - Access to real-time transport information or timetables
  - Smart meter reads for utilities such as gas or electric
  - Contacting local authorities
  - Promotion of smarter and productive ways of working. For example, working from home can help minimise commuting which can provide better work and home life balance

- Sustainability and Environmental benefits

  - Facilitating remote access to services, education, and commerce, reducing the need to travel and in turn minimising carbon emissions.
  - Better monitoring and control of energy consumption through climate change technology, smart metering and smart energy grids.
  - 5G infrastructure requires fewer heat generating electronic components.
  - 5G enabling of the Internet of Things (IOT) sensor deployment can manage and alert us to pollution risks, health hazards and flood risk.
  - Provision of smart technologies within the agricultural sector will facilitate more efficient and less wasteful practices helping to limit negative impacts.
  - 5G networks allow monitoring of traffic flow resulting in less congestion and better air quality. They also make driverless cars possible; a means of transport that offers better fuel efficiency.
  - Smart cities and buildings can rely upon 5G networks to enable buildings and infrastructure to use automated energy saving through better and more efficient lighting, heating, cooling and other operations.

- Health benefits

  - Support the delivery of healthcare provision and accessibility by enabling people greater access to online services, NHS appointment reminders, reminders to take medicines, make appointments etc.

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

- Education benefits

  - Facilitates access to educational establishment databases or booking systems for securing places for the likes of school dinners, field trips, extra-curricular activities, student/teacher reviews, etc.
  - Provides access to school/college/university apps for setting and submitting homework/coursework, ensuring news and notifications are delivered efficiently, and for parent/student/teacher interactions.
  - The relationship between 5G and education is evolving at a massive rate with educators exploring the relevance of Virtual Reality (VR) technologies for education and training. Crucially, VR can support remote learning, allowing students a presence in the classroom even when working elsewhere.

5. Site Selection Process

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

Search Area

One will also appreciate that in seeking to identify a suitable base station site for addressing a network requirement, the operator's network planning team will define a search area in which a solution must be found in order to fit seamlessly into the existing and planned network for the wider area. These parameters are set by the network planner and may differ from site to site. It is also important to note that the boundaries do not take account of topography nor existing built or natural features, so one must appreciate that not every available site within this area will be viable form an operational perspective.

A Sequential Approach to Site Selection

With full respect to national and local planning policy preferences, a sequential approach to site selection was adopted, with the following factors having each been considered in order:

- Is there any existing base station within the operator's network that, if redeveloped or upgraded, could address the operational requirement and, if so, would this option represent an appropriate balance between operational and planning considerations?
- Is there any existing base station within another operator's network that, if redeveloped or upgraded, could address the operational requirement and, if so, would this option represent an appropriate balance between operational and planning considerations?
- Are there any opportunities for the deployment of the operator's base station on a rooftop or at another structure and, if so, would this option represent an appropriate balance between operational and planning considerations?
- Is a new ground-based mast the only available option and, if so, would this option represent an appropriate balance between operational and planning considerations?

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In seeking to identify a viable option capable of fulfilling the operational brief, the site selection process also has to take account of the following factors:

- Development must take place at a location within the target area / defined search area.
- The base station must have access to a power source and the cost for connection must be within budget. Excessive grid connection costs can render certain base station developments financially unfeasible.
- Reasonable access for construction, maintenance and decommissioning purposes must be achievable
- The development must be able to facilitate the antennas being able to 'see' the area they are to serve, i.e., the antennas will need to protrude above surrounding clutter to ensure effective signal transmission and avoid infringement.
- The base station development must be able to achieve compliance with ICNIRP Certification requirements.
- The base station development must be able to connect within the wider network via a fibre connection or a transmission dish link that can achieve direct line of sight with other base stations in the network.

Siting and Design Considerations

Cornerstone design portfolio options range from building-based solutions including stub masts, pole-mounted supports, and wall-mounted antennas. Ground-based masts designs include lattices, monopoles with open antenna headframes or street furniture style masts. Please refer to **Appendix A** for further details on design options.

At ground level a base station will typically involve equipment cabinets and electricity meter pillars that range in size but will be of similar appearance to those deployed by utility companies. Subject to the site-specific design, i.e. if a mast is 'climbable', and there is available space, then some ancillary development may include a fenced compound for security purposes.

When considering the potential viability of a rooftop site or the use of another structure, one must take account of the following factors:

- Height

  It is imperative that the building or structure is of sufficient height, or can accommodate an antenna support of sufficient height, to allow the antennas 'see' the area they are to serve without being impeded by clutter. The height which a proposal protrudes above the roof can be implicated by the weight of the installation and its wind loading.

- Type of building/structure

  Not all buildings or other structures will be viable for use and operators have a duty of care to ensure that their equipment is installed safely. For example, attaching apparatus to light weight, wooden rafters and joists is simply not an option, as these are just not strong enough to support the weight of modern communications apparatus. Mounting equipment upon walls or gable ends also requires sufficient bracing to account for wind loading and stability requirements, requiring bolts through the entire wall and fastened internally via a number of back plates. This would have legal implications and would be intrusive for the occupants, both during construction and maintenance with the backplates requiring to be checked at least once a year on routine maintenance visits. Also, telecommunications equipment cannot be supported on sloping roofs due to the simple laws of physics and the fact that such roof types offer nothing for the equipment to attach to. As such the equipment would slide off under its own weight taking any roof surface with it.

- Equipment weight and structural soundness

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One must consider the structural integrity of the building and the support structure in terms of the weight of the proposed antennas and the associated wind loading requirements. Each modern antenna weighs approximately 50kg and would need to be supported by 3No. Remote Radio Units, each of which weighs approximately 30-35kg, i.e., 12No. antennas and 36No. RRUs for a shared rooftop site would weigh in the region of 1.6 tonnes minimum excluding any support structures, steelwork or feeder cabling. On this basis the transmission equipment for a single operator site requiring 6No. antennas and 18No. RRUs would weigh in the region of 0.8 tonnes minimum.

Also, consideration needs to be given to the support structure and steelwork required to accommodate the antennas at the required heights, be it a wall-mounted bracket, a wall-mounted support pole, a pole-mounted antenna scheme deployed upon streel grillage for stability or a stub mast. Please note that a 10m stub mast with headframe including the supporting steel grillage (excluding antennas, RRUs and feeder cables), weighs approximately 4.3 tonnes. Without the headframe the weight would be circa 2 tonnes (excluding antennas, RRUs and feeder cables).

Other weights that need to be accounted for include any cabinetry and the steel grillage upon which these elements must be set, the feeder cables that link the antennas to the cabinetry, and any handrailing required for health and safety purposes.

Undertaking significant structural alterations or modifications to buildings to make them capable of accommodating such weights is not an option for Cornerstone. Therefore, if a building fails a structural survey, then the building is not suitable for use. In certain cases, it is obvious that the structural integrity of a building is an issue without the need for a detailed survey, as they were simply not built or designed to accommodate telecommunication infrastructure development of the form and weight required. In addition, standard 2-3 storey buildings are not tall enough for multigenerational technologies to be accommodated at heights that will meet ICNIRP certification and avoid signal infringement, (5G being more prone to signal attenuation), by surrounding clutter, as the supporting structures would need to be taller than the host building itself, which would put undue stress on the building, especially when wind loading is taken into account. Lastly, from an aesthetical point of view, it is important that rooftop telecommunications development is proportional to the scale of the host building as deploying a support structure that far exceeds the height of the host building would look extremely out of place and prominent.

- General Health and Safety

  The site in question must be capable of accommodating ancillary development required for health and safety of those that will be maintaining the site, i.e., the use of handrailing or latch systems, hooped ladders and resting platforms.

- ICNIRP

  To achieve ICNIRP compliance the operator must be certain that access to the antennas, be they on a rooftop or ground-based structure, is restricted to authorised personnel only. They must also consider if the available antenna locations will ensure ICNIRP compliance with neighbouring buildings, other operator's antennas present nearby, and any accessible areas at height. In this regard horizontal and vertical separation is essential for those that might be maintaining neighbouring lighting columns, trees and windows so that they do not unknowingly encroach upon the exclusion zones around the live antennas.

- Signal Clipping

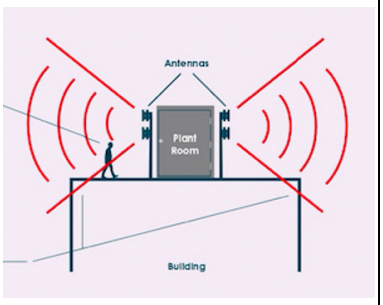
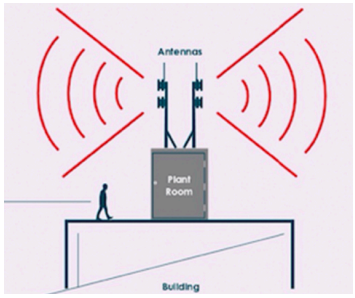
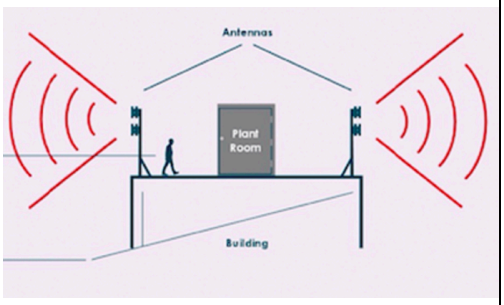
  Clipping occurs when the expanse of a rooftop itself and or corner sections reflects the signal transmitted by the antennas. To avoid this, antennas either need to be positioned close to the edge of the roof or at a greater

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height in a central location to allow for the angle of signal propagation to clear the immediate rooftop obstacle. Please refer to below which is 'Scenario 1' in the Code of Practice for Wireless Network Development in England - Annex C – Rooftop Developments.

Fig. 4: Signal Clipping and Exclusion Zones

Scenario 1: Not viable	Scenario 2: Viable	Scenario 3: Viable
		
Antennas propagating across the rooftop make it inaccessible due to the ICNIRP exclusion zone. Signal clipping is also occurring.	The antenna height means the person is not within the ICNIRP exclusion zone and signal clipping is not occurring.	The antennas propagate outwards and those accessing the rooftop are not within the ICNIRP exclusion zone. Signal clipping is not occurring.

When considering potential development options for new ground-based masts, there are several non-planning based general considerations that must be taken into account, namely:

- Underground utilities and services

  The presence of underground services is commonplace, especially at roadside and adopted highway's locations. Underground services can limit the usable space, preventing necessary mast foundations from being achieved, rendering developments unviable. It is not possible to build on top of underground services. Whilst it may sometimes be possible to undertake diversions of existing services to facilitate development, subject to available route/space, one must appreciate that such works come at a cost and to do so can render the base station development financially unfeasible. Not all underground services can be diverted, and their presence influences the viable position of a base station given the retained clearances and easements that utility companies still require in order to access and maintain them.

- Overhead utilities and services

  The presence of overhead services can be problematic, not just for the construction of ground-based masts, but also for their operation, as operators must ensure that ICNIRP guidelines are adhered to and that those maintaining such infrastructure at height do not encroach upon the exclusion zones around the proposed antennas. Again, whilst it may sometimes be possible to undertake diversions of existing services to facilitate telecoms development, subject to available route/space, one must appreciate that such works implicate on the utility company and the services they provide to their customers, hence this comes at a cost and to do so can render the base station development financially unfeasible. Not all overhead services can be diverted.

- Presence of trees

  Developments must seek to minimise the risk of conflict with the root protection areas and overhanging canopies of mature trees to limit impact upon the health of the tree(s) in question. This matter becomes more

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sensitive when dealing with protected trees such as those in Conservation Areas or that are subject to Tree Preservation Orders. One must also appreciate that whilst trees can provide useful screening for ground-based masts, the antennas must be of sufficient height above the trees to provide effective coverage to the target coverage area and to ensure that signal transmission is not impeded. Especially when trees are in leaf and when wet, it impacts on the propagation of the signal as the tree foliage will absorb the radio frequency meaning the signal is broken or lost, hence the need for height and the full length of the antennas to clear the immediate natural clutter.

When considering potential development options upon adopted highways land, or at roadside or pavement locations, there are several other general considerations that must be taken into account, namely:

- Existing street furniture

  The presence of other street furniture elements, such as streetlights, telegraph poles, cabinetry, signage and other street furniture elements, can limit the usable space in / on adopted verges or footways and/or create an unacceptable level of clutter. The presence of such elements can often restrict new street furniture base station development to locations that may impact pedestrian flow or impede highways safety requirements, both of which must be avoided for the development to be viable. The presence of vertical street furniture elements like telegraph poles and streetlights can be problematic as operators must ensure that ICNIRP guidelines are adhered to and that those maintaining such infrastructure do not encroach upon the exclusion zones around the proposed antennas.

- Points of access/egress to private properties

  In built up areas, both public and private properties will often benefit from off-street parking, driveways, entrance and exits points and pedestrian routes in and out of the building. It is important that the development of street furniture base stations in roadside locations next to these types of arrangements does not compromise pedestrian and vehicle movements, access arrangements to properties nor impact on highway safety.

- Highways and pedestrian safety requirements

  When nominating a site for street furniture base station development, it is imperative that the infrastructure does not infringe upon visibility splays and meets the requirements of the Department for Transport's 'Inclusive Mobility' guidance document, for safe passage of pedestrians, including those using pushchairs and wheelchairs, see below for details. It is also important that the speed limit of the road is taken into account as this can sometimes mean a requirement for the installation traffic barriers for road safety purposes.

- Design limitations of street furniture masts

  Street furniture mast are the slimmest structures available for use in operators' design portfolio and tend to be used in roadside locations and in more sensitive settings such as suburban or residential areas.

  Street furniture masts can only accommodate 3No. sector antennas at any one height and these must be set at 120° separations due to being positioned in a rigid, back-to-back formation. This prevents operators from being able to orientate or tilt antennas to direct their signal to the specific areas. Street furniture mast solutions are therefore much more limited in terms of operational potential when compared with the likes of a rooftop solution, or a monopole with an open headframe or lattice structure, all of which can provide bespoke antenna layouts.

  Due to the multigenerational and modern nature of the technologies involved, the operators' design portfolio no longer includes a 'camouflaged' street furniture design option, (for example, as a timber effect 'telegraph

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pole' solution, as was available in earlier generations of technology). This is because modern antennas are simply too big and heavy to be contained in a disguised solution. In addition, enclosing antennas within GRP shrouding has a negative upon signal transmission of modern antennas, i.e., 5G signal is more prone to attenuation and therefore requires a higher position than earlier antenna generations to ensure the same degree of coverage is achieved.

In terms of the mast width, street furniture masts incorporate the minimum girth necessary to ensure the structural viability of supporting the transmission equipment and housing the associated feeder cables that run through the body of the monopole to connect these elements to the cabinetry. Please note that 4G and 5G antennas and their feeder cables are much thicker and heavier than their counterparts in earlier generations of base station development, as they carry more data. This larger equipment simply cannot be safely supported by or fit into a slimmer mast design.

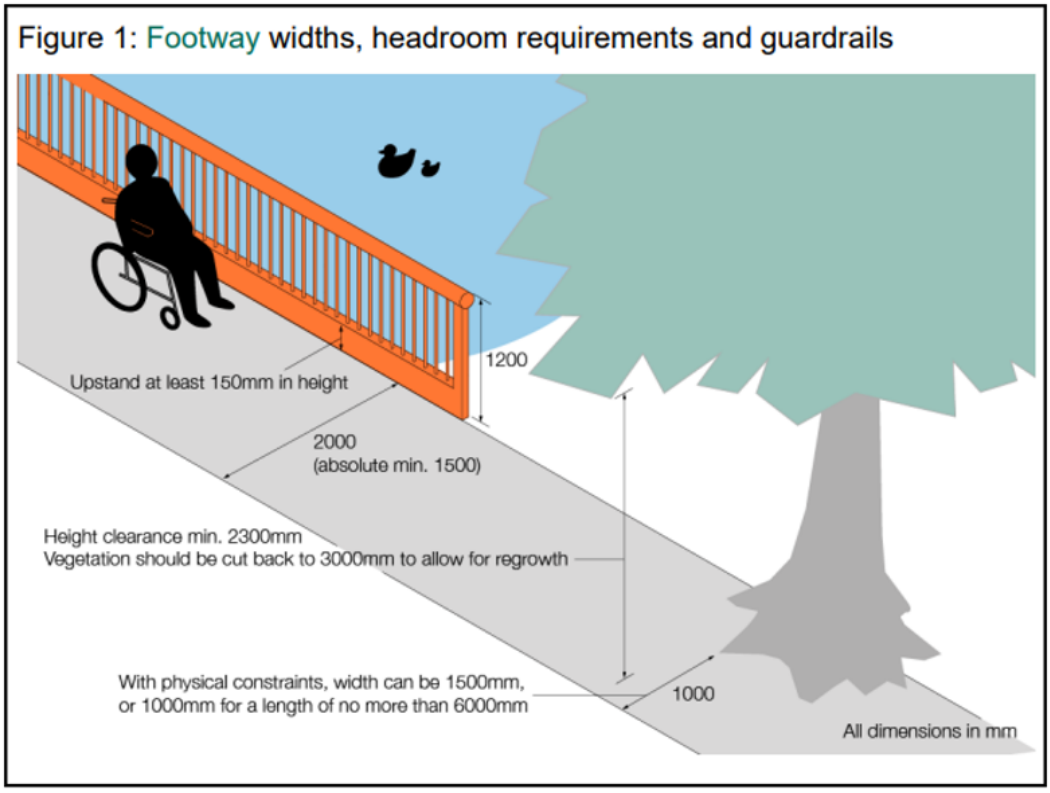
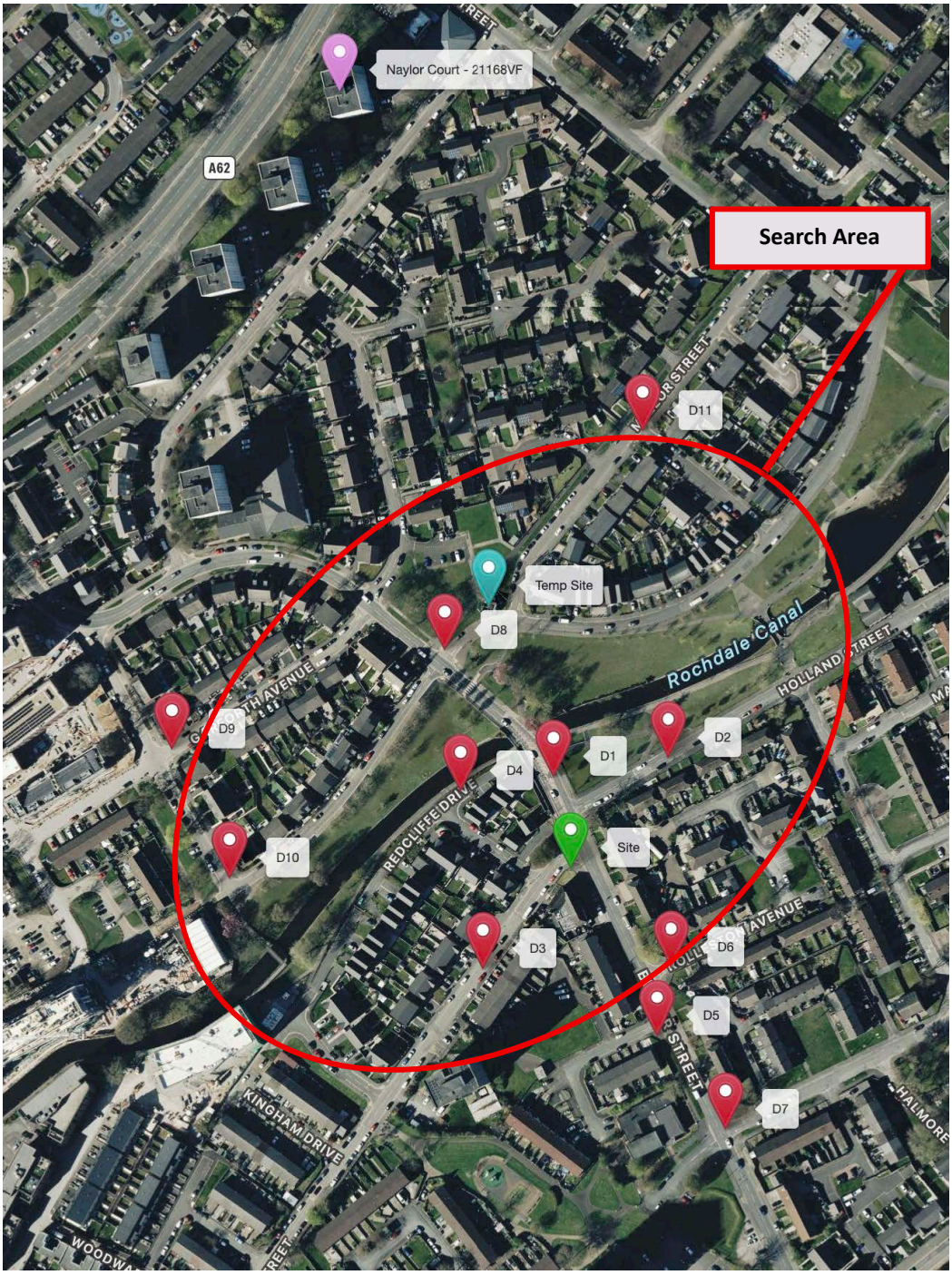


Fig. 5: Footway widths etc. 'Inclusive Mobility: A Guide to Best Practice'

*"Footways and footpaths should be made as wide as is practicable, but under normal circumstances, a width of **2000mm** is the minimum that should be provided, as this allows enough space for two wheelchair users to pass, even if they are using larger electric mobility scooters. If this is not feasible due to physical constraints, then a minimum width of **1500mm** could be regarded as the minimum acceptable under most circumstances, as this should enable a wheelchair user and a walker to pass each other. Where there is an obstacle, such as lamp columns, sign posts or electric vehicle charging points, the absolute minimum width should be **1000mm**, but the maximum length of such a restricted space should be **6 metres**."*

Fig. 6: Discounted Site Map



The information above and below clarifies the 'Search Area' parameters within which a site must be found and the various options that have been considered but discounted in favour of the nominated site. Please note that, given the urgent need and temporary nature of the proposed development, this alternative site information relates to street furniture sites on adopted highways land only as once planning consent has been achieved these can be implemented under the New Roads and Street Works Act 1991 which negates the need for negotiating a legal

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agreement to occupy the land. As such, not rooftop site options or ground-based development options on private land have been considered.

Please note that underground services reports can be supplied with any application that may follow, if considered necessary.

Site	Name/Address	NGR	Reason for discounting
Temp	Temporary base station site at Lower Vicker Street	385534, 399009	A temporary base station has been deployed at this site using Emergency Powers. However, the temporary nature of this infrastructure means that it is powered by an on-site generator and unfortunately the noise being generated is disturbing the amenity of this residential area. The continued use of this site is not sustainable.
D1	Street furniture development along Butler Street north	Various	One will note that in principle, both footways appear sufficiently wide enough to accommodate a street furniture solution without impeding safe pedestrian use. However, the presence of underground services, (evidence of which is clear in the presence of manhole covers, cabinetry and surface scarring), would prevent a viable development being taken forward as it would not be possible to deploy the necessary root foundation without conflict with these services. One will also appreciate that development upon bridges is not possible due to the structural implications for both the bridge and the development when trying to design a suitable foundation. Furthermore, from a planning perspective, development in this locate would be more exposed and elevated than the nominated site so impact upon amenity was considered to be greater.
D2	Street furniture development along Holland Street	Various	One will note that only the pavement on the southern side of the road is wide enough to accommodate a street furniture solution without impeding safe pedestrian use. However, the need to avoid conflict with the access points to the residential properties along with the presence of underground services, (evidence of which is clear in the presence of manhole covers and surface scarring), would prevent a viable development being taken forward as it would not be possible to deploy the necessary root foundation without conflict with these services. Even if these were surmountable issues, a development here would sit directly in front of and in closer proximity to residential frontages. Therefore, this site option was also considered less viable on planning merit.
D3	Street furniture development along Woodward Street	Various	One will note that in principle, both footways appear sufficiently wide enough to accommodate a street furniture solution without impeding safe pedestrian use. However, the need to avoid conflict with the access points to the residential properties on both sides of the road along with the presence of underground services, (evidence of which is clear in the presence of manhole covers and surface scarring), would prevent a viable development being taken forward as it would not be possible to deploy the necessary root foundation without conflict with these services.

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			Even if these siting issues were surmountable, a development here would sit directly in front of and in closer proximity to greater number of residential frontages, resulting in greater impact upon amenity. Therefore, this site option was also considered less viable on planning merit.
D4	Street furniture development along Danesdale Drive / Redcliffe Drive	Various	One will note that there are no footways along the main section of the road that runs parallel with the adjacent Rochdale Canal Towpath, which itself is not adopted highways, so development here would require negotiation of a legal agreement which is not viable for the short-term nature of the operational requirement. The sections of Danesdale Drive and Redcliffe Drive that join on to Woodward Street are not sufficiently wide enough to accommodate a street furniture solution without impeding safe pedestrian use. Furthermore, the need to avoid conflict with the access points to the residential properties on both sides of the road along with the presence of underground services, (evidence of which is clear in the presence of manhole covers and surface scarring), would prevent a viable development being taken forward as it would not be possible to deploy the necessary root foundation without conflict with these services. Even if these siting issues were surmountable, a development here would sit directly in front of and in closer proximity to greater number of residential frontages, resulting in greater impact upon amenity. Therefore, this site option was also considered less viable on planning merit.
D5	Street furniture development at Butler Street / Firbeck Drive junction	Various	The pavement is sufficiently wide enough to accommodate a street furniture solution at this junction, in principle. However, the presence of underground services, (evidence of which is clear in the presence of manhole covers, cabinetry and surface scarring), would prevent a viable development being taken forward as it would not be possible to deploy the necessary root foundation without conflict with these services unless the development was located centrally on the pavement. However, this would impede both pedestrian flow and visibility splays associated with the junction, which would not be acceptable from a highways and pedestrian safety perspective. Even if these siting issues were surmountable, a development here would sit directly in front of and in closer proximity to greater number of residential frontages, resulting in greater impact upon amenity. Therefore, this site option was also considered less viable on planning merit.
D6	Street furniture development at Butler Street /	Various	The pavement is sufficiently wide enough to accommodate a street furniture solution at this junction, in principle. However, the presence of underground services, (evidence of which is clear in the presence of manhole covers, cabinetry and surface scarring), would prevent a viable

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	Rolleston Avenue junction		development being taken forward as it would not be possible to deploy the necessary root foundation without conflict with these services unless the development was located centrally on the pavement. However, this would impede both pedestrian flow and visibility splays associated with the junction, which would not be acceptable from a highways and pedestrian safety perspective. One will also note that there are mature trees overhanging the pavement and development would require the pruning/cutting back of their canopy spread, which again is to be avoided where possible. Even if these siting issues were surmountable, a development here would sit directly in front of and in closer proximity to greater number of residential frontages, resulting in greater impact upon amenity. Therefore, this site option was also considered less viable on planning merit.
D7	Street furniture development along Butler Street south	Various	The majority of pavements along each side of the road are not sufficiently wide enough to accommodate a street furniture solution. Furthermore, the need to avoid conflict with the access points to the residential properties on both sides of the road along with the presence of underground services, (evidence of which is clear in the presence of manhole covers, cabinetry and surface scarring), would prevent a viable development being taken forward. Development must not impede the points of access to properties and it would not be possible to deploy the necessary root foundation without conflict with services unless the development was located centrally on the pavement. However, to do so would cause greater impediment to pedestrian flow and would not be acceptable from a highways and pedestrian safety perspective. One will also note that certain sections have mature trees overhanging the pavement and development in these locations would require the pruning/cutting back of their canopy spread, which again is to be avoided where possible. Even if these siting issues were surmountable, with residential properties lining both sides of the road, a development here would sit directly in front of and in closer proximity to greater number of residential frontages, resulting in greater impact upon amenity. Therefore, this site option was also considered less viable on planning merit.
D8	Street furniture development on pavements around Butler Street / Lower Vickers Street / Stephen Hunt Street	Various	One will note that the only sections of pavement wide enough to accommodate a street furniture solution at on either side of Lower Vicker Street. However, the presence of underground services, (evidence of which is clear in the presence of manhole covers and surface scarring), would prevent a viable development being taken forward as it would not be possible to deploy the necessary root foundation without conflict with these services unless the development was located centrally on the pavement. However, this would impede both pedestrian flow and visibility splays associated with the junction, which would not be acceptable from a highways and pedestrian safety perspective.

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D9	Street furniture development on Garforth Avenue / Rodney Street	Various	The majority of pavements along each side of the road are not sufficiently wide enough to accommodate a street furniture solution without impeding safe pedestrian access. It is also imperative that conflict with the access points to the residential properties on both sides of the road is avoided. Furthermore, the presence of underground services, (evidence of which is clear in the presence of manhole covers, cabinetry and surface scarring), would prevent a viable development being taken forward as it would not be possible to deploy the necessary root foundation without conflict with these services. One will also note that certain sections have mature trees overhanging the pavement and development in these locations would require the pruning/cutting back of their canopy spread, which again is to be avoided where possible. Even if these siting issues were surmountable, the area is more densely residential than the nominated site, so a development here would sit directly in front of and in closer proximity to greater number of residential frontages, resulting in greater impact upon amenity. Therefore, this site option was also considered less viable on planning merit.
D10	Street furniture development on Stephen Hunt Street	Various	The pavements along each side of the road are not sufficiently wide enough to accommodate a street furniture solution without impeding safe pedestrian access. It is also imperative that conflict with the access points to the residential properties on the north side of the road is avoided. One will also note that certain sections have mature trees overhanging the pavement and development in these locations would require the pruning/cutting back of their canopy spread, which again is to be avoided where possible.
D11	Street furniture development on Mellor Street	Various	The majority of pavements along each side of the road are not sufficiently wide enough to accommodate a street furniture solution without impeding safe pedestrian access. Those that are have underground services present, (evidence of which is clear in the presence of manhole covers, cabinetry and surface scarring), which would prevent a viable development being taken forward as it would not be possible to deploy the necessary root foundation without conflict with these services. These wider areas of pavement are also extremely exposed, and development here would have a greater impact upon general amenity.

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

Government Ambition and Legislative Reforms

It is important to consider this proposal in a wider context of National and Local Government ambition which clearly recognises the benefits that modern communications networks bring.

- **UK Government Resilience Action Plan, published July 2025**[8]

This publication includes reference to telecommunications as part of the Government's 'Critical Network Infrastructure' (CNI) stating that:

> *"The resilience of the UK's CNI is of central importance to ensuring that the essential services the public rely on continue to operate. Given the fundamental and connected nature of these services, failure has the potential to cause cascading and catastrophic consequences. This could be, for example, power outages impacting other essential functions, like transport or water provision, or a failure in the telecoms or data infrastructure sectors impacting the energy sector - across all four nations."*
>
> Paragraph 57

It also confirms that:

> *"…Telecoms is part of our CNI and underpins many, if not all, economic sectors…"*

- **UK Infrastructure: A 10 Year Strategy**[9]

Published in June 2025, and Presented to Parliament by the Chief Secretary to the Treasury by Command of His Majesty, the Strategy highlights the benefits of effective digital technologies in 'Chapter 3: Unlocking growth across regions' under the subheading 'Digital infrastructure for growth and innovation':

> *"Digital infrastructure supports productivity growth through lowering costs for firms, underpinning technological change, widening access to labour markets across the country and enabling new and innovative services to be provided.*
>
> *Digital infrastructure also increasingly underpins the provision of services critical for the functioning of society, business, and government – including the operation of other infrastructure sectors. In particular, demand for data centre services is projected to surge over the next decade including for AI development and deployment. The government is committed to facilitating the development and expansion of cutting-edge, secure, and sustainable digital infrastructure that meets the needs of both the private and public sectors."*

- **Labour Manifesto**[10]

The Manifesto included a section entitled 'Kickstart economic growth' within which the subsection 'Economic Infrastructure' referenced their views on modern communications as follows:

[8] https://www.gov.uk/government/publications/uk-government-resilience-action-plan
[9] https://www.gov.uk/government/publications/uk-infrastructure-a-10-year-strategy
[10] https://labour.org.uk/updates/stories/labour-manifesto-2024-sign-up/

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"In an ever more connected world, Britain's communication network is also vital. Under the Conservatives, investment in 5G is falling behind other countries and the rollout of gigabit broadband has been slow. Labour will make a renewed push to fulfil the ambition of full gigabit and national 5G coverage by 2030.

- **UK Wireless Infrastructure Strategy**[11]

The Strategy recognises the benefits that effective connectivity has brought to British households and business by boosting growth, productivity, and opportunity for all. Advanced wireless connectivity is heralded as the foundation on which to build industry, employment, skills and services for the future with 5G identified as being key to driving industry growth and improving public services and transport. Improving digital connectivity is also one of the government's Levelling Up Missions and aims for all places and communities across the UK to share in the benefits of good connectivity, enriching lives and driving local growth.

The document references the Prime Minister's 5 priorities for this government, i.e., to build a better, more secure, more prosperous future for the UK, including growing the economy, and creating better-paid jobs and opportunity right across the country, which this strategy is focused on delivering.

Chapter 5 of the Strategy deals specifically with 'Realising the benefits of 5G and advanced wireless connectivity' and states:

"5G and other forms of advanced wireless connectivity pave the way for new services and applications that can have a transformative effect on our public services, businesses and our local economies, delivering this government's priority of growing the economy and creating better paid jobs. Wireless connectivity can support mobile healthcare workers and connected vehicles, improve traffic flow through our cities and enable our factories to be more productive, supporting the fourth industrial revolution. Our evidence is clear that the most significant economic benefits from 5G will come from widespread adoption of advanced 5G by industrial sectors, including manufacturing and logistics, and by public services.

The government is determined that the UK should take full advantage of these opportunities…

We are therefore providing the framework to ensure that people, businesses and public services across the UK are able realise the full benefits of 5G and advanced wireless connectivity as soon as possible."

With regards to facilitating better connectivity at a local and regional level, Chapter 5 references the need for 'Local Leadership and Coordination' stating:

"Local leadership can help to identify and break down barriers to deployment at a local level by bringing together stakeholders across the public sector and building strong relationships with industry. The installation of telecoms infrastructure involves a number of different local government departments (such as planning, estates, highways) and their activities can be siloed and uncoordinated.

It is essential that, at a leadership level, local and regional authorities recognise the importance of wireless connectivity and identify decision-makers within the organisation who are empowered to facilitate private sector investment. By articulating the benefits of wireless infrastructure and connectivity and linking these to digital inclusion (and, in turn, tying these into local authorities' wider regeneration and growth or 'place' strategies) it can be viewed as an inward investment opportunity for places across the UK."

- **Ofcom Connected Nations Report 2025**[12]

[11] https://www.gov.uk/government/publications/uk-wireless-infrastructure-strategy/uk-wireless-infrastructure-strategy
[12] https://www.ofcom.org.uk/phones-and-broadband/coverage-and-speeds/connected-nations-20252

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The annual Connected Nations report measures progress on the availability of broadband and mobile services across the UK, including the newest full fibre, fixed wireless access and 5G networks now being rolled out.

The Report's section entitled 'Overview' confirms the following in relation to 5G coverage and data use:

- Mobile coverage continues to increase, with UK 5G coverage outside of premises from at least one operator now ranging between 94% and 97%...
- Mobile data use continues to rise, increasing by 18% over the past year...
- 5G traffic saw the largest growth…
- 4G remains the dominant mobile technology…

The Report's section entitled 'Mobile, data and voice' confirms that mobile connectivity plays a vital role in how people across the UK access services, communicate and stay connected and states the following under the subheading 'Highlights':

  - *"**5G Standalone (5G SA)** is now available across 83% of areas outside of premises in the UK, based on our High Confidence levels. This newer form of 5G is being rolled out alongside existing 5G non-standalone (5G NSA) services.*
  - ***Overall 5G coverage, which includes both 5G SA and 5G NSA, continues to expand.** 5G coverage outside of premises from at least one MNO now ranges between 94% and 97%, based on our Very High and High Confidence levels. Individual MNOs report 5G coverage outside of premises of between 64% and 89%, at our High Confidence level.*
  - ***4G coverage from at least one MNO now reaches 96% of the UK geographic landmass and extends beyond 99% of UK premises.** 4G continues to carry the largest share of mobile data traffic, accounting for 72% of the total monthly mobile data traffic. While it remains the most used mobile technology, its share is gradually declining, down by 6 percentage points from 2024, indicating a shift towards 5G.*
  - ***Monthly mobile data traffic increased by 18% over the past year to 1,257 petabytes (PB)**, a growth rate broadly consistent with the previous year.*
  - ***5G traffic saw the largest growth, rising from 227 PB to 348 PB, an increase of 53%.** Notably, 5G SA now accounts for approximately 31% of total 5G traffic, representing around 9% of overall mobile data traffic. This reflects a widespread transition by MNOs from NSA to SA networks.*
  - ***The transition away from older mobile technologies continues.** We expect all MNOs will have completed their 3G switch-off by the end of the year. All MNOs have committed to retiring their 2G networks by 2033 at the latest.*
  - ***The number of direct customers relying on 2G or 3G-only devices is approximately 2 million**, broadly similar to the 2.1 million reported in 2024."*

- **UK Digital Strategy Policy Paper[13]**

[13] https://www.gov.uk/government/publications/uks-digital-strategy/uk-digital-strategy

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The UK Government's Policy Paper was updated on 04 October 2022, within which 'Section 1 Digital Foundations' reiterates that digital infrastructure plays a vital role in the daily lives of modern society and is the foundation of a thriving digital economy. The Strategy confirms that every part of the UK needs world-class, secure digital infrastructure that enables people to access the connectivity and services they need, where they live, work or travel, and clearly states the ambition to supply the majority of the UK's population with access to 5G by 2027. The Strategy also highlights the fact that enhancing digital connectivity is 'Mission 4' of the Government's Levelling Up White Paper[14].

- **The Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2022[15]**

The reader will be aware that amended planning legislation was introduced on 04 April 2022 in the form of the above, which saw a relaxing of planning laws to facilitate Government ambition for all to have access to effective and UpToDate mobile communications services in recognition for the benefits that modern communications networks bring.

The 'Explanatory Memorandum' that accompanied this amendment confirms that:

> *"Permitted development rights have an important role to play in the planning system. They provide a more streamlined planning process with greater planning certainty, while at the same time allowing the local consideration of key planning matters through a light-touch prior approval process.*
>
> Policy Background, What is being done and why? Paragraph 7.1

> *It is essential that the planning system continues to effectively support the deployment of new mobile network infrastructure. The changes will provide Code Operators with flexibility to upgrade existing sites in England for 5G delivery, enhance coverage and meet growing demands for network capacity. They will also reduce the time, cost and uncertainty involved in upgrading mobile network infrastructure and encourage the use of existing infrastructure and promote site sharing to reduce the impacts of new deployment.*
>
> Policy Background, What is being done and why? Paragraph 7.3

> *Article 3(2)(a) of this Order alters the height limits for the deployment of new groundbased masts through permitted development rights. These changes permit the installation of new ground-based masts of up to 30 metres in height on unprotected land, and up to 25 metres on Article 2(3) land.[16] In both cases Code Operators would need prior approval from the local planning authority. These changes will reduce the number of new ground-based masts needed and will particularly support deployment of the Shared Rural Network, a programme to increase mobile network coverage throughout the UK.*
>
> New ground-based masts, Paragraph 7.16

- **Future Telecoms Infrastructure Review (FITR)[17]**

In 2018, the Department for Digital, Culture, Media and Sport published the FITR, outlining the Government's intent on being the best place to start and grow digital business with the aim of providing the majority of the population with 5G coverage by 2027. The FITR made it clear that 5G networks will deliver faster and better mobile broadband data services to consumers and businesses and will enable innovative new services for industry sectors, including manufacturing, transport, immersive technologies and healthcare.

[14] https://www.gov.uk/government/publications/levelling-up-the-united-kingdom
[15] https://www.legislation.gov.uk/uksi/2022/278/contents/made
[16] Please note that A1(1)(c) of the GPDO also limits the height of new ground based masts on highways land to 25m
[17] https://www.gov.uk/government/publications/future-telecoms-infrastructure-review

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- **The Electronic Communications Code 2017**[18]

Government ambition and recognition for the benefits that modern communications networks bring is also clearly evident in the publication of this document which has made it easier for network operators to install and maintain apparatus, such as phone masts, exchanges and cabinets, on public and private land with Part 4, Paragraph 20, providing a mechanism for the courts to impose terms of occupation on a landowner and the Operator or infrastructure provider. Further amendments to this Code are imminent, to help streamline the acquisition process and clarify relationships between infrastructure providers and site owners.

Regional government ambition

- **Greater Manchester Combined Authority (GMCA) Digital Blueprint**[19]

Originally launched in February 2020, the GMCA refreshed the Greater Manchester's Digital Blueprint in May 2023, identifying five digital priorities and four key strategic enablers, developed in collaboration with stakeholders from across Greater Manchester's digital sector, sharing strategic commitments to put people, environment, and place firmly at the heart of its plans.

The priorities are listed as:

- Empowering people and communities
  Ensuring everyone in the GM area can safely access and benefit from digital opportunity
- Building responsible, data driven public service
  Reforming and renewing public services with the needs of GM
- Digitally enabling a resilient and prosperous economy
  Enabling businesses to use technology better and support its creation and scaling of digital organisations
- Creating connected, inclusive, sustainable places
  Building out world class digital infrastructure, creating resilient, connected, accessible and sustainable places for everyone
- Strengthening our position as a global digital influencer
  For GM to be further acknowledged as a global centre of digital innovation, research and practice

The strategic enablers are listed as:

- Building digital skills and literacy for life, education, work and business
- Strengthening digital talent pipeline
- Extending world class digital infrastructure, technology and data
- Harnessing academia, testbeds and research

The above demonstrates the Government's recognition of the increasing importance of reliable connectivity now and in the future and they set the scene in which Decision Makers must determine telecommunications

[18] https://www.ofcom.org.uk/phones-telecoms-and-internet/information-for-industry/policy/electronic-comm-code
[19] https://www.greatermanchester-ca.gov.uk/what-we-do/digital/

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applications, particularly in cases such as this where operators are seeking to prevent a loss of network services for their customers.

- **Greater Manchester Combined Authority (GMCA) Local Industrial Strategy 2019[20]**

The Executive Summary of the Strategy states:

> *"Greater Manchester's ambitious Local Industrial Strategy is designed to deliver an economy fit for the future, with prosperous communities across the city-region and radically increased productivity and earning power."*

The strategy references an aim to harness digital transformation to create better quality, future-facing jobs in all sectors of the economy, enabling the digitalisation of all sectors and capitalising on the links between digital and creative industries that feed internationally significant clusters in broadcasting, content creation and media, and maximising growing assets in cyber security.

It also acknowledges the benefits associated with clean and inclusive growth facilitated by digital connectivity, digital mobility solutions, and the need to meet nationwide targets on the roll out of 5G. Further to this, there is an aspiration to become the best-connected city-region in the UK and to be a top five city-region for digital economy in Europe.

- **Greater Manchester Combined Authority (GMCA) Infrastructure Framework 2040[21]**

The Executive Summary of the Framework states:

> *"Greater Manchester has experienced major change over the past decades, and this is anticipated to continue, if not accelerate, in the future – particularly as a result of population and employment growth, environmental & climate change and technological advances. All of these changes have the potential to impact on Greater Manchester's infrastructure, which supports the residents, communities, environment and local economy of the City Region."*

The Framework references three key trends, namely:

- Population and Employment
- The Environment and Climate Change
- Technological, Digitalisation and Wider Changes

With regards to digital communications, the Framework acknowledges that:

> *"Digital technology is increasingly the backbone of the major industries and our daily lives. Approaching 2040, GM will need to be a smart and digitally ready City Region. To achieve this, and support on-going digitalisation, the region will require resilient fixed connectivity (through full fibre) supported by 5G (and subsequent technologies)."*

And goes on to state:

[20] https://www.greatermanchester-ca.gov.uk/what-we-do/economy/greater-manchester-s-local-industrial-strategy/
[21] https://www.greatermanchester-ca.gov.uk/media/1715/greater-manchester-infrastructure-framework-2040.pdf

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> *"Over the years approaching 2040, GM will move to become a smart and digitally-ready city region. To achieve this vision, the future digital infrastructure will require strong fixed resilience connectivity, supported by 5G (and beyond), big data systems and other nascent technologies such as Artificial Intelligence and machine learning. Without connectivity, processing the sheer volumes of data necessary to create a network of communicating devices will be impossible. As such, significant improvements are required to increase the provision of wired (through full fibre to the premises) and wireless (through 5G, or subsequent technologies, and wifi provision) across Greater Manchester. Without the more basic technology solutions (such as pervasive fibre connectivity and 5G), the smartregion solutions and value-added outcomes will struggle to be brought to fruition."*

The document also acknowledges that GMCA and the Districts, in conjunction with the digital and telecommunications providers, need drive forward opportunities to promote connectivity and uptake in the regional centre, referencing the Vodafone's 5G trial in Salford Quays which commenced operation in 2018, before the technology was rolled out in any other place in the UK.

Other

- **Times Article, Prime Minister Comments**

On 05 December 2024, the Prime Minister, Sir Keir Starmer, was quoted in an article in The Times, confirming that housing needs to be supported by good infrastructure, stating:

> *"Every road, pylon and mast – which connect people with opportunity – must jump through endless hoops, only to be opposed, dragged out, before eventually, if lucky, approved…"*

- **Department for Science, Innovation & Technology's Minister of State letter to Council Leaders**

On 29 November 2024, the Minister of State, Chris Bryant MP, wrote a letter to Council Leaders, urging support for digital infrastructure deployment and collaboration with mobile network operators, stating:

> *"The Government is committed to supporting the delivery of next-generation connectivity to communities across the UK by driving towards nationwide gigabit broadband and 5G coverage by 2030.*
>
> *We need your help to achieve these goals. Broadband and mobile rollout rely heavily on local authorities prioritising digital infrastructure and placing it at the heart of their wider Place strategy. I am writing to you today to highlight a number of areas that remain a challenge, and how they can be approached to boost telecoms investment in your area."*

Summary

Each of the above demonstrates the governmental recognition of the increasing importance of reliable connectivity now and in the future and they set the scene in which Decision Makers must determine telecommunications applications, particularly in areas where coverage and capacity issues are being experienced, as is the case in this instance.

It is also clear from the above that the preceding and current UK Governments have both placed an onus on Planning system reform to drive the economy with the 2022 revision to the GPDO having relaxed planning laws and increased permitted development rights in favour of the roll out of digital infrastructure, helping to facilitate access to effective communications networks for all.

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The 2024 revision to the NPPF then also explicitly references Digital Infrastructure in the chapter related to 'Building a Strong, Competitive, Economy' and one will also note that the publication of the 10 Year Strategy commits to a 'Call for Evidence' on legislation related to streamlining the delivery of digital infrastructure, given the socio-economic benefits attached.

Part of the above call for evidence is the publication on 18 December 2025 consultation on 'Reforming planning rules to accelerate deployment of digital infrastructure'. The consultation seeks evidence and views from stakeholders to inform decisions on whether, and how, to reform specific planning rules and update policy guidance so that digital infrastructure can be delivered more quickly, to help improve coverage nationwide, so that communities up and down the country can enjoy the benefits that connectivity can bring.

The consultation reiterates that delivering high-quality digital infrastructure is essential to the UK's growth, productivity and the resilience of public services. It notes that the adoption of 5G across key sectors could unlock between billions of pounds in additional Gross Value Added annually by 2035 and highlights that reliable fixed and mobile connectivity underpins innovation across sectors—from advanced manufacturing and logistics to health, emergency services and smart energy systems—and is now an expectation for many businesses and communities up and down the country. It supports the adoption of new and emerging technologies including Artificial Intelligence (AI) 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. The government is committed to the rollout of gigabit-capable broadband and modern 5G networks, with the 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.

In addition, the 2025 Resilience Action Plan then also adds further weight to the argument by reiterating that telecommunications are 'Critical National Infrastructure' that is integral to many, if not all, economic sectors. These governmental aspirations are undeniable.

Planning Policy and Other Material Planning Considerations

When considering the appropriateness of the proposal, it is imperative that decision maker give material weight to telecommunications specific policy where it exists. If it does not exist at a local level, or if the policy is out of date, then the NPPF must prevail. One must also appreciate that it is extremely unreasonable to expect niche infrastructural development, such as that proposed development, to strictly adhere to more general policy criteria. Furthermore, it is a material consideration to recognise the planning application type as the proposal benefits from permitted development subject to a prior approval determination.

Prior Approval Mechanism

The Prior Approval system has been long since used to facilitate telecommunications development, in which in more recent times the UK Government have introduced the Prior Approval process as part of its broader planning reforms to streamline working practices, reduce bureaucracy, and encourage growth, especially in housing and renewable sectors. Therefore, it must be remembered in this case that the principle of development has already been established by National Government when the current permitted development rights contained within Part 16 of the Order which were last updated and came into force in April 2022. This statutory legislation necessitates that when a telecoms proposal falls with the limits of PDRs, it results in the requirement for a prior approval application and an assessment by the determining body relating to matters of siting and appearance only.

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A prior approval is not like a planning application and The Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government have published updated guidance on the matter in July 2023, entitled 'When is permission required?'[22]

Under the sub-heading 'Is a prior approval application like a planning application?', the guidance states:

> *"The statutory requirements relating to prior approval are much less prescriptive than those relating to planning applications. This is deliberate, as prior approval is a light-touch process which applies where the principle of the development has already been established. Where no specific procedure is provided in the General Permitted Development Order, local planning authorities have discretion as to what processes they put in place. It is important that a local planning authority does not impose unnecessarily onerous requirements on developers, and does not seek to replicate the planning application system."*
>
> *Paragraph: 028 Reference ID: 13-028-20140306*

We would reiterate that permitted development rights allow the MNOs to deploy communication apparatus, such as the development proposed, within certain size restrictions and subject to the prior approval of the Council, i.e. there is a 30m high mast threshold for development, (25m on Article 2(3) land or highway land), under the changes to the prior approval process, in which clearly this proposal at 20m to top falls well below this upper threshold.

National Planning Policy Framework (NPPF) December 2024[23]

The NPPF recognises the role that modern communications systems must play in achieving sustainable economic growth and provides a set of national planning objectives which are designed to support growth, protect the environment and ensure decisions are made at a local level. It encourages a more positive approach to how LPAs view development proposals with an emphasis on the important benefits modern communications bring, for example helping to achieve sustainable economic growth and the need for access to high quality mobile services in all areas, both urban and rural.

Section 10 of the NPPF is entitled "Supporting High Quality Communications" and reiterates in paragraph 119 that:

- 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)

Paragraph 120 advocates that:

- Site/mast sharing be encouraged; and
- New sites should be carefully designed using camouflage techniques where necessary and possible

Paragraph 121 then goes on to highlight that LPAs:

- Should not impose unnecessary restrictions on telecommunications development
- Should reassure themselves that no impact upon other electrical equipment or instrumentation will occur
- Should consider the possibility of the construction of new buildings or other structures interfering with broadcast or other electronic communications

[22] https://www.gov.uk/guidance/when-is-permission-required
[23] https://assets.publishing.service.gov.uk/media/669a25e9a3c2a28abb50d2b4/NPPF_December_2023.pdf

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Paragraph 122 requires that applications be supported by appropriate justification including consultation with educational establishments or safeguarding bodies and via the provision of an ICNIRP certificate.

Paragraph 123 also places an emphasis on the fact that LPAs must determine applications for communications infrastructure on planning grounds alone.

Other relevant Sections from the NPPF are outlined below:

- Section 2's 'Achieving Sustainable Development', promotes sustainable development via the support for economic, social and environmental objectives
- Section 4's 'Decision Making', confirms the need for LPAs to approach decisions on proposed developments in a positive and proactive way, seeking to approve applications for sustainable development where possible.
- Section 6's 'Building a strong, competitive economy', outlines the need to support economic growth referring specifically to digital infrastructure and highlighting the need to appreciate specific locational requirements; a matter that is which is very relevant to communications development which is based upon very specific geographical necessities. With modern technologies, coverage requirements must be addressed from within or extremely close to the target area.

Code of Practice for Wireless Network Development in England[24]

This document, known as 'the Code', provides guidance to Code Operators (referred to as 'operators' throughout the Code of Practice), including the Mobile Network Operators and wireless infrastructure providers, their agents and contractors, local planning authorities, and all other relevant stakeholders in England on how to carry out their roles and responsibilities when acquiring the land for and installing wireless network infrastructure. It is also a useful tool for other interested stakeholders such as community groups, amenity bodies and individuals with an interest in mobile connectivity.

The current Code of Practice builds upon the aims of that which it replaced, i.e., the Code of Best Practice 2016, 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.

Although led by the Department for Digital, Culture, Media and Sport (DCMS), this Code of Practice has been developed in collaboration with representatives of the mobile network industry, other government departments and public bodies, local planning authorities, and protected landscapes.

The document outlines the Legal and Policy frameworks within which the document has been produced and reiterates the following:

> *"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."*
>
> Paragraphs 8 and 9

[24] https://www.gov.uk/government/publications/code-of-practice-for-wireless-network-development-in-england

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It is also important to note the Code states that:

> *"Section 10 of the NPPF sets out the planning policies for communications development in England, and states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. The NPPF also sets out that planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technologies (such as 5G). Other sections of the NPPF set out how these policies should be balanced with other considerations, including conserving and enhancing the natural environment and historic environment."*
>
> Paragraph 15

With regards to how wireless networks function, and with specific reference to 5G, the Code states that:

> *"Wireless technology continues to evolve rapidly, and mobile devices are now capable of much more. Second generation (2G) technology gave us voice calls and text messages, 3G led to the launch of smartphones, and 4G, which enabled faster browsing, allowed us to do things like watching videos on the move. 5G, the latest generation of wireless technology, is much faster than previous generations of wireless technology and can offer greater capacity and lower latency, allowing thousands of devices in a small area to be connected at the same time. 5G networks, and future mobile generations, will be vital for a range of Internet of Things uses (IoT) and Smart City applications."*
>
> Paragraph 17

The Code also outlines its 'Principles and Commitment' as follows:

> *"Operators should develop their networks and install wireless infrastructure according to the following principles and commitments:*
>
> - *Site sharing and use of existing infrastructure: make use of existing structures, sites and masts wherever possible to reduce the need for new development. The NPPF states that, when installing mobile infrastructure, the number of masts and sites 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.*
> - *Consultation with local planning authorities, local communities and other stakeholders: participate in dialogue with local planning authorities, along with other relevant stakeholders such as the highways authorities, Area of Outstanding Natural Beauty bodies, Historic England, and Natural England, including pre-application discussions, where appropriate. Maintain clear procedures, and high-quality communication and consultation with local communities and other interested parties. Operators should agree community engagement with local planning authorities and share information as appropriate (see pre-application consultation with local communities below).*
> - *Standardised and high-quality approach to planning applications, and the notification procedure: provide standardised supporting documentation for planning applications (where appropriate) within the context of national and local requirements. Ensure planning submissions are of high-quality and provide the necessary evidence to support the application (as per the NPPF).*
> - *Prompt responses to enquiries: respond to complaints and enquiries within a timely manner (see Review and Enquiries section below).*
> - *Siting and Design: wireless infrastructure should be deployed in accordance with the guidance set out within this Code of Practice. Where appropriate, equipment should comply with the principles set out in the NPPF and consider any local planning policies, including any local and national design codes. When located in protected landscapes and other designated land, the sensitive nature of these areas must be considered.*

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- *Removal of redundant equipment and site restoration: ensure that when infrastructure is upgraded, any equipment that is made redundant by the upgrade, such as brackets, is removed to benefit the local environment. Where a whole site is no longer in use, the site should be restored to its original state.*
- *Compliance with guidance laid out in the International Commission on Non Ionizing Radiation Protection (ICNIRP) public exposure levels guidance: as required by spectrum licences, comply with international guidelines for limiting exposure to electromagnetic fields (EMF) – including, as set out in the NPPF, providing a statement that self-certifies that ICNIRP guidelines will be met with all applications (see Annex C).”*

Paragraph 18

Equally importantly, the current Code outlines the role of the Local Planning Authority stating:

“Local planning authorities should support the deployment of digital infrastructure by:

- *Incentivising connectivity: support the expansion of telecommunications networks, and take a ‘joined-up’ approach to the wireless infrastructure planning process, including ensuring that Local Plans effectively support the deployment of digital infrastructure.*
- *Facilitating sites: engage with operators when new sites have been proposed and discuss site requirements.*
- *Engagement with operators: respond positively to requests for engagement and make decisions in line with national policy and Local Plans. For planning applications, find solutions to issues and ensure timely decisions are made.*

Information and communication: ensure that members of the public can access information about any development proposals within their local area. Send communications promptly to an appropriate operator contact (or their representatives).”

Paragraph 19

On the issue of site selection, the Code states the following:

“Planning authorities should consider… the need for a site within a limited search area alongside the public benefit of improved connectivity. In general, it should not, therefore, be appropriate for planning authorities to seek wider evidence of alternative sites (beyond that required by the NPPF), unless they consider the proposed development is unacceptable having regard to the relevant material planning considerations.”

Paragraph 27

On the matter of ‘Design’ paragraphs 28 and 29 outline the following design principles:

“The siting of wireless infrastructure will influence which design options are most appropriate for reducing the visual impact. The following design principles are important considerations:

- *Protecting visual amenity: a comprehensive assessment of the area should be carried out to ensure that the design solution appreciates the context of its location by fitting with both the site and the wider setting. Proposals should take into account protected sightlines, landmarks and vistas. This is particularly important when mobile infrastructure is located in protected landscapes or heritage sites and their settings (see ‘Natural Environment and Heritage Assets’ section below).*

- *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. Operators should also consider the design principles set out in the NPPF and local planning policies, and consider any relevant local and national design codes.*

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

- *In urban areas, where there is a high level of demand for mobile data, mobile base stations area likely to need to be deployed more densely. In these settings you can expect to see more use of streetwork monopoles and rooftop installations…"*

Paragraphs 28 and 29

The Code's subsection entitled 'Technical and operational considerations confirms that there are 3No. 'primary technical and operational considerations for sites, i.e.:

- They must supply appropriate coverage to the intended area
- They must offer sufficient capacity to meet demand; and
- They must be able to connect into the wider network

And with regards to '5G network development considerations' the Code reiterates that:

"…5G installations will be more constrained and guided by these special technical and operational considerations."

Paragraph 66

Regional Planning Policy

- **Places for Everyone Joint Development Plan, adopted 21 March 2024[25]**

This is a joint Development Plan Document produced by the Greater Manchester Combined Authority on behalf of the nine Greater Manchester districts (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan).

The plan sets out the kind of development that takes place across the city-region stating that it:

- *"maximises the use of brownfield land and urban spaces*
- *protects green belt land from the risk of unplanned development*
- *releases some sites for housing and employment in key locations*
- *ensures we integrate all new developments into Greater Manchester's transport network. Otherwise, new roads and transport will support them"*

The document highlights the need for the Greater Manchester area to be a place where everyone is connected socially, digitally and by a clean, integrated and accessible transport system and proposes that the boroughs be places where everyone can access the employment, culture, leisure and services that they require through high quality digital communications. Indeed, digital infrastructure is seen as a facilitator of economic growth with 'Objective 9' reiterating the need to ensure that improved network capacity and coverage exist. Furthermore, with regards to 'long-term economic growth' the plan proposes the creation of a digital-enabled, green city region.

The document contains a section entitled 'Connected Places' within which it states:

[25] https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/strategic-planning/places-for-everyone/

> *"Historically, connectivity has been primarily about transport, but increasingly digital connectivity is fundamental to our lives, enabling us to connect with people irrespective of location, and to access an unparalleled range of learning, employment and retail opportunities."*
>
> Paragraph 10.3

Before going on to state:

> *"…the rapid rise in digital demand seems likely to continue, with more services being delivered digitally and ever-increasing data transfers requiring faster, higher-capacity broadband and mobile connections. As the Plan area becomes 'smarter' – utilising data to deliver services more swiftly and efficiently and adopting innovation such as connected and autonomous vehicles, artificial intelligence and the Internet of Things (where an increasing range of everyday devices are connected, monitored and operated via the internet) – travel patterns will change and digital will increase in importance. As stated in Our People, Our Place: The Greater Manchester Strategy, it is ultimately our ambition for the city-region to be the UK's leading digital city and one of Europe's top five."*
>
> Paragraph 10.21

This section also includes a sub-section specifically on 'Digital Connectivity' which acknowledges the importance of this and its constant advancement in modern society, especially with regards to business and social inclusion, and reducing the need to travel, by stating:

> *"Improving digital infrastructure and ensuring that new development is connected to it is therefore a high priority. The development industry has a significant role in enabling this priority, as well as benefiting from it. It will be important to accelerate the delivery of full fibre gigabit-capable networks and to be at the forefront of the roll-out of next generation mobile technology. 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.'*

The document also includes the following specific policy:

> *'Policy JP-C2 Digital Connectivity*
>
> *We support the provision of affordable, high quality, digital infrastructure. Developers are expected to work and share costs with telecoms operators as appropriate to maximise coverage and enable consumers to make informed choices. It is expected that internet connections will work immediately when residents move into new properties.*
>
> *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;*
> 2. *Requiring all new development to have full fibre to premises connections, unless technically infeasible, and to incorporate multiple-ducting compliant with telecoms standards, to facilitate future-proof gigabit-capable network connections; and*
> 3. *Facilitating the provision of free, secure, high speed public wi-fi connections, particularly in the most frequented areas.'*

Other policies that are considered to be relevant are listed as follows:

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- Policy JP-S1 Sustainable Development
- Policy JP-J1 Supporting Long-Term Economic Growth
- Policy JP-P1 Sustainable Places

Local Planning Policy[26]

The Council's Local Plan is in place to guide development within Manchester and consists of the following:

- Places for Everyone Joint Development Plan
- Core Strategy
- Interactive Proposals Map
- Extant Unitary Development Plan policies
- Greater Manchester Joint Waste DPD
- Greater Manchester Joint Mineral DPD

The relevant policies from within these documents are listed below:

The Adopted Core Strategy for the City of Manchester

- Policy DM1 (Development Management) states that all development should have regard to a number of specific issues the following of which are relevant to this application including:
    - Impact on the surrounding areas in terms of the design, scale, and appearance of the proposed development.
    - Development should have regard to the character of the surrounding area.
    - Effects on amenity, including privacy, light, noise, vibration, air quality and road safety and traffic generation. This could also include proposals which would be sensitive to existing environmental conditions, such as noise.
    - Accessibility: buildings and neighbourhoods fully accessible to disabled people, access to new development by sustainable transport modes.
    - Community safety and prevention.
    - Design for health.

- Policy SP1 (Spatial Principles) refers to the key spatial principles which will guide the strategic development of Manchester together with core development principles. It is stated that developments in all parts of the city should create well designed places which enhance or create character, make a positive contribution to the health, safety, and well-being of residents, consider the needs of all members of the community, and protect and enhance the built environment. Further, development should seek to improve access to jobs, services and open space, and provide good access to sustainable transport provision.

The Unitary Development Plan (UDP) for the City of Manchester (1995)

- Policy DC17.1 (Telecommunications) states that applications for telecommunications developments will normally be approved if the Council can be satisfied that the development has been sited and designed to minimise its impact on residential amenity and in environmentally sensitive areas. Wherever possible, the Council will expect the potential of existing buildings and masts, including the sharing of such facilities, to be fully explored before agreeing to additional separate development.

[26] https://www.manchester.gov.uk/planning-and-regeneration/planning/local-plan

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Planning Summary

A summary as to why the subject proposal adheres to all relevant policy criteria is outlined below:

- Legislative context
  We have already established that Part 16 of the GPDO ratifies that prior approval applications benefit from permitted development rights and are therefore accepted in principle by virtue of the legislation. We would reiterate that permitted development rights allow the MNOs to deploy communication apparatus, such as the development proposed, within certain size restrictions and subject to the prior approval of the Council, i.e., there is a 30m mast height threshold. This proposal is for a 20m high mast, which is 33% under the standard threshold and 20% under that for highways land.

  This prior approval relates to only the siting and appearance, nothing else can be taken into account. A Prior Approval application must be considered with a lighter touch when compared with a Full Planning Application. They are, after all, much less prescriptive with far fewer legal elements than those associated with a full planning application, i.e.:

  - the planning unit does not need defined with a red edged location plan
  - the application does not need to conform to both national and local validation requirements in order to be registered; and
  - dischargeable conditions cannot be attached.

  The Prior Approval procedure is akin to the grant of outline planning permission with the precise siting and detailed appearance of the apparatus reserved. The principle of the development is therefore approved under the provisions of the GPDO, and the determination must be confined to siting and appearance.

- Operational Requirement
  There is a clear operational need for the development which has been devised by Cornerstone, on behalf of VodafoneThree to provide a 3year temporary solution for replacement network coverage and capacity in an area that is not currently benefitting from UpToDate coverage and/or satisfactory capacity and that would face a complete loss of coverage if the existing temporary mast were to be removed. The intent is that the proposed infrastructure will supply multigenerational (inc. 5G) services technologies to the area and to the benefit of approximately 31% of the population/community, who according to recent figures are VodafoneThree customers.

- Siting
  The siting of any new base station development is directly linked to operational need. A sequential approach to site selection has preceded the nomination of this site and further details have been supplied above. Given the nature of the temporary coverage requirement and the lengthy nature of negotiating land rights for occupying property or buildings, the applicant has been left with no alternative but to seek to deploy a temporary replacement base station incorporating a ground-based mast on adopted highways land and within the area it is to serve. Much of the target area is in residential use and therefore development in such context is unavoidable. However, every effort has been made to identify a site that limits impact upon both residential and general amenity.

  The nominated site is offset from as many direct residential vistas as possible and is not subject to any built and natural heritage designations, making best use of existing features for backdrop and context purposes. We contend that a balance between planning and operational considerations has been struck, with the list of alternative sites provided confirming that no less harmful or more appropriate site is available. That

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said, any alternative site suggestion that any interested party wishes to make will be gratefully received and investigated.

Please also note that the alternative site assessment criteria outlined by the NPPF in Paragraphs 120 and 122, have been met and exceeded. Afterall, the NPPF places no obligation on the developer to identify the 'ideal' site but rather advocates that they undertake an alternative site assessment that includes consideration for the use of existing masts, buildings and other structures stating:

> *"…for a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure and a statement that self-certifies that, when operational, International Commission guidelines will be met."*
>
> Paragraph 122c, NPPF

The Council must appreciate that every possible location does not need to be robustly demonstrated as unviable for use and that applicants do not need to provide absolute proof that no less sensitive location is available for the base station to be sited. To expect so would mean the LPA are clearly misinterpreting what the NPPF requires, i.e., the provision of evidence that existing buildings/masts or other structures have been explored. There can be no doubt that alternative site options have been thoroughly investigated by Cornerstone and the operator and if the technical experts suggest that a site is unviable due to a construction issue or limited operational merit, then this should not be challenged.

Further to the above, a recent High Court judgement confirms that alternatives which have "*no real possibility of coming about*" may properly be given little or no weight (R (Save Smallbrook) v Birmingham City Council [2024] EWHC 2535 (Admin)). The Judicial Review Decision states:

> *"41. There is no general principle of law that the existence of alternative schemes is inevitably a mandatory material consideration in any case, even where the proposed development would cause adverse effects, but these are held to be outweighed by its beneficial effects: see R(CPRE) v Secretary of State for Transport [2023] EWHC 2917 (Admin) at [65].*
>
> *42. Even where alternatives might be relevant, "vague or inchoate schemes, or which have no real possibility of coming about, are either irrelevant or, where relevant, should be given little or no weight": see R (Save Stonehenge) v Secretary of State for Transport [2022] PGSR 74, at [270]."*

- Appearance

  Similar to siting requirements, the design of any new base station development is directly linked to operational need. It also has to be tailored to the bespoke nature of the site in question, i.e., with consideration in a context of topography, proximity to other natural and manmade features, planning policy and other local sensitivities. It must also be structurally capable of accommodating the necessary transmission apparatus at the required height.

  Following the nomination of the subject site, a well-considered design process has been implemented with the applicant having to balance technical requirements with the minimisation of visual impact. We have established that the number of antennas is directly linked to the operational brief and it is imperative that they 'see' the area they are to serve and are able to transmit without infringement by surrounding clutter. This is especially important with regards to 5G technologies which operate in higher frequency bands than older technologies and therefore attenuation of the radio signal is naturally higher and more prone to the effects of clutter. This means that operators will often require a higher structure or antenna position to achieve the same degree of coverage footprint as preceding generations.

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In this instance a top of 5G antenna height of 20m has been deemed necessary for effective operation and the only viable design option for a site on a roadside footway such as that which has been nominated is a street furniture style mast with standard cabinetry and ancillary development. Furthermore, street furniture masts are the slimmest available within the Cornerstone design portfolio and are readily accepted throughout the UK as the most appropriate design solution for urban/suburban locations, including the wider locale, so the proposed design will also ensure that visual impact is kept to an operational minimum.

As has also been indicated earlier in this statement, the Cornerstone design portfolio no longer includes a 'camouflaged' design option, as the bigger equipment required for the latest 4G and 5G technologies require a more robust structure which in turn makes effective disguise a difficult task. In addition, the shrouding of 5G antennas seriously reduces their effectiveness, hence why no shrouding is included in the proposal.

With regards to the colour scheme, a grey mast and cabinetry is proposed as this was considered best for assimilating within the streetscene, its features and any views that may be afforded against the predominantly grey/cloudy skyline. However, the applicant would be happy to consider any alternative colour scheme that the LPA may wish to suggest.

- Impact upon amenity

Cornerstone has made every effort to ensure that all elements of the final proposal have been limited to an absolute operational minimum in terms of both size and amount for the provision of an effective coverage and capacity solution to deliver reliable digital mobile connectivity to the area. Whilst some impact upon general amenity will occur as a result of introducing a new mast to any landscape or street scene, this has been limited through sensitive siting and design procedures and any limited harm that may occur is considered to be localised, acceptable and temporary, and is well outweighed by benefit and operational justification.

Although development in some form of context with residential properties is unavoidable, the site offers visibility to a very small number of dwellings. Any available and operationally viable alternative site would bring the development into much greater conflict with residential vistas, which would be more harmful to amenity.

With regards to impact upon the public domain, the main opportunity to view the development clearly will be when using the adjacent road or footway network but again the context and backdrop of mature vegetation, street furniture and nearby buildings along with the proposed colour scheme of the apparatus all provide mitigation. It must also be acknowledged that none of these vistas are considered to be overly sensitive and again impact will be limited and acceptable with those using the road and footway networks doing so on a temporary basis and with their perspectives on the development constantly changing as they travel through the area.

Decision Makers must therefore acknowledge the fact that mobile telecommunications base stations, like street lighting, signage, bus stops, gas, electricity, water and any other utilities/infrastructural elements, are integral pieces of infrastructure upon which, now more than ever, our society is heavily dependent. It would, therefore, be wholly wrong to suggest that a base station development is an 'alien' feature in any modern environment.

- Weighing up Harm versus Benefit and Need

As outlined above, the proposed essential infrastructure will allow local residents, businesses and visitors in the locale to access the many social and economic benefits associated with modern communications network services, preventing a complete loss of services in the area.

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High quality and reliable communications infrastructure are essential for economic growth and social well-being and the demand for mobile data in the UK is increasing rapidly as households and businesses become increasingly reliant on mobile connectivity. The infrastructure must therefore be in place to ensure supply does not become a constraint on future demand.

There should be no doubt that the Government fully supports the development high quality communications infrastructure and decision makers must appreciate that the NPPF advocates that local planning authorities should also support the expansion of electronic communications networks where impact is deemed to be acceptable or outweighed by benefit. We contend that the impact that will occur as a result of this essential infrastructure being deployed on site is considered to be acceptable, justified and outweighed by the many benefits of providing an effective modern communications service.

To further support this argument, we would refer the reader to the following appeal decisions where the Inspector has heavily weighed the need to ensure coverage is maintained / enhanced against any perceived visual harm.

- PINS ref: 3197522: Andover Road, Winchester
  The Inspector suggested that significant weight should be placed on NTQ replacement sites, stating:

  "I attach significant weight to the public benefit arising from the continuation of local service provision… Having regard to all relevant considerations, including national planning policy and the potential availability of alternative sites, my findings are that the proposal's public benefit in maintaining and enhancing local telecommunications coverage and capacity would outweigh the limited harm arising to the character and appearance of the area."

- PINS ref: 3287882: High Road, Weald Lane
  The Inspector took a similar approach to the above, stating:

  "I have also found that there is a clear need for the development in this location in order to sustain and enhance communications infrastructure within the area. The evidence before me indicates that there is a lack of reasonable alternative sites within the area which would provide the required coverage. I am also convinced that, should the proposal not go ahead and the existing equipment be removed, the quality of communications services within the area would be seriously deficient. I also recognise the benefits associated with improved communications infrastructure within the area which would not otherwise be achieved… in my view, and with regard to the specific circumstances which are present in this case, the benefits of the scheme would outweigh the harm which would be caused to the character and appearance of the area."

- PINS ref: 6002827: Addison Crescent, Trafford
  In this example, the Inspector comments that:

  "The Framework states that decisions should support the expansion of electronic communications networks, including next generation mobile technology, such as 5G. The operator previously provided coverage from a shared base station site at a multi-storey car park at Nuttal Street, but a 'Notice to Quit' has been served.

  …based on my observations and the evidence, I am satisfied that there are no realistic opportunities to erect antennas on existing buildings, masts or other structures. The site selection process was robust, potential alternatives discounted on reasonable grounds and the Council themselves recognise that there are no alternative appropriate sites. Accordingly, I conclude that the harm to the character and appearance of the area and to the living conditions of nearby

occupiers would be outweighed by the need for the installation to be sited as proposed given the lack of suitable alternatives."

Conclusion

The proposed standard street furniture solution, deployed for a limited period of 3years or until the permanent rooftop solution at Naylor Court is brought to fruition will provide nationally important replacement infrastructure at a local level, on a temporary basis, in the public interest and in line with National Government and regional aims to support the digital economy, global competitiveness, and the right infrastructure for underpinning world class connectivity.

All apparatus has been limited in amount and scale to a minimum operational requirement, and, unlike the current temporary solution, a grid connection will negate the need for any alternative power source, such as the current generator powered solution. A lesser mast height would simply not be operationally feasible, and we would contend that the design strikes an appropriate balance between operational and planning considerations. Once again, we would reiterate that any resulting impact will be temporary and well outweighed by operational need and the many social, economic and environmental sustainability benefits that modern communications networks bring.

Lastly, we contend that the criteria of both the NPPF and the LPA's planning policy has been adhered to for the many reasons outlined above.

We trust that the above and enclosed information is to your satisfaction and would be happy to expand upon any aspect of this proposal if required.

Confirmation that submitted drawings have been checked for accuracy

Contact Details

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Signed:	[redacted]	Date:	01 July 2026
Position:	Consultant Planner to Cluttons (on behalf of Cornerstone)		

Appendices

Appendix A: Design Options

Appendix B: Additional supporting information

- General Background Information for Telecommunications Development
- 5G Masts and Health
- Public Benefit of Mobile Connectivity
- Radio Planning and Propagation
- Community Information Sheets
  - 5G Services
  - Health Summary
  - Safety Guidelines on Electromagnetic Fields from Antennas
  - How it works
  - Coverage and Capacity

Appendix C: Coverage Plots

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Appendix A:
Design Options

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Appendix B:
Additional Supporting Information

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