SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Water Street SW	Site Address:	WATER STREET, MANCHESTER, GREATER MANCHESTER, M3 4JW
National Grid Reference:	E 382780 N 397748		
Site Ref Number:	CS 20768822	Site Type:[1]	SW - 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: N/A		
Were industry site databases checked for suitable sites by the operator:	**Yes**	No
If no explain why: N/A		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	**Yes**
Date of pre-application contact:	01/06/2026
Name of contact:	N/A

[1] Macro or Micro

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Summary of outcome/Main issues raised:

Consultation letters and information were sent to the Planning Authority on 1st June 2026

They responded with the following:

"Further to your consultation letter in respect of the above. The proposed location is problematic in terms of this being something that we can support the principle of for the reasons set out below.

There are ongoing and emerging regeneration plans within the Water Street area, including a planned programme of large high-quality green space that would overlap with the proposed site for the installation, this is detailed in the emerging 2026 Water Street Strategic Regeneration Framework with its focus on a landscape-led strategy, centred around a major new public park along the River Medlock.

Given the above context it is considered that the proposed installation's scale and siting would not be consistent with the objectives of the SRF and would adversely impact on the design quality aspirations for the area.

In addition the site is located within Castlefield Conservation Area and it is considered that it would adversely impact on the conservation areas character.

For these reasons, we would not support this proposal as presented but we are happy to discuss alternative sites and continue to provide pre-application advice.

I look forward to discussing this further with you."

The comments raised by the Planning Officer have been carefully considered in the preparation of this application.

Water Street Strategic Regeneration Framework

The application site falls within the boundary of the emerging Water Street Strategic Regeneration Framework (SRF). The SRF establishes a long-term spatial vision for the regeneration of the area centred on the delivery of a residential-led mixed-use neighbourhood, a significant new public park associated with the River Medlock, enhanced pedestrian and cycle connectivity, improved public realm and coordinated infrastructure delivery. Chapter 6.0 of the document makes clear that it provides **high-level guidance** to inform future planning applications and does not prescribe fixed development parameters or introduce new planning policy.

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*"The Development Aspirations set out below provide **high -level guidance to shape the form, character and structure of development within the Water Street SRF** area. These aspirations establish the overall approach to built form, public realm, connections and landscape **without prescribing fixed parameters or introducing planning policy**"*

During pre-application discussions, Manchester City Council expressed concern that the proposed telecommunications installation could adversely affect the design aspirations of the SRF. These comments have been carefully considered in developing the proposal.

The proposed installation would not prejudice the delivery of the Water Street SRF. Whilst located within the SRF boundary, the monopole would be positioned to the rear (north-west) of the illustrative Block C building, adjacent to an existing utility building and within an area already characterised by highway infrastructure and utility equipment. The proposal is therefore located away from the principal public park, riverside promenade and primary public realm, which the SRF identifies as the defining feature of the regeneration proposals extending east and southwards towards the River Medlock.



Figure 1: *Water Street Strategic Regeneration Framework*

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The proposed telecommunications installation occupies a modest footprint within the adopted highway and would not sterilise land identified for redevelopment or prevent the future delivery of the proposed public park, enhanced pedestrian and cycle routes, or the wider regeneration aspirations identified within the SRF. Furthermore, the SRF recognises that regeneration will be supported through the coordinated delivery of infrastructure alongside development and public realm improvements**. The provision of modern digital infrastructure is an essential component of creating sustainable, well-connected neighbourhoods and supports both existing users of the area and future redevelopment.**

Whilst the proposal will inevitably introduce a new item of telecommunications infrastructure into the streetscape, this does not amount to a conflict with the SRF's objectives or aspirations. The Framework does not seek to preclude the provision of essential infrastructure, but instead establishes a flexible spatial framework within which future development proposals will be assessed. Given the limited footprint of the proposal, its location adjacent to existing utility infrastructure, and the fact that it would not compromise the delivery of the principal public open space or wider regeneration proposals, it is considered that the development is compatible with the overarching vision and objectives of the Water Street Strategic Regeneration Framework.

The conclusions reached above are reinforced by a recent Planning Inspectorate appeal decision relating to a proposed 20m telecommunications installation at Topps Tiles Car Park, Cheetham Hill Road, Manchester (APP/B4215/W/24/3356856). The appeal considered a proposal of a similar scale within an area identified for comprehensive regeneration where Manchester City Council considered that the development would prejudice its future regeneration aspirations and conflict with the area's design vision.

In allowing the appeal, the Inspector concluded that the telecommunications installation would not undermine the regeneration aspirations for the area and found that there was **"little reason why it would conflict with the aspirations of those plans or prejudice that future development."** The Inspector further noted that the scale of future redevelopment would reduce the long-term visual prominence of the telecommunications equipment and recognised that regeneration strategies require modern utility infrastructure, including enhanced digital connectivity.

These findings are directly relevant to the current proposal. As in the appeal case, the proposed monopole occupies a modest footprint, would not sterilise land required for redevelopment, and would not prevent the delivery of the strategic objectives identified within the Water Street Strategic Regeneration Framework. The

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proposal would instead provide essential digital infrastructure capable of supporting both existing users and the future mixed-use neighbourhood envisaged by the SRF.

Castlefield Conservation Area

With regard to heritage, the site lies within the Castlefield Conservation Area, one of the largest and most significant conservation areas in Manchester. The significance of the conservation area is derived principally from its industrial heritage, characterised by substantial brick warehouses, canal infrastructure, railway viaducts and associated engineering works. While these historic assets remain an important component of the conservation area's significance, the immediate surroundings of the application site are predominantly characterised by modern development, including contemporary high-rise buildings and associated infrastructure. Consequently, there is limited appreciation of the historic industrial character within the immediate townscape.

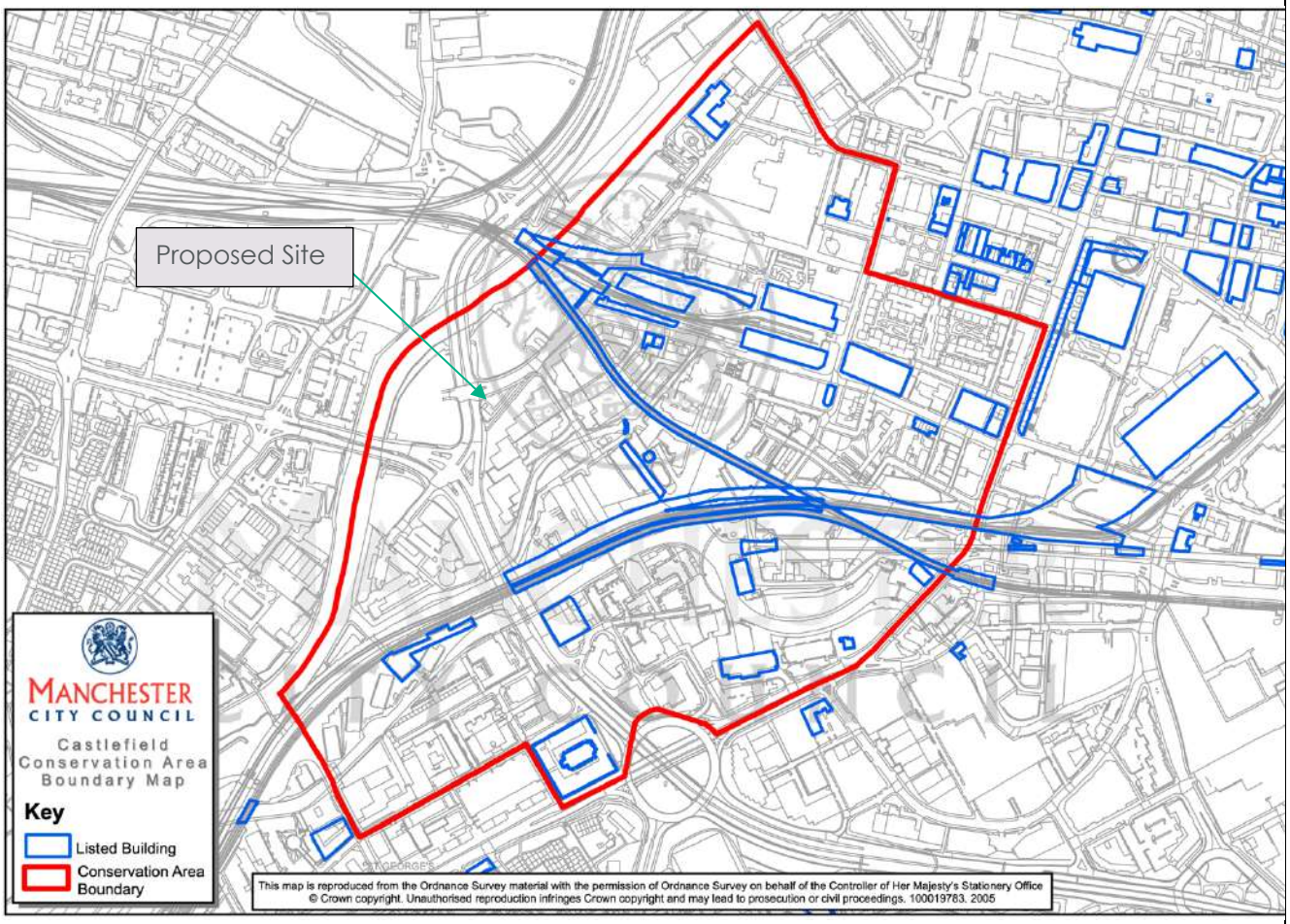


Figure 2: *Castlefield Conservation Area*

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Notwithstanding this context, the proposal has been designed to respond appropriately to its surroundings. Modern utility and communications infrastructure are now considered as important elements within an evolving streetscape, that provide vital connectivity to under-connected areas. The proposed telecommunications equipment would be read as a functional element within this established and evolving urban environment. Due to its modest footprint, relationship with existing street furniture and utility infrastructure, and the contemporary character of the immediate area, the proposal would not detract from the significance of the Castlefield Conservation Area, interrupt important views, or harm the appreciation of nearby heritage assets. It is therefore concluded that the proposal would preserve the character and appearance of the Castlefield Conservation Area, in accordance with Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, Section 16 of the National Planning Policy Framework, and relevant local heritage policies.

Annual area wide information to planning authority

Has annual area wide information been provided?	No
If no explain why:	
Summary issues raised: Cornerstones commercial relationship with VMO2 has changed, effectively increasing our independence to work with other companies in the deployment of mobile infrastructure. It means we no longer have visibility of VMO2s full update plan. However, Cornerstone is fully committed to working closely with Local Planning Authorities and following best practice guidance. We aim to engage and work with the planning department at the earliest opportunity from when we are instructed to deliver new infrastructure within your Local Authority area and often conduct strategic pre-rollout engagement meetings to discuss our wider rollout. If your Local Authority would like a meeting to discuss wider Cornerstone rollout plans then please advise. We recognise the importance of developing long term partnerships and will always work with you to deliver improved mobile connectivity.	

Community Consultation

Rating of Site under Traffic Light Model:			Red

Outline of consultation carried out: On 1s June 2026 consultation letters with drawings and other supplementary information was sent to:- Deansgate ward councillors: • Cllr Joan Davies cllr.joan.davies@manchester.gov.uk • Cllr Anthony McCaul cllr.anthony.mccaul@manchester.gov.uk • Cllr Marcus Johns cllr.marcus.johns@manchester.gov.uk Local MP: • Lucy Powell MP House of Commons London SW1A 0AA lucy.powell.mp@parliament.uk
Summary of outcome/main issues raised (include copies of relevant correspondence): No response was received.

School/College

Location of site in relation to school/college: No schools were located within close proximity to the site.
Outline of consultation carried out with school/college: N/A
Summary of outcome/main issues raised: N/A

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Civil Aviation Authority/Secretary of State for Defence or the operator of the civil safeguarding area or defence safeguarding area notification

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

Developer's Notice

Copy of Developer's Notice enclosed?	**Yes**	No
Date served:	30/07/2026	

3. Proposed Development

The proposed site:
This Planning Statement has been prepared on behalf of Cornerstone in support of a proposed telecommunications installation required to address a critical gap in network coverage and capacity within Castlefield area. The proposal will deliver new and improved service for VMO2 customers and forms part of a targeted network improvement programme aimed at enhancing existing 4G service and introducing 5GSA capability to meet rising consumer demand, improve coverage and deliver increased network capacity, required to resolve a significant local service deficiency. Capacity is an ever increasing issue where the network cannot handle the additional traffic created by data hungry applications and given the volume of people and devices accessing the network. This leads to dropped calls and constant buffering of data services. This capacity issue is often more of an issue than coverage in urban and suburban areas where there is a density of people and devices trying to access data services on the network, however in addition to the capacity issues here,

coverage is also poor given the area simply does not have any site for the necessary infrastructure to provide the required service.

Demand in the area will only continue to grow, with the redevelopment proposals in the immediate area set to attract a significant number of people to the area. Not only will those new residents, visitors and businesses have no connectivity but that level of population influx will have an impact on the capacity of the surrounding network - existing infrastructure around the edges of the wider area will try to pick up the slack and they will all fail meaning that without new telecommunications infrastructure, it would not only mean the new development goes without service it needs but it will have further reaching impacts on the wider area and existing service from existing infrastructure to existing residents and businesses - so the implications and potential negative socio-economic impacts are further reaching beyond just servicing the new developments within the immediate vicinity of the site.

The great effort has gone into finding a location that minimises impact while delivering that improved service.

Site Location

As previously noted, 5G radio technologies operate within higher radio frequency bands than previous mobile technologies. Whilst this enables significantly increased capacity and faster data speeds, these higher frequencies do not propagate as far as lower frequency bands and are more readily affected by buildings, vegetation and other physical obstructions. As a result, modern telecommunications infrastructure must be positioned much closer to the areas where demand exists in order to deliver reliable service.

The target coverage area in this instance comprises the busy Regent Street, Trinity Way and Egerton Street junction and surrounding areas such as residential neighbourhoods, together with the commercial, employment and transport corridors that generate significant levels of daily mobile data demand.

Delivering modern 4G and 5G services creates a challenging technical requirement given the dense urban environment, extensive highway infrastructure and numerous physical constraints present throughout the search area.

The application site is located on a parcel of highway verge immediately south of the Water Street and Trinity Way road junction. The site comprises an area of hard standing surrounding a utility building. The site is bounded by mature trees to the north, and benefits from a band of mature trees of the south, screening it from

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nearby buildings. The site is seen in the context of the busy transport corridor, which provide a main route on the western approach to Manchester City Centre.

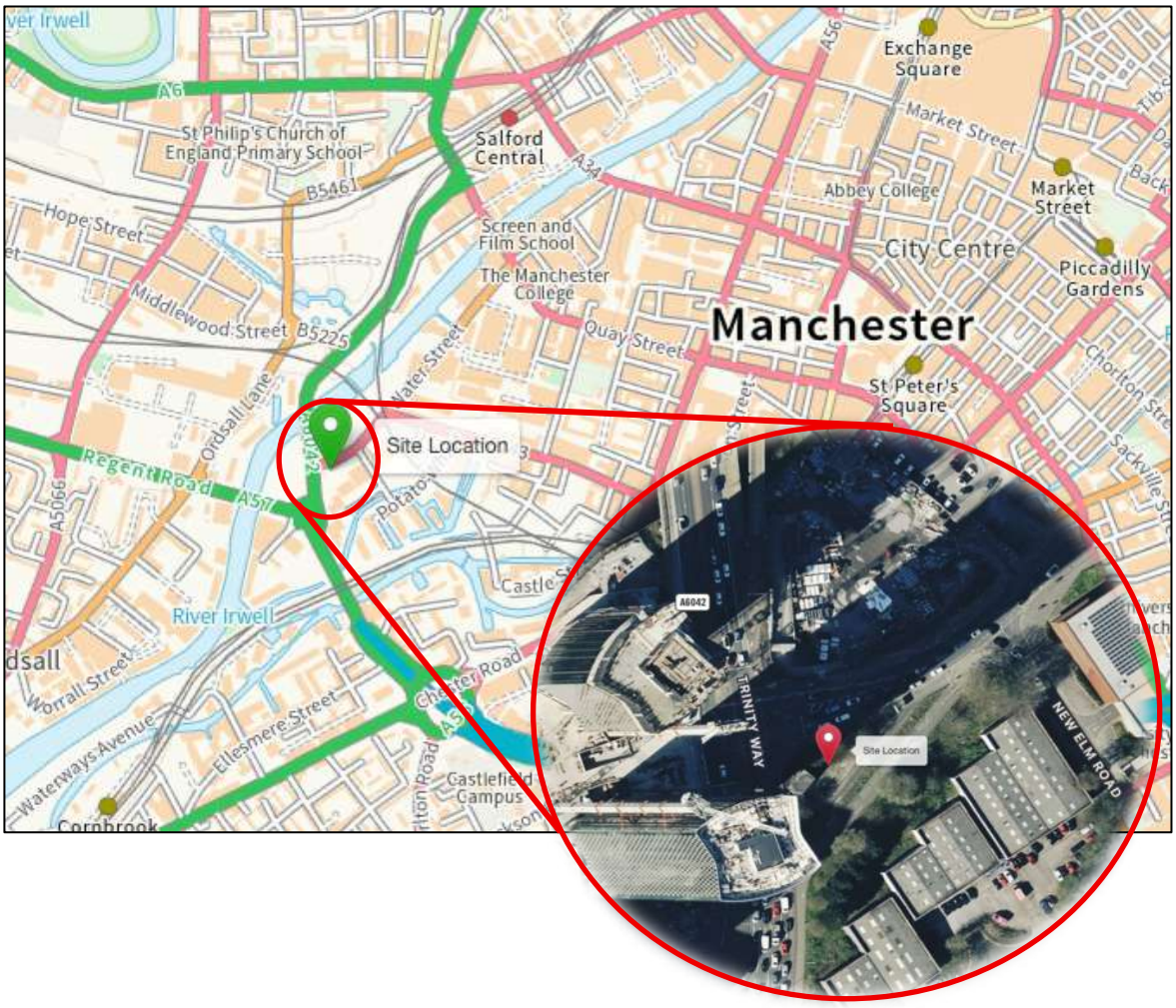


Figure 3: *Site Location*

The surrounding townscape is characterised by substantial highway infrastructure, including the Trinity Way dual carriageway, signalised junctions, lighting columns and associated street furniture. The immediate area also accommodates a range of modern utility infrastructure and is influenced by significant ongoing regeneration activity.

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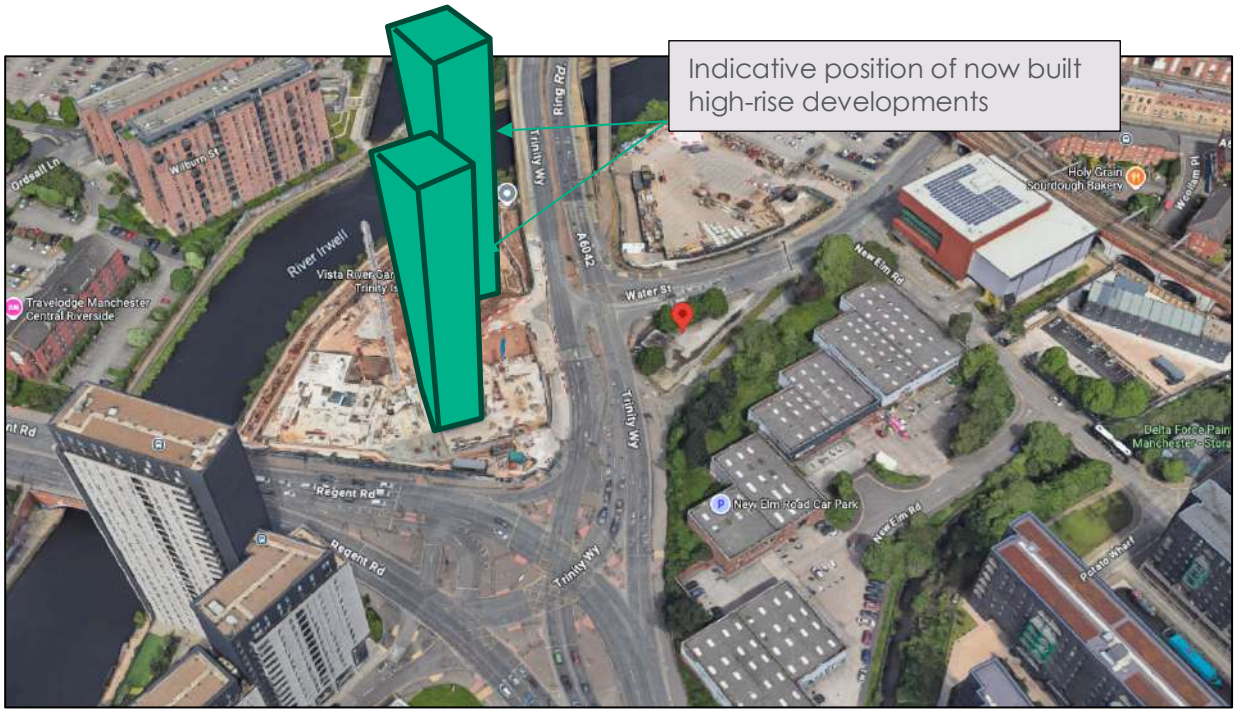


***Figure 4**: Birds-eye view of site*



***Figure 5:** CGI of proposed Trinity Islands Development*

To the west, the site overlooks the Trinity Islands development, comprising a number of very tall residential towers, including buildings in excess of 60 storeys that now form a dominant feature of the local skyline. Additional high-rise residential development is present throughout the surrounding area, with further large-scale redevelopment sites currently under construction.



***Figure 6**: View Towards Trinity Islands Developments*

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Immediately east of the site are modern commercial and industrial buildings fronting New Elm Road, including The Big Yello Self Storage, whilst to the south the provides a vegetated edge between the highway and employment uses. Although the site falls within the Castlefield Conservation Area, the immediate surroundings are predominantly modern in character, with the historic industrial significance of the wider conservation area largely experienced through its broader townscape rather than the immediate street scene.

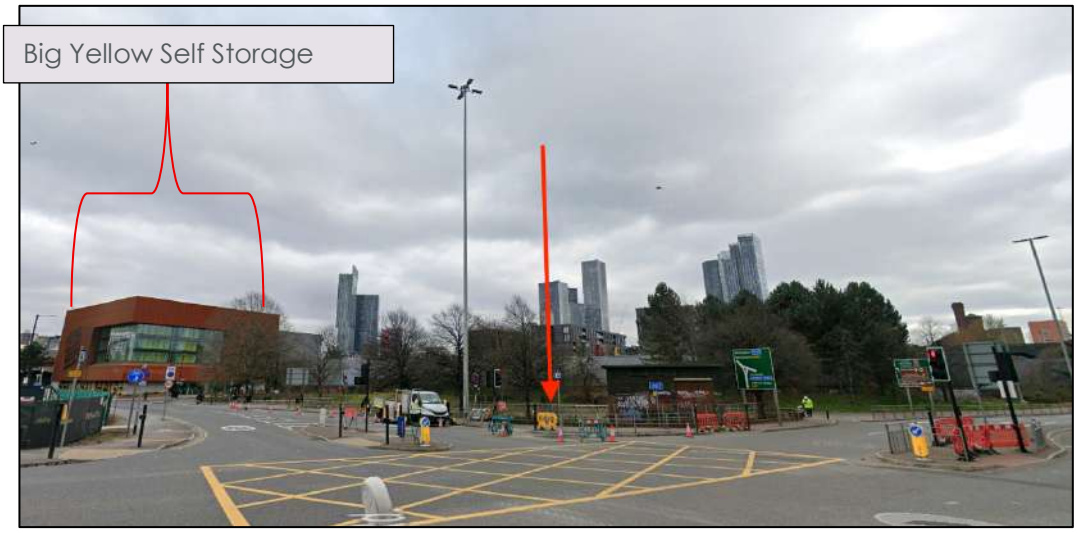


Figure 7: *View Facing East*

The proposed installation would be located adjacent to an existing utility cabinet, allowing telecommunications infrastructure to be grouped alongside existing service equipment and reducing visual clutter elsewhere within the streetscape.

The proposal comprises a 20-metre-high slimline monopole, which would be notably lower than the existing approximately 30-metre-high highway lighting column located immediately to the north-west of the site. Furthermore, when viewed in the context of the surrounding built environment, including the recently constructed and emerging high-rise buildings, the proposed mast would appear modest in scale and would not compete with or dominate the skyline. Existing mature trees would also provide partial screening from several viewpoints, further reducing its visual prominence.



Figure 8: *Immediate context of the site*

Overall, the application site is located within an evolving urban environment where modern infrastructure, large-scale development and significant transport engineering are the defining characteristics. The proposed telecommunications

installation would therefore integrate comfortably within its surroundings and would not appear incongruous within the existing townscape.

The proposal also follows established Government best practice guidance which advocates the siting of telecommunications equipment adjacent to existing vertical structures and within areas where surrounding development and vegetation assist in reducing visual impact. In this regard, the proposed street pole is positioned alongside existing highway infrastructure and mature roadside trees, ensuring that it sits comfortably within its urban context.

Paragraph 39 of the Government's Code of Practice on Mobile Network Development states:

"Mast positioning: all new masts should be sited, so far as is practicable, so as to **minimise** their impact on their setting, including the landscape and any buildings. This includes siting next to similar structures - streetworks masts, for example, should ideally be sited in line, and in harmony, with existing vertical infrastructure, such as street lighting columns, to minimise their visual impact. Placing a mast within or adjacent to an existing group of trees, vegetation and other natural features can reduce visual impact."

The proposal accords with these principles through its location within an established highway corridor, adjacent to existing street furniture and mature vegetation.

Visibility of telecommunications infrastructure does not automatically equate to harm. Whilst the upper sections of the proposed installation would inevitably be visible from junctions around Water Street and surrounding streets, those views would occur within a heavily urbanised environment already characterised by numerous vertical structures, high-rise developments, commercial development and highway features. The proposal would therefore appear as a logical and proportionate addition to the existing streetscene rather than an incongruous feature.

Given the technical constraints associated with modern 5G deployment, together with the current lack of coverage in the wider area, it is considered that the proposed location represents the optimum balance between operational requirements and environmental considerations. The proposal achieves the necessary network objectives whilst avoiding more sensitive residential locations and minimising impacts upon visual amenity.

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Design

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

Modern 5GSA service is provided via higher frequency radio spectrum. This is helpful in that it can deliver low latency, high speed and high capacity data transfer required to service modern applications, sensors and devices, however, this spectrum does not propagate as far nor propagate through materials (like trees or buildings) as well as lower frequency spectrum utilised by previous generations. This directly impacts and advises the necessary height, design and siting to overcome that constraint.

As a result, 5G requires taller structures to achieve the same level of coverage footprint.

The antennas are placed in stacked apertures – 5G antennas at the top, above the 4G antennas. This top-height at 20m is the minimum height required to provide high-quality 4G and 5G coverage to the intended target area. If the mast height were any lower, it would not be able to provide sufficient coverage to the target coverage area due to radio propagation constraints and signals being blocked by surrounding 'clutter' in the form of trees and buildings.

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

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

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The mast is proposed light grey colour – this was intentional to minimise contrast against the overlooking and concealing trees belt backdrop it will be viewed against and will assimilate with the existing immediate surroundings.

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

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

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

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

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

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

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

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

Type of Structure:	
Description: The proposed development comprises the installation of a 20m high slimline Orion streetworks monopole supporting 6 no. antennas and 3 no. ERS radio units, and 2 no. 300mm Dishes together with equipment housing and associated ancillary development. The installation has been designed to support both 4G and 5G technologies. For full technical specifications and layout, please refer to the enclosed drawing package.	
Overall Height:	20m
Height of existing building:	N/A
Equipment Housing:	
Length:	See drawings
Width:	See drawings
Height:	See drawings
Materials:	
Tower/mast etc – type of material and external colour:	Pole painted 'Light Grey' (RAL 7035) with grey antennas (as noted, happy to amend colour depending upon LPA preference).
Equipment housing – type of material and external colour:	Steel equipment cabinets coloured Fir Green.

Reasons for choice of design, making reference to pre-application responses:
This is discussed at length in the previous section of this document – to negate unnecessary duplication this will not be repeated but please reference the detail discussed previously. The NPPF and Code of Practice encourages site sharing and the efficient use of existing telecommunications infrastructure. However, within the defined search area,

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there are no existing base stations that are capable of being shared to provide this new service.

Policy also advocates the use of buildings where possible and, as discussed at length previously, the buildings in the search area do not provide sufficient height. In any case, their nature as dwellings mean that the rooftops would not be suitable structurally or aesthetically.

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

All in all it is felt that that this proposed design strikes the best balance in terms of technical necessity to overcome technical constraints and minimising visual impact by keeping the height to an operational minimum, clearing the trees to assist radio propagation to minimise the need for additional sites in the area and by utilising a colour finish that will minimise contrast when viewed adjacent the mature tree belt.

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

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

Health and Safety - including ICNIRP compliance

The proposal is designed to be fully ICNIRP compliant and is submitted with an ICNIRP compliance certificate.

ICNIRP public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines. When determining compliance the emissions from all mobile phone network operators on the site are taken into account.

4. Technical Justification

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

In the UK, mobile network operators (MNOs) such as EE, VodafoneThree and VMO2 operate under a regulatory framework primarily controlled by Ofcom on behalf of UK Government. Their obligations arise from two main legal mechanisms:

- Wireless Telegraphy Act spectrum licences (for use of radio frequencies).
- General Conditions of Entitlement under the Communications Act 2003 (for provision of electronic communications networks/services).

Through the Spectrum Licence Obligations (Wireless Telegraphy Act 2006) mobile operators require licences from Ofcom to use radio spectrum, which is essential for operating mobile networks.

Key obligations typically include the use of allocated spectrum that must be used within specific frequency bands, power limits, emission standards and interference controls.

These conditions ensure efficient spectrum use and prevent interference. These radio spectrums are governed by the laws of physics but one spectrum/frequency will have different principles to another. Each Network Operator is licenced to use different spectrum and this is why what may be suitable siting for one operator may not be suitable for another. This directly influences potential siting opportunities for masts.

Perhaps most significantly, these licences are issued with coverage and network performance obligations. This will include things like roll-out or coverage requirements, minimum population coverage or geographic coverage requirements for rural areas. Obligations linked to specific technologies or generations like 5G.

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Operators must be provide data to Ofcom on network performance and demonstrate compliance with coverage and network performance milestones to demonstrate they have met their licence obligations.

Additionally, under the General Conditions of Entitlement (Communications Regulation) any operator providing public electronic communications networks or services must comply with Ofcom's General Conditions.

This means that, amongst other things, an Operator must Operators must enable and maintain network integrity and resilience, and ensure access to emergency services.

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

This is relevant to the proposal because…

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

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

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

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

Under the terms of its licence with UK Government (controlled via Ofcom on Governments behalf), Virgin Media O2 Limited (VMO2) are required to meet strict

service obligations, ensuring that the benefits of mobile connectivity are extended to all communities, including those currently underserved.

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

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

As low-powered radio transmitters, base stations have a limited effective range and must be located within or close to the areas they are designed to serve. Proposing this installation too far from the intended coverage area will leave parts of the target service area without essential mobile services. For this reason, the proposed location has been carefully selected to ensure the required coverage objectives can be achieved efficiently and effectively.

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

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

There is a specific requirement for a new base station installation (the proposal). This additional site will allow upgraded service to be delivered with improved coverage and capacity across the surrounding area required to handle the volume of data traffic accessing the network via devices and phones.

5. Site Selection Process

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

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

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

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

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

The **local urban environment** presented further constraints. The wider search area is subject to a number of re-development proposals, including the Water Street SRF to the south and the Trinity Islands Developments to the north. As such, these locations are considered unsuitable for telecommunications infrastructure.

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

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

Alternative sites considered and not chosen:-



Figure 9: *Search area and discounted options*

Option	Site Name and Address	National Grid Reference	Reason for not choosing
D1 – Rooftop	Goodwin Building, Potato Wharf	E: 382898 N: 397604	An installation at this location would be within the Conservation Area. Development within this sensitive area should be avoided, and other locations are considered to be more appropriate to deliver the required level of coverage to the target area.
D2 – Rooftop	Kelso Place	E: 382707 N: 397422	Due to the physical lack of space and restricted access at ground level, this site would have major build implications.
D3 – Rooftop	Wilburn Basin, M5 4XP	E: 382719 N: 397911	Due to the construction of the building, there is no suitable design available to support the operator's apparatus and provide the necessary coverage to the target area.
D4 – Rooftop	Wilburn Basin, M5 4XP	E: 382635 N: 397824	Due to the construction of the building, there is no suitable design available to support the operator's apparatus and provide the necessary coverage to the target area.

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D5 – Greenfield	New Elm Road, M3 4JW	E: 382781 N: 397660	A mast at this location is not viable due to the physical lack of space required to accommodate the installation and deliver the necessary coverage to the target area. The site has therefore been discounted.
D6 – Rooftop	Castlefield Hotel (Y Club), M3 4NB	E: 383040 N: 397775	Due to the construction of the building, there is no suitable design available to support the operator's apparatus and provide the necessary coverage to the target area.
D7 – Rooftop	Wilson Building, M3 4NX	E: 382858 N: 397593	An installation at this location would be within the Conservation Area. Development within this sensitive area should be avoided, and other locations are considered to be more appropriate to deliver the required level of coverage to the target area.
D8 – Rooftop	Whitworth Building, M3 4AR	E: 382931 N: 397640	An installation at this location would be within the Conservation Area. Development within this sensitive area should be avoided, and other locations are considered to be more appropriate to deliver the required level of coverage to the target area.
D9 – Rooftop	Saville Building, M3 4AR	E: 382972 N: 397648	An installation at this location would be within the Conservation Area. Development within this sensitive area should be avoided, and other locations are considered to be more appropriate to deliver the required level of coverage to the target area.
D10 – Rooftop	Trinity Building, M3 4AU	E: 382717 N: 397723	Due to the construction of the building, there is no suitable design available to support the operator's apparatus and provide the necessary coverage to the target area.
D11 – Rooftop	Trinity Building, M3 4AU	E: 382705 N: 397781	Due to the construction of the building, there is no suitable design available to support the operator's apparatus and provide the necessary coverage to the target area.
D12 – Rooftop	Wilburn Basin, M5 4XP	E: 382660 N: 397927	Due to the construction of the building, there is no suitable design available to support the operator's apparatus and provide the necessary coverage to the target area.
D13 – Greenfield	The Air Group, New Elm Road, M3 4NT	E: 382839 N: 397716	A mast at this location is not viable due to the physical lack of space required to accommodate the installation and deliver the necessary coverage to the target area. The site has therefore been discounted.
D14 – Rooftop	One Regent, Regent Road, M3 4AY	E: 382668 N: 397652	Due to the construction of the building, there is no suitable design available to support the operator's apparatus and provide the necessary coverage to the target area.
D15 – Rooftop	Worsley Mill, M15 4LG	E: 382874 N: 397466	The building is a designated listed building. Development affecting this heritage asset should be avoided where more appropriate alternatives are available. The site has therefore been discounted.

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D16 – Greenfield	Car Park off New Elm Road, M3 4JH	E: 382902 N: 397752	A mast at this location is not viable due to the physical lack of space required to accommodate the installation and deliver the necessary coverage to the target area. The site has therefore been discounted.

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

N/A

Land use planning designations:

The site is located within Castlefield Conservation Area, however as explained above within this report, the proposal is not considered to have an adverse impact upon this CA.

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

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

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

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

Legislation
The proposal constitutes permitted development with prior approval.

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

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

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

Local Policy

The adopted Manchester Local Development Plan Framework 2012, including the 2024 adopted Places for Everyone and supporting local planning policies, promote the delivery of modern digital and telecommunications infrastructure as an important component of sustainable economic growth, connectivity and urban regeneration. The planning framework recognises that high-quality digital infrastructure is essential to support businesses, residents, educational institutions and emerging employment sectors, particularly within key growth corridors and areas of regeneration.

Planning policy generally supports telecommunications development where it:

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

Saved UDP Policy DC17 – Telecommunications

Policy DC17 requires telecommunications development to be sited and designed so as to **minimise** *[my emphasis]* its impact on residential amenity and environmentally sensitive areas. The policy does not seek to prevent any visual change nor does it

require telecommunications infrastructure to be invisible; rather, it recognises that such development is necessary and starts from a presumption in favour of new telecommunications infrastructure, provided its effects have been appropriately mitigated through careful siting and design.

In this instance, the proposed installation has been positioned adjacent to existing utility infrastructure within a highway verge that is already characterised by substantial transport infrastructure, including a 30m highway lighting column, traffic signals, highway signage, mature street trees and associated street furniture. The proposed 20m slimline monopole has been designed to minimise its visual presence and would remain lower than the adjacent lighting column. Furthermore, it would be viewed against the backdrop of the emerging Trinity Islands development and other modern high-rise buildings, where it would appear as a functional component of the existing streetscape rather than an incongruous feature.

Whilst the proposal will inevitably introduce a new vertical element into the street scene, this represents the unavoidable consequence of delivering modern telecommunications infrastructure. The proposal has nevertheless been carefully sited and designed to minimise its visual impact, consistent with the requirements of Policy DC17.

A comprehensive sequential assessment has demonstrated that alternative locations would result in greater impacts upon residential amenity, visual amenity, pedestrian movement, operational requirements or streetscape character. The proposal therefore represents the least intrusive viable solution capable of delivering the required network improvements.

Whilst the site is located within a sensitive area by virtue of its position within the Castlefield Conservation Area, the proposal has been designed to **minimise** visual impact and would preserve the character and appearance of the Conservation Area. The development would therefore accord with the objectives of UDP Policy DC17.

Manchester Core Strategy

The proposal also aligns with the wider objectives of the Manchester Core Strategy. Policy SP1 (Spatial Principles) seeks to promote sustainable development and investment in infrastructure necessary to support economic growth and communities. Policy EN1 (Design Principles and Strategic Character Areas) requires development to respond positively to local character and townscape, whilst ensuring that proposals are appropriately integrated into their surroundings. The proposed installation has been carefully sited within an established urban environment adjacent to commercial development and existing infrastructure.

Through its positioning, scale and relationship with surrounding built form and mature vegetation, the proposal responds appropriately to its context whilst delivering infrastructure necessary to support modern digital connectivity.

Places for Everyone

Policy JP-C1 – An Integrated Network of the Joint Development Plan supports the provision of strategic infrastructure across Greater Manchester and specifically identifies the importance of digital connectivity. The policy states that Greater Manchester will support measures including:

"Enabling the provision of high quality digital infrastructure."

The supporting text recognises the increasingly important role digital infrastructure plays in modern society, stating:

"Digital connections are increasingly important to every aspect of our lives, from socialising and shopping to learning, business and accessing essential services."

It further recognises that:

"Any truly global city will need to have widespread, affordable, reliable, secure and future-proofed digital infrastructure that provides a competitive edge for businesses and supports high-levels of social inclusion."

The supporting text concludes that:

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

Policy JP-C2 – Digital Connectivity develops this objective further and states:

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

The policy specifically supports:

"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."

The proposal directly supports the objectives of Policies JP-C1 and JP-C2 through the provision of enhanced telecommunications infrastructure that will improve network

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coverage and capacity within the Castlefield area. The proposal will facilitate the continued evolution of digital communications technology and contribute towards the provision of modern, resilient and future-proofed digital infrastructure.

Importantly, the proposal has been directed towards one of the few locations within the search area where it can be associated with existing high-rise developments, commercial/light industrial development, highway infrastructure and established urban features rather than residential frontages. The site benefits from an existing commercial backdrop, mature tree cover and surrounding street furniture which assist in integrating the proposal into the wider townscape and reducing visual prominence.

The submitted sequential assessment demonstrates that alternative locations would result in greater impacts upon residential amenity, visual amenity, pedestrian movement, operational requirements or streetscape character. Accordingly, the proposal accords with the objectives of Policies JP-C1 and JP-C2 by maximising digital connectivity whilst protecting townscape quality and minimising planning impacts to the greatest extent practicable.

The proposed streetworks pole on Water Street accords with the objectives of the adopted planning framework due to its location within a well-established mixed-use area characterised by significant existing infrastructure, transport activity and urban development within a well screened locale, both adjacent to and against the backdrop of commercial development. Water Street forms part of a carriageway leading to commercial premises on the side which offers a backdrop to the proposal, and contains a variety of trees and street furniture, lighting columns, signage, commercial premises and modern development, creating a visually active streetscape capable of accommodating telecommunications infrastructure without appearing incongruous.

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

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

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considered to align with the aims of the adopted planning policy framework relating to telecommunications and digital infrastructure. With all this considered the proposal supports the relevant local planning policy.

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

Regional Policy and Strategy – Greater Manchester Combined Authority

World class Digital connectivity is a major strategic aim the Greater Manchester Combined Authority and the GMCA have numerous strategic documents that add significant evidential weight to the material socio-economic benefits of mobile connectivity and the necessary infrastructure to provide it.

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

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

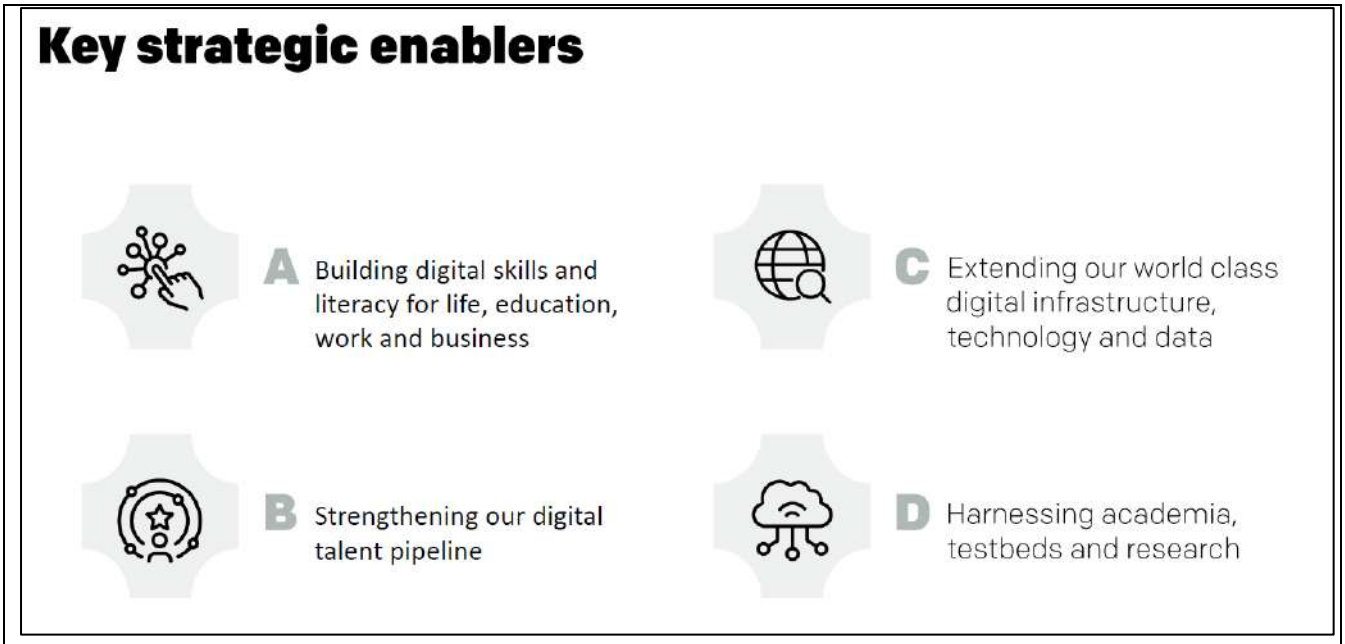
The need for digital connectivity, provided by infrastructure like the proposal, is discussed consistently throughout this document as something that underpins all strategic aspirations of the city region.
Additionally, the **'Greater Manchester Digital Blueprint 2023-26'** adds further weight and context….

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

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

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

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

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

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

There is clearly extensive weight of support for infrastruture like the proposal. This proposal is part of a network that wholly underpins these wider strategic and economic aspirations of both Manchester City Council and Greater Manchester. Without infrastructure like the proposal those aspirations cannot be met and it is significant that no specific area is depreived of this while the rest of the city region benefits, creating a digital divide that will impact the locality.

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

National Digital Strategy, Planning Policy and Guidance:-

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

The document notes that…

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

This guidance document is clear that…

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

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

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

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

Paras 28 and 40 discuss how proposals should minimise impact through good design and utilise colours that minimise and reduce contrast – this is wholly the case here with the colouring of the mast – grey pole as it will be viewed against a streetscape

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and mostly grey skies and grey antennas as they must clear buildings for radio propagation and will be seen against a typically grey sky.

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

NPPF

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

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

Chapter 10 'Supporting High Quality Communications' sets out the main policy tests for telecoms proposals. It states…

"*Advanced, high quality and reliable communications infrastructure is* ***essential for economic growth and social well-being****. Planning policies and* ***decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G)*** *and full fibre broadband connections. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).*"

"*The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum* ***consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion****. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be* ***sympathetically designed*** *and camouflaged where appropriate.*"

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

Again, the proposal wholly aligns with the policy tests required in the NPPF. It is significant to note the policy test specifically and purposefully notes 'consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion' – this is an acknowledgement of the

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technical constraints associated that directly influence siting and design (also noted in the Code of Practice Guidance) and gives clear indication and direction that weight must be applied to those operational matters.

The policy concluded that sites should be designed sympathetically – it is been demonstrated throughout the document that through considered siting and design impact has been minimised – siting away from residential property, siting adjacent to vegetation for screening/backdrop, colouring to assimilate with other adjacent structures, the lowest height that will keep the site viable operationally/technically and the most slimline a pole design possible as it is the most sympathetic to the locality even when a more robust pole or lattice would be better operationally.

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

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

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

"Planning policies should…

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

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

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

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

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

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

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

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

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

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

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

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

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

to support the sector in delivering greater connectivity for local communities and businesses.

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

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

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

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

Other Material Considerations – Appeals

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

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

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

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

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

APP/P4605/W/25/3359736

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

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

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

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

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

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

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APP/P4605/W/24/3349032

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

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

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

The appellant has supplied a number of reasons as to why these sites should be discounted from the search *including: concerns with upgrading the existing mast nearby, interference between masts, issues with the structural suitability and wind loading requirements of buildings in the search area and the impact the surrounding buildings and topography of the area would have upon signal transmissions. Certain sites were also discounted due to concerns with highway safety and the nearby railway line and underground services. Some sites were situated within residential areas or within parks close to trees that were covered by a Tree Preservation Order as well as concerns over the effect of the mast upon the character and appearance of the area which provided reasons to discount them.*

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

comprehensive, and reliable evidence has been given for discounting other possible ground-based mast sites.

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

APP/P4605/W/24/3357531

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

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

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

The ***proposal would support high-quality infrastructure, an approach which is supported by Chapter 10 of the Framework****. When* ***balancing this benefit against the harm identified in relation to the first main issue, I consider that the benefits of the proposal would outweigh the identified harm*** *to the character and appearance of the area."*

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It is clear that this proposal complies with…

- Manchester Local Development Plan and Saved UDP Policies
- Places for Everyone
- National Planning Policy (NPPF)
- National Planning Guidance (Code of Practice for Wireless Network Development)
- Wider national economic and digital aspirations and strategies
- Meets appropriate procedural and balance tests applied in appeal decisions

Planning Assessment

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

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

Siting

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

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

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The proposed location, a road lined with trees and existing vertical infrastructure in the form 30m high lighting columns, lighting poles, highway infrastructure and combined with the backdrop of high rise buildings dominating the character of the area, the proposal will comfortably accommodate the proposal within this context would not create any unacceptable additional harm beyond what is there already. In fact, siting adjacent trees and similar structures to provide screening and backdrop is directly advocated in local and national Planning Policy and Guidance.

Crucially however, the proposed development lies **outside the direct line of sight of the nearest residential properties and utilising natural vegetation screening/backdrop to** preserve residential amenity.

Due to the careful siting, surrounding landuse, presence of mature trees adjacent to which the proposal is sited, the proposal does not result in any unacceptable visual dominance or overlooking of sensitive receptors. Where visible it will create minimal material harm.

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

Visual Appearance and Design

The proposed 20m street pole has been designed as the minimum height necessary to provide the required level of 4G and 5G coverage to the target service area. The height reflects the operational requirements of modern telecommunications equipment, including the need to provide reliable signal propagation across the surrounding urban environment, maintain appropriate clearance above surrounding buildings and vegetation, and achieve compliance with the relevant ICNIRP public safety standards.

The proposal has been designed in accordance with established telecommunications best practice with visual impact minimised wherever possible. The use of a slimline street pole represents the least visually intrusive form of telecommunications infrastructure available for a development of this nature. Alternative designs such as lattice towers or open headframe structures would introduce significantly greater visual bulk and would appear substantially more prominent within the streetscene.

The proposed installation is located within an established commercial and highway corridor on Water Street, characterised by a range of existing vertical features

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including street lighting columns, traffic signage, mature roadside trees, utility infrastructure, commercial development and with onward views of 60-storey high rise developments. Consequently, the proposed street pole would be viewed within the context of an already developed and visually active environment rather than as an isolated feature within an open landscape.

The light grey finish proposed for the pole and antennas has been selected to minimise visual contrast against the backdrop of the often grey sky and wider urban environment. The associated equipment cabinets will be finished in fir green, enabling them to assimilate with surrounding vegetation and reduce their visual presence at street level. The cabinets are positioned in a consolidated arrangement adjacent to existing highway infrastructure, ensuring a neat and organised appearance.

The proposal has also been carefully positioned to avoid unnecessary impacts upon pedestrian movement and the safe operation of the highway network. The installation is located within the highway footpath set well back from the roads edge and maintains appropriate separation from pedestrian routes whilst ensuring the continued safe operation of the surrounding highway environment.

With regard to the antenna arrangement, it is technically necessary for modern 4G and 5G antennas to remain unshrouded. The higher frequency bands utilised by contemporary mobile networks are unable to propagate effectively through materials that would be required to create a shrouded enclosure. Such an approach would compromise network performance and coverage, potentially necessitating additional infrastructure elsewhere to achieve the same level of service provision.

Furthermore, shrouding would significantly increase wind loading on the structure, requiring a larger and more substantial support pole than that currently proposed. The submitted design therefore represents the most efficient balance between operational requirements and visual considerations. To further improve appearance, banding has been incorporated between antenna apertures to create a more streamlined and cohesive visual form.

Whilst the installation will inevitably be visible within certain views from the surrounding junctions and streets, visibility alone does not equate to unacceptable harm. The proposal would be experienced within a heavily urbanised environment characterised by commercial development, transport infrastructure, street furniture and mature vegetation. In this context, the proposed street pole would appear as a logical and proportionate addition to the existing streetscene rather than an incongruous feature.

Overall, the proposal represents the least visually intrusive design capable of delivering the required level of coverage and capacity improvements. The

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development has been carefully sited and designed to minimise impacts upon visual amenity whilst meeting the operational requirements of the network. It therefore strikes an appropriate balance between technical necessity and environmental considerations and accords with both local and national planning policy objectives.

Residential Amenity

The proposal has been deliberately located within an established commercial and highway environment rather than within surrounding residential streets. This approach enables the required network coverage objectives to be achieved whilst minimising impacts upon nearby residents.

Whilst residential properties exist within the wider area, the proposed installation benefits from separation, screening and backdrop from the nearest residential frontages and is experienced principally within the context of Water Street and the surrounding urban environment. Existing buildings, highway infrastructure, mature roadside vegetation and intervening development all assist in reducing the visual prominence of the proposal when viewed from surrounding residential locations.

Importantly, the selected site avoids the need to introduce telecommunications infrastructure directly into nearby residential streets or cul-de-sacs. The site selection process demonstrates that alternative locations would result in a closer relationship with residential properties and a greater potential impact upon residential amenity. The selected Water Street location therefore represents the least harmful option from a residential amenity perspective.

The development will not result in any loss of privacy, overlooking, overshadowing or loss of daylight. Telecommunications installations of this nature are unmanned and generate no activity that would adversely affect neighbouring occupiers. The equipment cabinets contain cooling systems that operate only intermittently during periods of elevated temperature and are not audible beyond a short distance from the installation. Routine maintenance visits are infrequent, typically occurring once or twice per year using handheld equipment only.

Consequently, the proposal would not give rise to any material impacts relating to noise, disturbance, privacy, outlook, vibration, lighting or general residential amenity. The development therefore accords with the objectives of local and national planning policy relating to the protection of residential amenity whilst facilitating the delivery of essential digital infrastructure.

Sequential Test and Lack of Alternative Options

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This is a very defined search area. This is due to the limitations of 5G discussed throughout this document and the fact that the new site must be directly where the demand for service is. Simply put, the higher frequency cannot travel far or through material as well and so sites must be directly where the demand is.

The search area is made up of Castlefield Conservation Area, Water Street Regeneration Framework proposals, Public Open Space, traffic corridors, commercial and dense residential streets and cul-de-sacs, as well as the local canal and surrounding heritage assets. Great effort was made to identify a location that could still deliver the necessary service while minimising impact on these sensitive receivers.

There were 16 alternative options discounted in this very small and defined search area. These were discounted due to impacts on visual/residential amenity, pedestrian obstruction, impacts on heritage assets, and ICNIRP challenges.

The proposal is the least impactful, technically viable, location in the area – it is sited in a discrete setting with significant existing street furniture with which it will assimilate and natural vegetation for screening/backdrop.

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

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

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

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

Conclusion and Planning Balance

To conclude, there is a clear operational requirement to provide telecommunications infrastructure within Castlefield following the need to improve

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coverage and capacity in the area. Without the new infrastrucure, the area would experience a deterioration in network performance and capacity, adversely affecting residents, businesses, commuters, visitors and emergency communications users who increasingly rely upon robust digital connectivity.

The proposed development addresses this requirement by facilitating the continued provision of high-quality mobile communications services whilst also delivering enhanced 4G capability and modern 5G connectivity across the target service area. The proposal therefore directly supports national, regional and local objectives relating to the delivery of resilient digital infrastructure.

The selected Water Street site occupies a sustainable and appropriate location within an established urban and highway corridor. The surrounding area is characterised by high rise buildings, commercial development, highway infrastructure, street lighting columns, traffic signage, mature roadside vegetation and significant levels of vehicular activity. This established urban context provides a far more appropriate setting for telecommunications infrastructure than many of the alternative locations considered during the site selection process.

A comprehensive assessment of alternative options has been undertaken and demonstrates that the selected site represents the optimum balance between operational requirements and environmental considerations. Alternative sites were discounted due to a combination of planning, visual, operational, heritage, residential amenity, land availability and technical constraints. Importantly, a number of alternatives would have resulted in a closer relationship with residential properties, greater visual prominence or increased impacts upon the surrounding townscape.

The proposal has also been carefully designed to minimise visual impact. The 20m street pole represents the minimum height capable of delivering the required level of network performance whilst achieving the necessary operational and safety requirements. The slimline street pole design significantly reduces visual bulk when compared with alternative telecommunications structures such as lattice towers or open headframe installations. Appropriate colour treatments have been incorporated to assist assimilation within the surrounding streetscene and the associated equipment cabinets have been designed and positioned to minimise visual prominence at ground level.

Whilst the proposal will inevitably be visible within the public realm, visibility does not equate to unacceptable harm. The installation would be experienced within an existing urban environment characterised by commercial development, transport infrastructure and numerous existing vertical features. Consequently, the proposal would integrate appropriately into the established character of the area and would

not result in unacceptable impacts upon visual amenity, local character or townscape quality.

The development would also have no material impact upon residential amenity. The installation generates no significant noise or disturbance, results in no overlooking or loss of privacy, and has been deliberately located within a commercial and highway environment rather than within surrounding residential streets. The selected site therefore represents the least harmful option available from a residential amenity perspective whilst still meeting the operational requirements of the network.

The proposal accords with the objectives of the National Planning Policy Framework, the Manchester Local Development Plan and Places for Everyone, along with the saved UDP Policies, all of which recognise the substantial social and economic benefits associated with modern digital communications infrastructure. National policy is clear that advanced, high-quality and reliable telecommunications infrastructure is essential to economic growth and social wellbeing and that such infrastructure should be supported.

In planning balance terms, any limited and localised visual effects associated with the proposal are significantly outweighed by the substantial public benefits arising from improved network resilience, enhanced 4G services, new 5G connectivity, support for businesses, improved access to digital services and the continued operation of essential communications infrastructure within the area. Furthermore, the submitted site selection assessment demonstrates that no alternative site would deliver these benefits with a lower overall level of planning impact.

Accordingly, the proposal represents a well-considered, proportionate and policy-compliant form of development which has been carefully sited and designed to minimise impacts whilst delivering essential telecommunications infrastructure. The proposal therefore satisfies the relevant prior approval considerations relating to siting and appearance and is respectfully recommended for approval.

Confirmation that submitted drawings have been checked for accuracy

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Signed:	[redacted]	Date:	10/06/2026
Position:	Director	(on behalf of Cornerstone)	

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

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