SUPPLEMENTARY INFORMATION & HERITAGE STATEMENT

1. Site Details

Site Name:	Centurion House	Site Address:	Rooftop at Centurion House, 129 Deansgate, Manchester, M3 3WR
National Grid Reference:	383640, 398148		
Site Ref Number:	M163 326213	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. Existing telecommunications site identified.		
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:	See below
Name of contact:	See below
Summary of outcome/Main issues raised: A pre-application consultation has preceded this submission on 21st July 2026. The consultation included a written description of the proposal, draft plans, a consultation plan and discounted site information. No consultation response has been provided, and it has been considered appropriate to progress to application stage and discuss the merits of the proposal with the LPA upon validation.	

Annual area wide information to planning authority

[1] Macro or Micro

Has annual area wide information been provided?	No
Summary issues raised: N/A	

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline of consultation carried out: A pre-application consultation letter and copy of the proposal drawings were sent to the Deansgate Ward Councillors (Councillors Marcus Johns, Anthony McCaul and Sarah Wakefield) and Lucy Powell MP, by email, on 21st July 2026.			
Summary of outcome/main issues raised (include copies of relevant correspondence): No responses have been received to date.			

School/College

Location of site in relation to school/college (include name of school/college): No schools or colleges in proximity of the application site.
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

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:
This is an application for full planning permission; however, for completeness, a notice has been sent to the operator of Manchester Heliport on 21/07/2026 by email. Copy of the notice and proof of delivery enclosed.

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	Full Planning Application – relevant certificates and notices served 05/08/2026	

3. Proposed Development

The proposed site:
The application site is located on the rooftop of Centurion House, on Deansgate. Deansgate is a busy mixed use street comprising of predominantly retail, commercial and leisure uses, in the heart of Manchester City Centre. It is an 11 storey building. The rooftop currently hosts existing telecommunications equipment for a number of third-party operators. The building is not listed but sits in the Albert Square Conservation Area. There are also a number of listed buildings in the surrounds. The proposal is for the installation of 2 no. antennas, 1 no. GPS model and ancillary development thereto on the rooftop of Centurion House. A handrail will be installed on the unprotected edge of the building for health and safety reasons. Bracketed off the handrail there will be 1 no. antenna and a GPS model. These are extremely small pieces of equipment – the antenna measures approximately 30cm in height and the GPS model is approximately the size of a tennis ball. A support pole is also to be fitted to the handrail which will host a larger antenna measuring approximately 3 metres in height. An equipment cabinet will be located internally within the existing control room. The proposed site is required to support Smart Meters. Smart Meter is an electronic device that records consumption of electronic energy and communicates the information to the electricity supplier for monitoring and billing. Smart Meters typically record energy hourly or more frequently, and report at least daily. There is a legal obligation for all energy companies to complete their Smart Meter 'roll-out'. This means that energy suppliers need to take reasonable steps to offer Smart Meter

installations to their customers by the deadline. Customers are entitled to refuse going forward with the installation if they wish to.

Smart Meters contain a SIM card which connects to mobile networks to enable them to operate. Smart Meters cannot be rolled out without first installing the infrastructure necessary to connect the Smart Meters back into the network to relay their data. The proposed installation at Centurion House will provide coverage for Smart Metering in this busy central Manchester location.

Heritage

The site is located at Centurion House on Deansgate, which lies within the Albert Square Conservation Area.

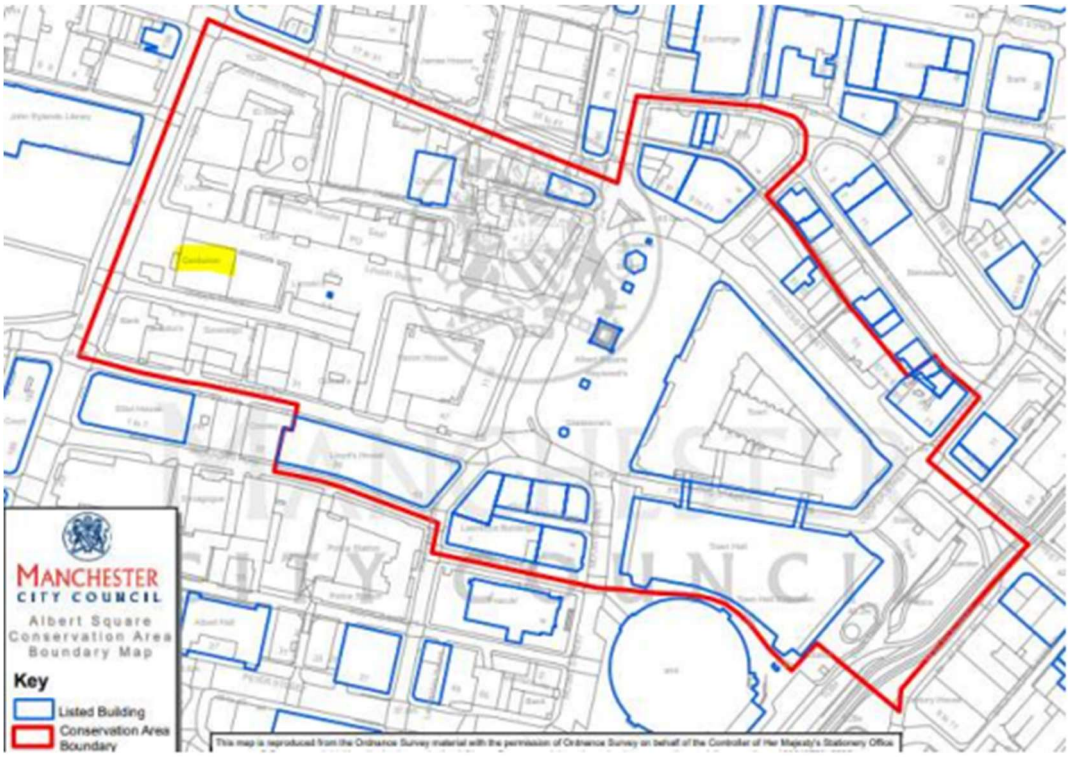


Fig. 1: Albert Square Conservation Area boundary map (Source: Manchester City Council). Conservation Area boundary outlined in red, listed buildings outlined in blue. Application site highlighted in yellow

The general character of the surrounding area in this location is one of a mixed-use, mixed architectural nature. Deansgate is a busy street in the city centre of Manchester, comprising of predominantly retail, commercial and leisure uses. Centurion House is a modern, 11 floor building, comprising of a glass façade with concrete features, located within a row of buildings (numbers 133-154) along the A56 Deansgate.

The Council do not have a formal adopted Conservation Area appraisal for Albert Square. However, the Council website contains information about the Conservation Area, its history, and guidance on control of development within it.

The application site is located on the western boundary of the Conservation Area, in an extension to the original Conservation Area. Manchester City Council's website provides the following information on the history of the area:

"*An extension to the conservation area includes the newly created Lincoln Square, where a water feature to commemorate the wedding of the Prince and Princess of Wales was inaugurated in 1981. The monumental statue of Abraham Lincoln, given to the city in 1919 in recognition of the support he received from the citizens of Manchester in his campaign against slavery, was moved into the city centre for the first time in 1986, from its original location in Platt Fields Park.*"

Given the historic and architectural interest of the Conservation Area, it is considered to be a heritage asset of moderate significance.

There are also a number of nearby heritage assets, including Deansgate/St Peter's Conservation Area to the west, the Grade II listed Abraham Lincoln Statue and Grade II Listed Electricity Junction Box to the east, and the Grade I Listed John Rylands Library and Attached Railings, Gates and Lamp Standards to the north west.

The proposal is for the installation of 2 no. antennas, 1 no. GPS model and ancillary development thereto on the rooftop of Centurion House. The building already hosts equipment for third-party operators, and as per NPPF and Code of Practice, utilising an existing telecommunications site/building is in accordance with the sequential approach to site selection. The proposed antennas are much thinner than traditional antennas such as those already present on the site for third party operators. Although the proposed equipment will sit higher on the rooftop and skyline than the existing equipment, the proposed antenna is so narrow that it is not considered that it will have an unacceptable visual impact on the host building, Conservation Area, or surrounding heritage assets.

Photomontages are enclosed as part of this application. These demonstrate that, from the rear elevation, within the Albert Square Conservation Area and from within the setting of the Grade II Listed Abraham Lincoln Statue and Grade II Listed Electricity Junction Box, the equipment is not visible due to its positioning on the rooftop and the height of the host building. The rooftop is naturally well outside of the eyeline of passersby in Lincoln Square and, even when the angle is craned upwards towards the rooftop, there is no visibility of the proposed equipment.



Fig. 2.1: Proposed photomontage from Lincoln Square/Brazennose Street

From the front elevation on Deansgate, the taller antenna will be visible in close range views. However, the proposed antenna is very narrow and although it will be visible, it is not considered that it will have an unacceptable visual impact on the surrounding area, the Deansgate/Peter Street Conservation Area or the setting of nearby listed buildings. In longer range views the antenna will blend into the skyline and will not be visible.

Viewpoint 2 in the enclosed photomontages is taken from the junction of Hardman Street and Deansgate. This was chosen as it represents close range views from within the Deansgate/Peter Street Conservation Area, and views into the Albert Square Conservation Area. Centurion House is set back on Deansgate and is an outlier for the otherwise linear buildings which line the eastern side of the street. Neighbouring buildings screen the rooftop of Centurion House from view from many public vantage points in the surrounding streetscene.



Fig. 2.2: Proposed photomontage from junction of Hardman Street and Deansgate. Proposed antenna circled in red

Viewpoint 3 in the enclosed photomontages was specifically chosen to represent views from within the setting of the Grade I Listed John Rylands Library and Attached Railings, Gates and Lamp Standards towards the Albert Square Conservation Area, and from the busy Spinningfields area. The rooftop is only visible in views fronting Deansgate; when moving further back alongside John Rylands Library on Brazennose Street the rooftop is obscured from view by 1 The Avenue.



Fig. 2.3: Proposed photomontage from Brazennose Street between John Rylands Library and 1 The Avenue

As demonstrated by the photomontages, the proposal will be visible from within the setting of nearby heritage assets. However, visibility is limited due to the height of the host building, the very thin design of the proposed taller antenna, the very small size of the second antenna and GPS model, the positioning on the rooftop outside of the natural eyeline of passersby, and neighbouring buildings which screen the rooftop from view from many public vantage points and street level. Where the proposed equipment is visible, it is considered that the impact on the heritage assets will be negligible.

Should the Local Planning Authority consider that harm is caused to the heritage assets as a result of the proposal, it is considered that this would be at the very lowest end of

less than substantial harm, due to the minimal nature of the proposed works and the limited visual impact.

Paragraph 215 of the National Planning Policy Framework states:

"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."

In this instance, the proposal is for the installation of telecommunications equipment which will allow local residents and businesses to benefit from Smart Metering. As such, there is significant public benefit as a result of the proposal.



Fig. 3.1: Site photo

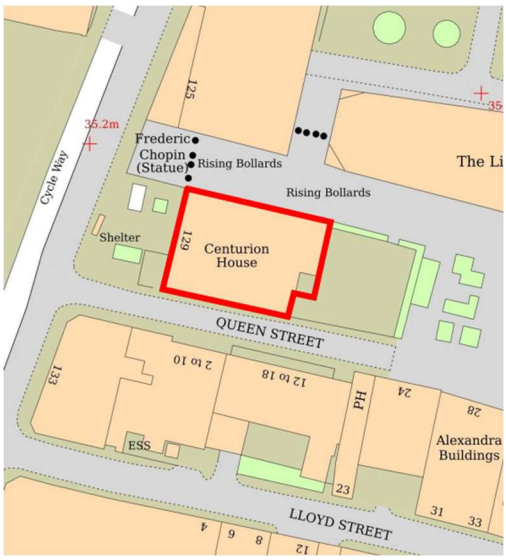


Fig. 3.2: Site Location

Enclose map showing the cell centre and adjoining cells if appropriate:

The proposed site is required for Smart Metering in the city centre of Manchester.

Type of Structure *(e.g. tower, mast, etc): Antennas and associated equipment on rooftop*

Description:

The proposal comprises the installation of 2 no. antennas and 1 no. GPS model located on the rooftop, and ancillary development thereto.

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

All steelwork will be galvanized grey steel. All apparatus will be coloured RAL7035 Grey.

Overall Height:	Approx. 51.5m
Height of existing building:	43.9m to main roof level
Equipment Housing:	
Length:	N/A
Width:	N/A
Height:	N/A
Materials:	
Tower/mast etc – type of material and external colour:	Steel, Galvanised Grey
Equipment housing – type of material and external colour:	N/A

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.

Following a sequential approach to site selection, further details of which are provided below, the subject site was deemed the best available site option.

Once nominated, the network planning team and design teams undertook a detailed site assessment to ascertain what equipment would be required to fulfil the operational brief from this location. This involved the use of network coverage prediction software tools and an onsite panoramic assessment to determine the necessary antenna and dish heights, orientations and numbers for optimum coverage and integration in the network to be achieved.

The assessments and software predictions concluded that 2No. antennas and 1No. GPS model would need to be deployed onsite. 1No. antenna measuring approximately 30cm in height and the GPS model, measuring approximately the size of a tennis ball, are required to be bracketed off the proposed handrailing. The larger 1No. antenna

measuring approximately 3 metres in height taken by itself is proposed to be fixed to a support pole which is bracketed off the handrail, sitting at a centre line height of 50m AGL.

The only part of the proposal which will be visible from surrounding public vantage points at ground level is the taller antenna. This antenna is very narrow and it is considered that it will assimilate into the skyline. The GPS model requires a clear line of sight to the sky and the antennas are sensitive to interruption, and therefore it is not possible to utilise a shrouded design solution in this instance. In any event, it is considered that a GRP (Glass Reinforced Plastic) shrouding over the top of the equipment would have a more apparent visual impact on the surrounding area and heritage assets than the current proposal.

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 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:

- Arqiva

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 proposed site is required to allow local residents and businesses to benefit from Smart Metering.

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)

Site Selection Considerations

When looking to address any new network service requirement, the operator will often define a search to ensure the new infrastructure can best fulfil the operational. 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 from 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?

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.

Siting and Design Considerations

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

  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.

  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.

  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 Arqiva. 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 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.

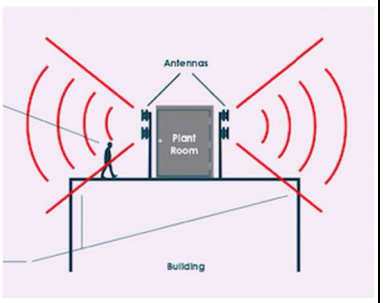
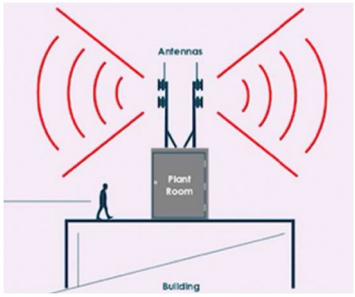
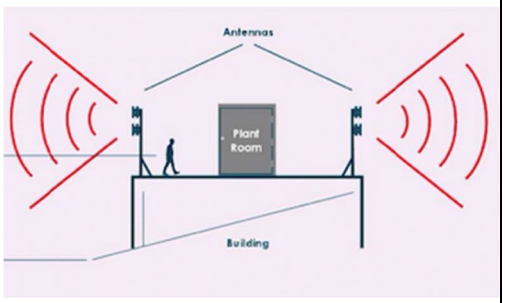
- ICNIRP

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

Fig. 4.1: 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.

Fig. 4.2: Discounted site map



Discounted Option and Site Type	Address and Site name	NGR	Reason for discounted Option
D1 RT	Sainsbury's Local, Quay Street, Spinningfields, City Centre, Manchester, Greater Manchester, England, M3 3HN, United Kingdom	E383510, N397970	This building is already host to a telecoms installation but is not optimal for radio performance for this network and has been discounted accordingly

D2 RT	Sunlight House, Quay Street, Spinningfields, City Centre, Manchester, Greater Manchester, England, M3 3LU, United Kingdom	E383492, N398025	This is a Listed Building therefore development on this heritage asset should be avoided and other locations are considered to be more appropriate. This site has therefore been discounted for this reason.
D3 RT	Spinningfields, City Centre, Manchester, Greater Manchester, England, M3 3HH, United Kingdom	E383395, N398060	This is a tall, dominant building but its is on the periphery of the search area and would not provide optimal coverage for the network
D4 RT	3, Hardman Street, Spinningfields, City Centre, Manchester, Greater Manchester, England, M3 3AT, United Kingdom	E383466, N398160	This is a tall, dominant building but its is on the periphery of the search area and would not provide optimal coverage for the network
D5 RT	3, Hardman Street, Spinningfields, City Centre, Manchester, Greater Manchester, England, M3 3AT, United Kingdom	E383500, N398149	This building would have part of its network capability blocked in part by D4 and has been discounted
D6 RT	John Dalton House, Mulberry Square, Civic Quarter, City Centre, Manchester, Greater Manchester, England, M2 6JP, United Kingdom	E383660, N398193	The Landlord at this site has advised that they are looking reconfigure the rooftop plant equipment and that a new radio installation would cause unnecessary disruption to that process. The site has been discounted accordingly.
D7 RT	182, Deansgate, Civic Quarter, City Centre, Manchester, Greater Manchester, England, M3 3LY, United Kingdom	E383578, N398130	In the context of the surrounding buildings, this location is too low to offer a satisfactory radio service.
D8 RT	Manchester Town Hall, Albert Square, Civic Quarter, City Centre, Manchester, Greater Manchester, England, M2 5DB, United Kingdom	E383857, N398088	This is a Listed Building therefore development on this heritage asset should be avoided and other locations are considered to be more appropriate. This site has therefore been discounted for this reason.
D9 RT	Dickinson Street, Civic Quarter, City Centre, Manchester, Greater Manchester, England, M2 3EY, United Kingdom	E383981, N397921	This is a tall, dominant building but its is on the periphery of the search area and would not provide optimal coverage for the network

D10 RT	One St Peter's Square, 1, St Peter's Square, Civic Quarter, City Centre, Manchester, Greater Manchester, England, M2 3AE, United Kingdom	E383939, N397893	This is a tall, dominant building but its is on the periphery of the search area and would not provide optimal coverage for the network
D11 RT	George Street, Petersfield, City Centre, Manchester, Greater Manchester, England, M1 4PB, United Kingdom	E383967, N397845	This is a tall, dominant building but its is on the periphery of the search area and would not provide optimal coverage for the network
D12 RT	Peter House, Oxford Street, Civic Quarter, City Centre, Manchester, Greater Manchester, England, M1 5AN, United Kingdom	E383893, N397838	This is a tall, dominant building but its is on the periphery of the search area and would not provide optimal coverage for the network
D13 RT	Midland Hotel, 16, Peter Street, Civic Quarter, City Centre, Manchester, Greater Manchester, England, M60 2DS, United Kingdom	E383796, N397860	This is a Listed Building therefore development on this heritage asset should be avoided and other locations are considered to be more appropriate. This site has therefore been discounted for this reason.
D14 RT	42, Peter Street, Civic Quarter, City Centre, Manchester, Greater Manchester, England, M2 5GP, United Kingdom	E383655, N397940	This is a Listed Building therefore development on this heritage asset should be avoided and other locations are considered to be more appropriate. This site has therefore been discounted for this reason.
D15 RT	Radisson, Peter Street, Civic Quarter, City Centre, Manchester, Greater Manchester, England, M2 5GP, United Kingdom	E383672, N397911	This is a tall, dominant building but it is on the periphery of the search area and would not provide optimal coverage for the network
D16 RT	Jackson's Row, Civic Quarter, City Centre, Manchester, Greater Manchester, England, M2 5WD, United Kingdom	E383719, N398015	At the time of the survey, this site was undergoing renovations and was discounted

Each of the above has been plotted on the following:

https://gridreferencefinder.com?gr=SJ8364098148|Application_s_Site|2,SJ8351097970|D1|1,SJ8349298025|D2|1,SJ8339598060|D3|1,SJ8346698160|D4|1,SJ8350098149|D5|1,SJ8366098193|D6|1,SJ8357898130|D7|1,SJ8385798088|D8|1,SJ8398197921|D9|1,SJ8393997893|D10|1,SJ83967978

45|D11|1,SJ8389397838|D12|1,SJ8379697860|D13|1,SJ8365597940|D14|1,SJ8367297911|D15|1,SJ8371998015|D16|1&v=r&labels=1

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[2]**

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[3]**

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*

[2] https://www.gov.uk/government/publications/uk-government-resilience-action-plan
[3] https://www.gov.uk/government/publications/uk-infrastructure-a-10-year-strategy

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."

- **UK Wireless Infrastructure Strategy[4]**

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. 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.

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."

- **UK Digital Strategy Policy Paper[5]**

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

[4] https://www.gov.uk/government/publications/uk-wireless-infrastructure-strategy/uk-wireless-infrastructure-strategy
[5] https://www.gov.uk/government/publications/uks-digital-strategy/uk-digital-strategy

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. The Strategy also highlights the fact that enhancing digital connectivity is 'Mission 4' of the Government's Levelling Up White Paper[6].

- **The Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2022[7]**

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

- **The Electronic Communications Code 2017[8]**

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.

[6] https://www.gov.uk/government/publications/levelling-up-the-united-kingdom
[7] https://www.legislation.gov.uk/uksi/2022/278/contents/made
[8] https://www.ofcom.org.uk/phones-telecoms-and-internet/information-for-industry/policy/electronic-comm-code

Other

- **Times Article, Prime Minister Comments**

On 05 December 2024, the former 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:

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

National Planning Policy Framework (NPPF) February 2025[9]

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

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

[9] https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf

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 with specific reference to digital infrastructure, 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.

- Section 16 'Conserving and enhancing the historic environment' confirms the need to consider the potential impact of development upon historic assets, advocating that any proposal that results in harm to a designated heritage asset must have clear and convincing justification. Most importantly, Paragraph 215 of the NPPF confirms that where a development proposal leads to less than substantial harm, then this harm must be weighed up against the public benefits of the development proposal, including its optimum viable use.

Code of Practice for Wireless Network Development in England[10]

This document 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.

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

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

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.*
- *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.*

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

On the matter of heritage, the Code states:

"The siting and location of any wireless infrastructure can be critical to visual impact. Operators should therefore consider how harm to heritage assets from both the process of installation of equipment, and subsequent visual impacts, can be avoided or minimised."

Paragraph 59

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

Local Planning Policy and Guidance[11]

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that "If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise".

[11] https://www.stalbans.gov.uk/current-local-plan

The statutory development plan as defined by the Planning and Compulsory Purchase Act 2004 comprises:

- **Places for Everyone Joint Development Plan**
- **Manchester Core Strategy 2012 - 2027**

Places for Everyone Joint Development Plan

The Places for Everyone Plan is a joint development plan document for nine Greater Manchester districts – Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan. It took effect and became part of the statutory development plan for each of the nine districts on 21st March 2024.

The vision for Greater Manchester is:

"Our vision is to make Greater Manchester one of the best places in the world to grow up, get on and grow old:

- *A place where all children are given the best start in life and young people grow up inspired to exceed expectations.*
- *A place where people are proud to live, with a decent home, a fulfilling job, and stress-free journeys the norm. But if you need a helping hand, you'll get it.*
- *A place of ideas and invention, with a modern and productive economy that draws investment, visitors and talent.*
- *A place where people live healthy lives and older people are valued.*
- *A place at the forefront of action on climate change with clear air and a flourishing natural environment.*
- *A place were all voices are heard and where, working together, we can shape our future."*

The Plan sets out a number of Strategic Objectives to help achieve its vision. Those relevant to the proposal include:

"Objective 3: Playing our part in ensuring a thriving and productive economy in all parts of Greater Manchester.

Objective 4: Maximise the potential arising from our national and international assets. We will:

- Enhance our cultural, heritage and educational assets.
- Ensure infrastructure provision supports growth in these locations.

Objective 6: Promote the sustainable movement of people, goods and information. We will:

- Ensure new development provides opportunities for affordable, high quality digital infrastructure.

Objective 7: Playing our part in ensuring that Greater Manchester is a more resilient and carbon neutral city-region.
We will:
- Promote sustainable patterns of development that minimise the need to travel and contribute to cleaner air.

Objective 9: Ensure access to physical and social infrastructure.
We will:
- Ensure that our communities and businesses are supported by infrastructure;
- Improve the capacity and network coverage of digital, energy, telecoms, transport and water in key growth locations."

Policy JP-S1 relates to Sustainable Development. It states that to help tackle climate change, development should aim to maximise its economic, social and environmental benefits simultaneously, minimise its adverse impacts, utilise sustainable construction techniques and actively seek opportunities to secure net gains across each of the different objectives.

Policy JP-P1 relates to Sustainable Places. Although this is a general design policy which was not written with telecommunications development specifically in mind, a number of its aims are relevant to all development including the application proposal. It states that development should conserve and enhance the natural environment, landscape features, historic environment, and local history and culture, and respect and acknowledge the character and identity of the locality in terms of design, siting, size, scale and materials used. Development should respond to the needs of all parts of society, enable everyone to participate equally and independently, provide opportunities for social contact and support, and promote a sense of community. Of particular relevance, point 14. states that development should be well-connected, particularly by digital infrastructure. It acknowledges that this will enable everyone to take advantage of the employment, cultural and leisure opportunities across Greater Manchester and beyond.

Policy JP-P2 relates to Heritage. It states that development proposals affecting designated and non-designated heritage assets and/or their settings will be considered having regard to national policy.

Section 10 of the Plan relates to Connected Places. It acknowledges that one of the Greater Manchester Strategy's ten priorities is to deliver an integrated network with world-class connectivity that keeps Greater Manchester moving and that drives prosperity, whilst protecting the environment, improving air quality and transitioning to a zero carbon future.

Para. 10.3 states:

"*10.3 – 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."

Para. 10.21 states:

"10.21 - … 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… 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."

Policy JP-C1 relates to an Integrated Network and states that, in order to help deliver an accessible, low carbon Greater Manchester with world-class connectivity, the Plan supports a range of measures, including enabling the provision of high quality digital infrastructure.

Policy JP-C2 relates directly to Digital Connectivity. It states:

"We support the provision of affordable, high quality, digital infrastructure. In making decisions we will support a range of measures, including:

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

In the supporting text of the policy, para. 10.29 acknowledges that digital connections are increasingly important to every aspect of our lives, and states that it is important that everyone can access them so that they can fully participate in society and the economy.

Para. 10.30 states:

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

Para. 10.31 acknowledges that digital connections will be imperative to the design, development and delivery of future services in the context of an expanding global city.

Para. 10.32 states that it is fundamental that all parts of the city-region have access to world-class digital connections. It recognises that the area suffers from limited access to mobile networks, especially in rural areas.

Para. 10.33 is clear that improving digital infrastructure and ensuring that new development is connected to it is a high priority for the city-region. It states that it will be important that the area is at the forefront of the roll-out of next generation mobile technology, and acknowledges that digital infrastructure will need to adapt and evolve throughout the Plan period to keep up with new digital technologies.

Manchester Core Strategy DPD July 2012

The Manchester Core Strategy was adopted in July 2012 and sets out the long term strategic policies for Manchester's future development and will form the framework that planning applications will be assessed against.

The Core Strategy Vision states that: 'By 2027 Manchester will be:

- *A successful and accessible city in the front rank of cities in Europe and the world.*
- *A city with a growing economy driven by the strength of the Regional Centre and Manchester Airport which supports a successful City Region. The knowledge based economy flourishes with an entrepreneurial community, characterised by a fully skilled, inclusive working population.*
- *Meeting the challenge of climate change at the forefront of environmental initiatives and improvement and continuing to deliver sustainable development and a more effective green infrastructure.*
- *A city with an increased and sustainable healthy population and a community which both benefits from and drives the City's productivity upwards.*
- *A city with neighbourhoods where people choose to live all their lives.*

In order to help meet this vision the Core Strategy sets out a number of spatial objectives.

Spatial Objective SO1 relates to spatial principles and aims to provide a framework within which sustainable development of the city can contribute to halting climate change.

Spatial Objective SO2 relates to the economy and supports a significant further improvement of the City's economic performance and spread the benefits of this growth across the City to reduce economic, environmental and social disparities, and to help create inclusive communities.

SO4 relates to Centres and aims to provide a network of distinctive, attractive and high quality centres, strengthening local identity, providing essential services close to homes and local access to healthy foods.

Policy SO1 relates to spatial principles and states inter alia that development in all parts of the City should:

- *Make a positive contribution to neighbourhoods of choice including making a positive contribution to the health, safety and well-being of residents.*
- *Considering the needs of all members of the community regardless of age, gender, disability, sexuality, religion, culture, ethnicity or income.*
- *Minimise emissions.*
- *Improve access to jobs, services, education and open space by being located to reduce the need to travel.*

Policy EC1 relates to employment and economic growth in Manchester. The policy states that the priorities for economic growth include:

- *Ensuring the continued social, economic and environmental regeneration of the city.*
- *Ensuring the connectivity to international markets for the import and export of goods to ensure competitiveness in international markets.*

Policy DM1 relates to development management. It is a general design policy which is not specifically related to telecommunications but contains some relevance for such applications. The policy states that all development should have regard to the following inter alia:

- *Appropriate siting, layout, scale, form, massing, materials and detail.*
- *Impact on the surrounding areas in terms of 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, odours, litter, vermin, road safety and traffic generation.*

Policy CC9 relates to Design and Heritage. It states that development in the city centre should preserve or enhance the heritage assets that have been identified, including conservation areas.

Policy EN3 relates to Heritage. It states that new developments must be designed to support the Council in preserving or, where possible, enhancing the historic environment, including the character, setting and accessibility of conservation areas.

Greater Manchester Digital Blueprint

The Greater Manchester Digital Blueprint sets out the ambitions and approach to meeting them for the period 2023-2026, with regards to digital connectivity and growth. It identifies five digital priorities and four key strategic enablers, developed in

collaboration with stakeholders from across Greater Manchester's digital sector, sharing strategic commitments. It states *"we remain committed to being a digital city-region with a difference. By putting people, the environment and place at the heart of our plans, we aim for a more inclusive and sustainable approach that builds on our greatest assets."*

The main aims of the Blueprint are to better the lives of people living and working in the Greater Manchester region, making them empowered by the opportunities a *"digitally fuelled city-region brings"*, and to use technology and data better to make the city region a greener, fairer and more prosperous place.

The foreword, by Councillor Eamonn O'Brien, states:

"Our 2023-26 Digital Blueprint sets out our priorities for a more digitally resilient and rapidly growing Greater Manchester, so that everyone regardless of age, location or situation can benefit from the opportunities that digital can bring."

The Blueprint targets include having 200,000 people engaged, helping them benefit from the digital world in 2023-24, and achieving a minimum 90% gigabit coverage across Greater Manchester by 2024. In areas where fibre connectivity is difficult, existing mobile networks can be utilised to ensure gigabit connectivity is provided.

One of the priorities identified is *"Creating connected, inclusive, sustainable places", and a strategic enabler for this to be met is to extend digital infrastructure. The Blueprint states that the city-region will "ensure we have world class digital infrastructure that stimulates economic growth and enables the development of our growth zones, across sectors and localities".*

Greater Manchester Strategy 2021 – 2031

The Greater Manchester Strategy 2021 – 2031 sets out a plan to ensure *"Good Lives for All" within Greater Manchester, making it "a great place to grow up, get on and grow old; a great place to invest, do business, visit and study"*. It is accompanied by a three-year delivery plan which will be monitored, revised and reviewed on a regular basis.

The Strategy states:

"We were already on a digital journey, which has been accelerated by the pandemic. As part of our recovery and the progression of Greater Manchester, we will continue to embrace digital technologies and deliver ambitious digital infrastructure plans for our city-region, ensuring our people and places can make the digital shifts required to enable the attainment of our collective ambitions."

The Strategy acknowledges that at the moment, it is not a level playing field for many in the city-region, and it seeks to redress that imbalance head on. One of the main aims of

the strategy is to drive out digital exclusion, ensuring all sectors of society have digital access and can benefit from the realisation of opportunities. Part of this involves:

"…it will be important to build on the rapid acceleration in digital communication and access to services which has enabled more people to work from home and access a wide range of opportunities without the need to travel."

It is also stated:

"The development of all our places will be underpinned by the extension of our world class digital infrastructure, ensuring businesses and homes are digitally enabled and equipped. We will… strive to address digital exclusion and accessibility in an increasingly digitised society."

Greater Manchester Local Industrial Strategy (June 2019)

The Local Industrial Strategy sets out how Greater Manchester (GM) will forge its future. It states that it will build on GM's position as a *"leading European digital city-region; enable the digitalisation of all sectors; and capitalise on the links between digital and creative industries that feed internationally significant clusters in broadcasting, content creation and media, and maximise growing assets in cyber security"*.

It aims to put in place the integrated 21st century infrastructure needed for digital driven, clean and inclusive growth, retaining its place as a top 5 city-region for the digital economy in Europe, with full fibre broadband and 5G coverage.

The Strategy states that GM will take a 'Made Smarter' approach to all industries, supporting forms to adopt new digital and creative techniques and enabling the digitisation of all sectors.

The strategy has a specific section relating to infrastructure and acknowledges its importance:

"…the city-region now aims to upgrade, integrate and future-proof its infrastructure, to create a 21st century city-region with extreme digital connectivity, clean and inclusive growth and – through work with others – improved access to national and global markets… Existing partnerships are working to improve digital infrastructure in the city-region to meet national targets of roll of 5G technologies for most people by 2027".

The Local Industrial Strategy sets out an objective to ensure the vision for infrastructure is met:

"World-class connectivity – digitally and through an integrated transport network within all parts of GM."

To achieve the ambitions of the GM Local Industrial Strategy it identifies actions around 5 foundations of productivity: Infrastructure, Ideas, People, Business Environment and Places. These are noted as being essential attributes of every successful economy. It also identifies opportunities grouped under 4 Grand Challenges – Artificial Intelligence and Data, the Ageing Society, Future Mobility and Clean Growth.

The Vision for the Digital, Creative and Media is set out in the Local Industrial Strategy and reproduced below:

"GM will be a leading European digital City-Region, with the infrastructure, skills and networks needed to digitise all sectors, and internationally significant clusters in broadcasting, content creation and media and cyber security."

To help meet the vision, the strategy states that GM will continue to transform the digital connectivity of the city-region to drive economic growth and innovation, working with Government to meet national targets of full roll-out of 5G technologies for most people by 2027.

The Local Industrial Strategy acknowledges that GM will aim to become one of the best digitally connected city-regions in the UK. It fully supports the maintenance and development of networks, including 4G and 5G.

Greater Manchester Infrastructure Framework 2040

This is a pre-cursor to the GM Infrastructure Strategy. The aim is to focus on developing infrastructure which ultimately improves the lives of all those living and working within Greater Manchester.

The Infrastructure Framework acknowledges a number of key challenges, one of which is digital and the need to provide pervasive, affordable, resilient digital connectivity. The Framework notes that "Digital technology is increasingly the backbone of the major industries and our daily lives".

The Framework goes on to state that 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 fixed fibre) supported by 5G (and subsequent technologies). It will also need to streamline the process for installation of new infrastructure within the street space.

The Framework notes the vision for the GM Infrastructure Strategy:

"Develop and maintain a holistic infrastructure system that is robust, accommodates sustainable growth and supports the ambitions of the Greater Manchester Strategy to make "Greater Manchester one of the best places in the world to grow up, get on and grow old."

" The Greater Manchester Infrastructure Strategy should seek to:
o Support the lives and well-being of people, communities and the environment within Greater Manchester.
o Be age-friendly and support the economic and social participation of both young and old.
o Support strategically identified growth for parts and communities within Greater Manchester.
o Be flexible, robust and met the existing and future needs of the communities and technological change.
o Provide world-class connections and access to opportunity for all.
o Provide world-class digital infrastructure which provides a platform for GM to embrace emerging technological and societal changes.
o Support a carbon-neutral GM and be economically, environmentally and socially sustainable."

The Framework identifies a key infrastructure trend to 2040 as Digital (Telecommunications Operators) including mobile infrastructure:

"As the population and employment is due to rise:
o more people will mean more homes and businesses, and more consumers of digital services.
o There will be a growing demand for high-speed, resilient data connectivity to facilitate changing patterns such as shopping patterns moving online, whilst flexible working becomes more prevalent.
Changing workforce:
o More productive, higher skilled, higher paid jobs more specialised and skill activities needs digital infrastructure to support higher skilled industries – which may require increased digital infrastructure.
Environmental Change:
o Improving efficiencies of buildings and appliances. The use of smarter technologies within each infrastructure sector will look to improve efficiencies further."

The Framework comments on digitalisation noting the importance of it and how it has transformed the way in which we go about our everyday lives:

"We live in an increasingly digital world. Technologies that are visionary today rapidly become part of everyday life tomorrow. In turn, people's expectations are rising constantly. "Digital" now encompasses an increasing array of technologies, from sensors, smartphones and robots, to augmented reality, cloud computing and data analytics. These technologies are changing the way in which we live and places we live in. Digital technologies are being used to make cities more smooth running, more productive, and more democratic. The pervasiveness of digital technology in our lives represents a major change. For these technologies to function effectively, it is fundamental that a robust and diverse underpinning infrastructure is installed that ensures a future-proofed platform for the development of these and many new technologies for years to come.

As our homes, businesses and cities become more reliant on digital technology to function the robustness of these systems becomes even more critical".

The Framework states that" anyone in GM should be able to access resilient, seamless connectivity at a speed they need anywhere and anytime":

"New technologies, artificial intelligence and atomisation:
o Improvements in artificial intelligence and atomisation technologies will transform infrastructure sectors and business markets.
o Digital infrastructure will be crucial to supporting future technology and a Smart City Region.
o Embracing digital technology throughout all sectors, geographies and occupations is fundamental to GM's current and future international competitiveness."

The Framework acknowledges that the vision of moving to a smart and digitally-ready city region requires future digital infrastructure to be strong fixed resilient connectivity, supported by 5G (and beyond), big data systems and other nascent technologies such as Artificial Intelligence and machine learning. Without connectivity it is acknowledged that processing the sheer volumes of data necessary to create a network of communicating devices will be impossible. As such, the Framework states that big improvements are required to increase the provision of wired and wireless (through 5G or subsequent technologies and Wi-Fi provision) across GM. Without the more basic technology solutions (such as passive fibre connectivity and 5G) the smart-region solutions and value-added outcomes will struggle to be brought to fruition.

The Framework notes that 5G roll out is expected from 2020. However, the timing and costs of roll out is uncertain and international standards have yet to be agreed. It is possible that there will only be one network upon which providers deliver their services or that each provider might need to invest.

With regards to the Regional Centre if Challenge 8 is to be met to provide pervasive, affordable, resilient digital connectivity the challenge is early roll out of 5G especially in areas where mobile data use is congested such as the Regional Centre.

The Framework also states that GMCA and the Districts together with digital and telecommunication providers need to drive forward opportunities to promote connectivity and uptake in the Regional Centre.

Planning Summary

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

- Operational Requirement

There is a clear operational need for the development which has been devised by Arqiva to provide Smart Metering in an area that is not currently not able to benefit from efficient Smart Metering services. The intent is that the proposed infrastructure will allow local residents and businesses to benefit from Smart Meter installations. Without this infrastructure, network users in the area will continue to experience

- Siting

  The siting of any new base station development is directly linked to operational need and development in the target area is critical to fulfilling the operational brief. Furthermore, with regards to the siting of replacement infrastructure, as is the case here, development within the Conservation Area and close to listed buildings simply cannot be avoided due to the extensive nature of the designations within the historic core of Manchester City Centre.

  A sequential approach to site selection has preceded the nomination of this site and further details have been supplied above. One will note that the proposal utilises an existing building which already hosts third party telecommunications equipment, in full accordance with the preferential sequential approach as set out in NPPF and Code of Practice.

  The subject site makes use of a rooftop location on an unlisted building set within a context of similar buildings. It is not prominent in the locale and although visible from the adjacent road network such views will be temporary and everchanging as one travels through the area. The minimal nature of the proposed equipment also ensures visual impact is minimised so far as practicable.

  The Applicant contends that a balance between planning and operational considerations has been struck, with the list of alternative sites provided confirming that no less harmful, operationally viable or more appropriate site is available. That 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.

- 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. The proposed development will improve coverage for Smart Metering services. The amount and size of apparatus has been limited as far as is operationally possible and the equipment has been clustered together as best as possible to prevent any random jumble of infrastructure. One will, however, appreciate that the expanse of the rooftop and clipping issues directly impacts the location and height of the proposed antennas.

  Furthermore, as indicated earlier in this statement, the use of GRP shrouding is not viable, hence the bare antennas being proposed. Whilst not technically viable it was also considered that GRP shrouding would have a larger visual impact than the proposed exposed antennas.

  With regards to the colour scheme, grey has been considered best for assimilating within the host property and any views that may be afforded against the wider roofscape and skyline. However, the applicant would be happy to consider any alternative colour scheme that the LPA may wish to suggest.

  One will note that the general appearance is reflective of that of the other licenced operators' developments on the building.

- Impact upon amenity
  Whilst some impact upon general amenity will occur as a result of deploying new infrastructure, the utmost of efforts must be made to limit harm through sensitive siting and design procedures. Any harm that may occur must also be weighed up against public benefit and operational justification.

  It must be recognised 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. Indeed, telecommunications development is an accepted infrastructural element in our modern landscapes, regardless of planning sensitivities and it would, therefore, be wholly wrong to suggest that a base station development is an 'alien' feature in any modern environment.

With regards to the public domain, the development will be visible from public vantage points at ground level on Deansgate and Brazennose Street, next to the John Rylands Library. However, the size of the host building and the position/narrow nature of the antennas helps to mitigate impact, with passersby perspectives on the development constantly changing as they travel through the area. The rooftop is out of the natural eyeline for people passing the site at ground level and thus the impact upon general amenity is considered to be acceptable.

A well-balanced assessment of this development proposal must also consider the economic, social and sustainability implications of local residents/community/businesses not having access to Smart Metering via this essential infrastructural development along with an appreciation of the many benefits that the development will bring. 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, as is the case here.

- Flooding
  A flood risk assessment is not considered necessary in this instance.

- Health
  An ICNIRP Certificate has been supplied. As such, the issue of health is not a material planning consideration. However, for the benefit of further information on this matter, we would refer the reader to the additional supporting information that has been submitted with this application.

Conclusion

The proposed base station development is nationally important Up-to-Date infrastructure being deployed at a local level, 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.

One must appreciate that the technical requirement simply cannot be addressed from outside the target area and the criteria of both the NPPF and the LPA's planning policy has been adhered to for the many reasons outlined above.

It is our contention that in devising the proposed base station, Arqiva has afforded full respect to the amenity of the surrounding area and heritage assets. It is imperative to acknowledge that it is almost impossible for telecommunications development to enhance the character or setting of the area in which it is required to be deployed and more often than not all that can be done is to seek to minimise impact to an acceptable level through sensitive siting and design practices, as has been the case.

The proposed base station has specific functional and operational criteria that cannot be expected to adhere strictly to more general policy criteria. Therefore, when considering the merits of the proposed development against more generalised policy criteria, it must be done in an appropriately weighted manner.

With regards to site selection, we would again reiterate that the NPPF does not oblige a telecommunications operator to identify the 'ideal' site but rather to apply a reasonable and sequential approach to site selection. The nominated site for the proposed development has been identified for use as it is tall enough to meet the technical requirements of the operator and also hosts a number of third-party operator installations. The chosen site maximises the use of existing buildings and features for context and backdrop purposes, and strikes an appropriate balance between operational and planning considerations.

In terms of design, all apparatus has been limited in amount and scale to a minimum operational requirement. A lesser amount of apparatus or antenna height would simply not be operationally feasible, and we would contend that the design strikes an appropriate balance between operational and planning considerations. An appropriate colour scheme has also been included but the colour of the proposed equipment can be changed if the Local Planning Authority consider an alternative colour would be more appropriate.

There should also be no doubts that any other available and operationally viable site or design options would have a greater degree of impact on general amenity or built heritage and the proposal before you therefore represents the least harmful solution for fulfilling the operational brief.

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

Name: (Agent)	Vicky Weston	Telephone:	07591 646221
Company:	Perry Williams Ltd for Arqiva		

