



WRITTEN STATEMENT OF CASE

On behalf of Cornerstone

Appeal against the refusal by Rochdale Metropolitan Borough Council for the erection of a radio base station comprising the removal of existing 15m monopole supporting 3 no. antennas, 4 no. equipment cabinets, 1 no. electric meter cabinets and timber fence, installation of a new 12m pole with flood lights, 20m lattice tower supporting 6 no. antennas, 2 no. transmission dishes, 4 no. replacement equipment cabinets, 1 no. replacement electric meter cabinet, 2.0m palisade fence and ancillary development there to including Ericson Radio Systems (ERSs) and 1 no. GPS module.

Land at Rochdale RUFC, Clubhouse Close, Rochdale, OL11 5LU, NGR E: 387248 N: 413268

LPA REF: 25/00155/FUL

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1.0 INTRODUCTION

1.1 This statement considers the refusal of planning permission by Rochdale Metropolitan Borough Council for removal of an existing 15m monopole supporting 3 no. antennas, flood lighting equipment, 4 no. equipment cabinets, 1 no. electric meter cabinets and timber fence, installation of a new 12m pole with flood lights, 20m lattice tower supporting 6 no. antennas, 2 no. transmission dishes, 4 no. replacement equipment cabinets, 1 no. replacement electric meter cabinet, 2.0m palisade fence and ancillary development thereto at Rochdale RUFC, Clubhouse Close, Rochdale on behalf of Cornerstone. The compliance of the proposed development with the development plan and national planning guidance will be assessed together with any other material considerations.

1.2 The application for planning permission for a telecommunications mast, equipment cabinets and ancillary development was determined under delegated powers May 2025. The application was refused for the following reason (see Appendix CTL 1 for the decision notice):

1. *'The proposed installation, by virtue of its height, massing, siting and appearance, would represent an incongruous feature which would fail to sit sympathetically with the residential area and open character and appearance of the site. In the absence of a comprehensive assessment of alternative sites for the proposed development it is not possible to definitively conclude that there are no more suitable sites reasonably available that would result in a lesser degree of visual harm. The development would therefore result in unacceptable harm to character and appearance of the site and its surroundings and be contrary to policies P1, P3 and DM1 of the adopted Rochdale Core Strategy, Policies JP-P1 and JP-C2 of the adopted Places for Everyone Joint Development Plan and the National Planning Policy Framework'.*

1.3 This statement will demonstrate that:

- i) The proposed scheme fully accords with all relevant provisions of the statutory development plan and the National Planning Policy Framework;
- ii) The proposals in terms of height, appearance and siting have been minimised as far as reasonably practicable given this is a second submission in this location for the operator after re-considering the location and design;
- iii) The appeal proposal in terms of its height, siting and appearance would not constitute a significantly incongruous and dominant feature within the area to the detriment of visual

amenity. The appeal proposal would respect the context of the appeal site and the character of the surrounding area. As such, the appeal proposal would not have an unacceptable detrimental effect on the visual amenity of the locality or the character and appearance of the area. The proposal has been carefully sited, adjacent to semi-mature trees, situated in a sports ground where these types of installations are fairly common, and located as far away as possible from the residential nature of the area.

- iv) It is not feasible to upgrade and share the existing telecommunications structure as it is not structurally capable of supporting the equipment needed to provide three operators with multi technologies of 4G and 5G. Instead a replacement site has been identified nearby to allow 3 different operators to share one single installation.
- v) The top height of the proposed mast at 20m is the lowest possible that will enable the operator to provide equivalent 2G coverage; enhanced 4G coverage to the surrounding area; and enable new 5G coverage to be rolled out in this cell area without detrimentally affecting coverage. The Council has not taken sufficient consideration of the technical constraints of the operator; and the careful choice of design which is the only option available to the operator that will provide all legacy technologies as well as the latest 5G superfast connectivity to the area. The Council has not considered that this is an essential item of infrastructure which has to carry out a specific task. It is inappropriate to compare height of the proposed mast to the height of other surrounding monopoles, as they are older structures originally installed to provide previous generations of mobile coverage and are no longer operationally and structurally feasible to be upgraded. The design of the proposed lattice mast subject of this appeal is a functional and simple structure, which allows light to pass through it so it does not appear overly bulky when viewed from the surrounding area;
- vi) The appeal proposal will support economic growth, limit visual harm and is the best option to meet the ever increasing demand for improved mobile communications coverage in the local area. This will outweigh the perceived harm to the surrounding area;
- vii) The Council has not carried out a full balancing exercise taking all material considerations into account including the significant social and economic benefits of the proposal, nor has it fully taken into account the operator's technical constraints, or the legal requirements to provide a high-quality service and meet the customers' reasonable demands including access to the latest mobile communications technologies. Similarly, the LPA has not thoroughly taken account of the Greater Manchester Strategy, Infrastructure Framework, Digital Blueprint, Local Industrial Strategy and the Places for Everyone Joint Development Plan which fully support developing and improving infrastructure to promote connectivity and mobility including bringing

forward access to the latest superfast mobile broadband technology to support the needs of business and residents. These benefits are strong material considerations which outweigh any perceived harm to the character and appearance of the surrounding area;

- viii) Access to the latest superfast mobile technology in the form of 5G coverage is a strong material consideration in the determination of this proposed telecommunications installation.
- ix) A thorough search of the area has confirmed that there are no more suitable, available sites within the operator's cell search area. The search area is constrained due to the need to replicate and upgrade the established coverage footprint provided from the existing monopole on site. The existing base station forms part of a network of sites in the wider area to ensure continuous coverage. Moving the location of the existing base station could result in coverage gaps in the surrounding area and a duplication of existing coverage provided by adjacent base stations in the wider area. This is in contrast to the local planning authorities assessment which concludes there is no thorough justification for why alternative ground or rooftop based sites in the wider area haven't been provided as part of the proposal.
- x) The appeal proposals will not cause any unacceptable harm to the character and visual amenity of the area when weighed against the significant benefits associated with the provision of the latest high quality mobile communications services to VMO2 and VodafoneThree customers in the surrounding area, and as such planning permission should be allowed.

Procedural Matters relating to the VodafoneThree merger

In May 2025 Vodafone and Three joined together under the VodafoneThree merger. Following a nationwide upgrade and consolidation process, this will eventually allow for any Vodafone or Three user to benefit from the coverage provided by any Vodafone or Three installation in their area, including existing and proposed masts. Both companies are set to invest £11 billion in the roll out of 5G, to achieve the goal for full nationwide 5G standalone coverage by 2034. In turn this will improve network quality and coverage for both operators' users including those who buy space off each network.

The planning application was submitted and determined prior to the VodafoneThree merger being formally announced and as such, the planning statement submitted as part of the application did not refer to the merger. The planning application was submitted on behalf of Cornerstone rather than the individual operators. It is therefore considered that the appeal can be determined in line with the change in reference of Vodafone to VodafoneThree following the merger.

2.0 SITE AND SURROUNDINGS

- 2.1** The proposed site is located on land which is not operationally used by Rochdale RUFC. The site is located on the western side of the rugby field, situated adjacent to semi-mature trees, bushes and shrubs. The proposed compound would be positioned on the site of the existing equipment compound site, next to the existing storage container (to the west of the existing monopole that will be removed). The surrounding area is predominantly recreational in nature with residential properties to the east and south of the rugby club.
- 2.2** Immediately east of the site is the rugby playing field and beyond that is Clubhouse Close which is a single track road leading to the Rugby Union clubhouse. Further east of Clubhouse Close are residential properties sited along Hands Lane. Along the western edge of the rugby pitch are 3 no. existing 15m monopoles with shrouded antennas, one of which currently serve the operators of this proposal. There is a small play area and outside seating area to the north of the site followed by the two storey rugby clubhouse and its accompanying car park. Further beyond the club car park are semi-mature / mature trees and Rochdale Golf Course.
- 2.3** Immediately west of the proposed site are semi-mature trees rising to some 8m in height along with areas of bushes and shrubs, and beyond that are additional playing fields surrounded by trees. There are residential properties further west (along Swallow Drive), however these are situated circa 300m away from the proposed site. South of the proposed site is a semi-mature tree that rises to some 10m in height, with rear elevations and gardens of residential properties beyond.
- 2.4** The appellant has carefully chosen the appeal site as it is set back from the nearest highway, and residential properties and will be viewed in the context of other vertical elements in the landscape. The proposed site provides a similar separation distance from residential properties compared to the existing pole that will be replaced, albeit in a location that benefits from a higher level of visual screening provided by surrounding trees. The new installation needs to be at least 20m in height to ensure the whole of the operators antennas are clear of the surrounding trees and building to enable coverage to be provided to the target coverage area and provide a clear line of sight for transmission backhaul into the operators surrounding networks.

3.0 PLANNING BACKGROUND AND HISTORY

Background

- 3.1** Cornerstone and Virgin Media O2 (VMO2), known as O2 in the UK, are in the process of progressing a suitable replacement site in the Bagslate Moor area of Rochdale for a radio base station capable of providing their latest 4G and new 5G technologies. The existing Cornerstone site on Rochdale RUFC (see image 1 below) that is currently being utilised by both VMO2 and Vodafone needs to be replaced to provide three operators the ability to upgrade their equipment to enable the latest 5G coverage in the surrounding area.
- 3.2** The existing site that will be replaced has come to the end of its natural lifespan and is not structurally suitable to host the new 5G technologies. Explained in more detail later in this statement of case, the existing monopole cannot be used to support three operators' heavy equipment and associated feeder cables. Therefore the operators will continue to share the one mast to minimise proliferation, in line with government guidance.
- 3.3** ThreeUK will retain their existing monopole in place at the northern end of the rugby pitch for the time being whilst they configure their network with Vodafone following the recent merger. This ensures that existing ThreeUK customers in the surrounding area will benefit from continuous coverage and capacity whilst the operators evaluate their merged network requirements and abilities. Should the existing ThreeUK equipment become redundant in the future, it will be removed and the ground reinstated, in line with planning and license requirements



Image 1: Existing site location at Rochdale RUFC

- 3.4** As part of Cornerstone's continued network improvement program, there is a specific requirement for a new installation at this location to maintain 2G coverage and capacity, improve 4G and provide new 5G coverage and capacity, ensuring that this area of Bagslate Moor to the west area of Rochdale has access to the latest technologies. This follows the inability, from a structural perspective, to upgrade the existing sites VMO2 and VodafoneThree have adjacent to the field of the rugby pitch.
- 3.5** There is also a requirement to improve coverage speed and network capacity in this area due to increased traffic experienced by the operators, which is leading to dropped calls and buffering.
- 3.6** Cornerstone requires new 5G coverage to be installed into its network in this cell area to meet the ever increasing demands for high quality mobile communications. However, the existing installation at Rochdale RUFC is not designed to be able to support three operators equipment (VodafoneThree and VMO2's 5G antennas) on one installation. A streetwork style mast cannot be shared by 3 different operators. Therefore, the operators have decided to continue to share one site. It has been moved away from the pitch side to be adjacent to semi-mature trees to provide screening. These two structures would have a much greater impact on the visual amenity of the area than the appeal proposal. Therefore, VMO2 is looking to continue to share

with VodafoneThree to provide and extend their coverage at this location with a new radio base station, to upgrade its 4G technologies and provide a new 5G service in this area of Bagslate Moor.

- 3.7** The operator is limited in siting options as there is a requirement to provide equivalent replacement coverage and capacity for this largely residential area, currently without 5G coverage and lacking sufficient 4G capacity. The replacement of coverage currently provided by the existing site at Rochdale RUFC means that the operator has to be located as close as possible to the existing installation in order to maintain the provision of equivalent coverage and capacity to the surrounding local area and fit into the Operator's network of sites in the wider area. The proposed location subject of this appeal is adjacent to the existing radio base station.
- 3.8** This is due to the residential nature of the search area to the south, access issues to the north and west but the main reason being, the operator needs to provide coverage to the aforementioned residential area. Anything further north or west would mean that sections of the residential area would not have access to the network. This is the nearest suitable location that the operator is able to position their replacement apparatus, largely due to the lack of suitable buildings, lack of space, and being too far away from the target coverage area (residential area), and other potential sites being surrounded and directly overlooked by residential properties in all directions with no screening.
- 3.9** 3G (and eventually 2G) is being switched off by the operators in order to repurpose these radio frequencies for faster more energy-efficient 4G and 5G services. 3G is primarily used for mobile data services. It is being switched off first because it has already largely been superseded by 4G. Hence the importance of providing the latest 4G and new 5G service provision in areas where there is no such coverage. 3G has already been switched off by VodafoneThree and EE in early 2024, and VMO2 is planning to do the same. Whilst no firm timescales have been announced as to when this will occur within the Greater Manchester region, it has been confirmed it will occur during 2025. As a result, it is imperative that the operator builds resilience into the network.
- 3.10** Cornerstone is the UK's leading mobile infrastructure services company. They acquire, manage and own over 20,000 sites and are committed to enabling best in class mobile connectivity for over half of all the country's mobile customers. They oversee works on behalf of telecommunications providers and wherever possible aim to: promote shared infrastructure, maximise opportunities to consolidate the number of base stations and significantly reduce the environmental impact of network development. Whilst it is the case that Cornerstone remains

committed to the promotion of shared infrastructure for 2G and 4G coverage, this can no longer be the case with all sites for the provision of 5G service due to the additional equipment requirements and the structural capacity of streetworks style masts.

- 3.11** Mobile connectivity and service is required where customers live, work and play. 5G coverage and superfast mobile broadband data capacity demand will continue to increase exponentially with the introduction of IoT (Internet of Things), machine to machine connectivity, automated transport/industry and other 'smart' applications. To this end, the existing shared infrastructure within the built environment has had to be reviewed and adapted as appropriate.
- 3.12** In those instances where greenfield structures and rooftop installations are currently in place, in the vast majority of cases, these will remain shared base stations. These shared base stations allow for separate antennas on supporting structures that are capable of accommodating the weight, wind loading and technological requirements associated with providing multi advanced technologies including the latest 5G service provision for two separate operators from a single shared location, albeit sometimes via redevelopment of the existing base station.
- 3.13** However, to address some site specific coverage and data capacity demand, the 5G equipment upon streetworks style base station structures cannot be shared by three operators. This is due to variations in the make-up of the independent VodafoneThree and VMO2 networks and the structural capacity of the streetworks style poles. As noted, most infrastructure should be capable of sharing, however, the slimline street furniture style base stations that are currently in place are not capable of accommodating all of the equipment that is required to meet the site specific demand of three operators and customers for this area from a single street furniture pole. Therefore, the operators have decided to share a greenfield structure, rather than have two individual columns in this location to reduce the proliferation in the area.
- 3.14** Given the maturity of the mobile base station networks, any new radio base station needs to be located in close proximity to the existing sites – thereby retaining customer coverage and experience currently being experienced in this location. The new tower will accommodate all the technologies for three operators and the shared 'cell' will benefit from improved service provision from three operators, including the introduction of 5G service to the area. It is considered that a lattice tower at this location, is a more appropriate and sensitive solution to 5G service provision in this rural area.
- 3.15** The enclosed coverage plots (see Appendix CTL 2) indicate the existing and proposed

coverage for 5G technology within the target coverage area. The replacement site is designed to replicate the existing service provision for 2G and 4G in this cell area whilst at the same time providing new 5G coverage and capacity. The plots illustrate specifically the 5G service provision that will be provided by this replacement site. However, the operators are looking to use the coverage footprint of existing sites as a guide for providing 5G services in each cell. Thus, they are indicative that where 5G coverage is provided from this location then the 2G and 4G service provision will be similarly shown.

- 3.16** As can be seen from the coverage plots, existing 5G coverage is non-existent in and around Bagslate Moor and Broadhalgh, depicted by the lack of colouring on the map. The proposed installation would provide high quality, reliable, advanced indoor 5G coverage in this area of Bagslate Moor and Broadhalgh, illustrated by the red colouring which indicates urban indoor coverage, the green colouring shows suburban indoor coverage. This would provide significant social and economic benefit to the residents and businesses in the wider area, in line with Government policy to provide high quality communications services across the UK.
- 3.17** The appeal site will therefore meet the demand for high quality, advanced, reliable 5G service provision around Bagslate Moor and Broadhalgh including the densely populated urban area south east / west of the site towards Bamford, north towards Shawfield and south along the A58.
- 3.18** The coverage plots cannot illustrate the uplift in user capacity of the site which the surrounding sites in the network cannot fill. The term 'Capacity' refers to the fact that each base station can only provide service to a certain number of users at any one time. When this 'Capacity' is exceeded, although 'Coverage' remains present, the base station cannot provide service to any additional users and calls/text/data usage in the area would become unavailable.
- 3.19** 5G service provision is not just about coverage, it is about capacity through the many layers of technology the operator provides to their customers to deliver a better quality experience, greater data speed upload and download, as opposed to waiting for a file to download or a map to get from A to B (on the network) due to congestion.
- 3.20** The operators' license obligations requires them to meet customers "reasonable demand". Reasonable demand would be to provide the latest technologies including 5G as customers expect to be able to use their smart 5G enabled devices wherever they are located whether that is indoors or outside. The operators also have a market driven "requirement" to provide a high quality service as well as a license obligation to provide indoor 2G/4G and 5G services.
- 3.21** Without this proposed installation, the opportunity to provide the latest high-quality

communications infrastructure (which the Government acknowledges as being essential for sustainable economic growth) to this area will be lost. The ability to develop high speed telecommunications networks and expand these networks, which is known to play a vital role in enhancing the provision of local community facilities and services, will also be lost. Therefore, without the proposed development subject of this appeal, Bagslate Moor will fall behind the rest of the Greater Manchester area where 5G installations have been approved as well as other parts of the country and will not encourage economic growth, but instead detrimentally reduce the community facilities and services available in the area. This is contrary to Government aspirations for the UK to be a world leader in 5G and for communities to benefit from the investments in the new technology. The Government places significant importance on 5G and advanced, reliable, high quality 5G technology. It will also be contrary to the aspirations of Greater Manchester city-region to '*upgrade, integrate and future-proof its infrastructure, to create a 21st century city-region with extreme digital connectivity*' (Greater Manchester Local Industrial Strategy).

- 3.22** There are only four UK mobile networks: VMO2, Vodafone, EE and Three. All the other providers piggyback i.e. buy space from one of these four networks e.g. Giffgaff, Tesco Mobile, and Sky Mobile are on the VMO2 network, VOXI, Asda Mobile, Lebara Mobile and Talkmobile are on the Vodafone network. If the parent network does not have coverage (or capacity) then neither will the Mobile Virtual Network Operator's (MVNO) that borrows network space from the parent network. Therefore, this does not provide the consumer with a full choice for their service provision.
- 3.23** The inability to deploy the equipment subject of this appeal will also be anti – competitive as VMO2 and VodafoneThree will not be able to provide a 5G service in this area which is contrary to NPPF which states that local planning authorities should not seek to prevent competition between different operators. If a new base station site is not allowed for this operator at a technically suitable and available site then VMO2's and VodafoneThree customers will be limited to using only EE as a service provider. They will also not have the full range of Mobile Virtual Network Operator's (MVNO) available to them.
- 3.24** With the advent of smartphones, the demand for 4G and 5G coverage is increasing and therefore the network providers are obliged to improve their network coverage to their customers, in line with their license obligations. This significant lack of 5G coverage is clearly shown on the coverage plots. A copy of these coverage plots is enclosed at Appendix CTL 2.
- 3.25** Given the huge social and economic benefits of connectivity, providing 'advanced, high quality

and reliable communications infrastructure' is a key Government priority, set out in the NPPF, the Joint Department for Culture, Media and Sport (DCMS) and Ministry of Housing, Communities and Local Government (MHCLG) statement, Department for Business, Energy and Industrial Strategy 'Building a Britain Fit for the Future' Ofcom Infrastructure reports 2016-2022, National Infrastructure Delivery Plan 2016-2021, DCMS' 'Digital Connectivity Portal' and the UK Wireless Infrastructure Strategy. The former DCMS and MHCLG departments have called upon Local Authorities in their role as landowner, policy and decision maker to work collaboratively with the digital communications industry to minimise barriers to deployment and the delivery of the essential infrastructure which provides the reliable mobile digital connectivity which underpins Government aspirations.

3.26 DCMS "Digital Connectivity" states:

"Digital connectivity is – now, more than ever – vital to enable people to stay connected and businesses to grow. The demand for mobile data is increasing rapidly, and the COVID-19 pandemic has highlighted how important it is that we all have access to reliable, high quality mobile connectivity.

The Government is committed to extending mobile network coverage across the UK and providing uninterrupted mobile signal on all major roads, and our ambition is for the majority of the population to have access to a 5G signal by 2027".

3.27 Section 10 of the NPPF relates to 'Supporting high quality communications' and 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...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)".

3.28 BEIS Industrial Strategy – Building a Britain fit for the Future 2017 states:

"Over the course of 2016, the UK took another step forward in the coverage of its fixed and mobile communications. More people are, or can be, connected to the communications they need, and they are consuming more data as fixed and mobile services become increasingly woven into the fabric of their daily lives and work".

3.29 Connected Nations is an annual report on progress in the availability of broadband and mobile

services in the UK, including the roll out of mobile 5G networks. The 2024 report was published in December 2024 (first published December 2019). These reports support Ofcom's objective of making communications work for everyone, including to promote reliable, widely available, and high-quality networks. Within the summary of findings it notes 5G connectivity continues to expand with mobile network operators (MNO's) coverage ranging between 61% and 79% outside premises. However, 5G coverage where all MNO's are present outside premises remains low at 38%. (See Appendix CTL 3 for relevant extracts).

- 3.30** The current Connected Nations report provides update data on the coverage and usage of fixed broadband and mobile networks within the UK. This includes updates on take-up of services on full-fibre and gigabit-capable networks, reporting on the further development of 4G networks and progress on the rollout of 5G networks.
- 3.31** The report recognises that mobile connectivity has become an integral part of modern living; it enables effective communication, provides access to information and services, enhances productivity, and supports various aspects of daily life.
- 3.32** The latest report found that the availability of 5G continues to grow steadily. 5G continues to reach a growing number of consumers, with around 50% of mobile handsets now 5G capable and notable increases in coverage observed across the UK. The availability of 5G, where consumers are likely to a 5G network, continues to grow, although it varies by MNO and geography. In 2024, there has been an increase in 5G coverage across the UK, with 95% (High Confidence) and 90% (Very High confidence) 5G coverage in areas outside of premisses where it is available from at least one MNO. This is an improvement from 93% and 85% respectively in 2023.

	5G outside premises (MNO range)	4G outside premises (MNO range)	4G geographic (MNO range)	4G total not spots	Voice and text total not spots
UK	61-79%	99-99+%	88-89%	5%	3%
Scotland	54-76%	99-99+%	77-80%	11%	7%
Northern Ireland	36-90%	98-99%	89-95%	2%	<1%
Wales	16-80%	98-99%	83-89%	5%	3%
England	65-81%	99-99+%	94-96%	1%	1%



Source: Ofcom analysis of MNO predictions (September 2024)

Figure 1: Ofcom analysis of MNO predictions (source: Connected Nations report 2024)

- 3.33** The footprint where all MNOs provide 5G coverage remains considerably lower. However, it has increased, now covering outside 38% of premises at the High Confidence level and 19% at the Very High Confidence level, up from 25% and 16% respectively last year.
- 3.34** The report also notes that while 5G coverage is expanding, the most people still use voice and data services over 4G. Overall, 4G geographic coverage across individual MNOs in the UK has increased significantly since 2023, rising from a range of 80-87% to 88-89% this year. 4G geographic coverage where it is available from at least one MNO has now reached 95% compared to 93% in 2023. As the majority of the UK landmass is rural, rural coverage levels are similar to overall UK levels, while urban areas report moderately higher geographic coverage.
- 3.35** The report notes that 4G coverage is predicted to be available inside vehicles on motorways and A roads across individual MNOs in a range of 89-92%. This falls to a range of 80-83% for B roads. Outside vehicles, 4G coverage on motorways and A roads ranges between 98-99% across individual MNOs, compared to 94-98% in 2023, and between 95-96% for B roads, compared to 90-95% in 2023.
- 3.36** The Connected Nations 2024 report states that 3G and 2G switch-off is underway. All MNOs made a commitment to the Government to switch off their 2G and 3G networks by 2033 at the latest. This will result in improved network efficiency and enable more spectrum to be used for 4G and 5G services.
- 3.37** 5G traffic has shown the highest growth from 151 PB in 2024 to 227 PB in 2024, an increase of around 50%. This data traffic was generated from a device pool which now includes at least 50% 5G capable handsets (up from around 43% in 2023) and represents around 21% of the total monthly mobile traffic, up from around 17% in 2023. 14% of this traffic is 5G standalone, which is around 3% of overall monthly mobile traffic in the UK. While 5G traffic has increased rapidly, 4G continues to carry most of the mobile data traffic, accounting for around 78% of total monthly data traffic (a decrease from 81% reported in 2023).
- 3.38** The Connected Nations Report 2024 also contains an interactive map which shows mobile coverage for the local authorities throughout the UK. Figure 2 below shows the coverage of landmass, premises and roads by mobile networks for voice, data and 5G (in Rochdale) with a very High Confidence for all MNO's. The line chart below shows coverage over time for all 4 operators since May 2022. As can be seen, there was an incline since April 2023 showing the investment the operators are contributing to the Rochdale region.

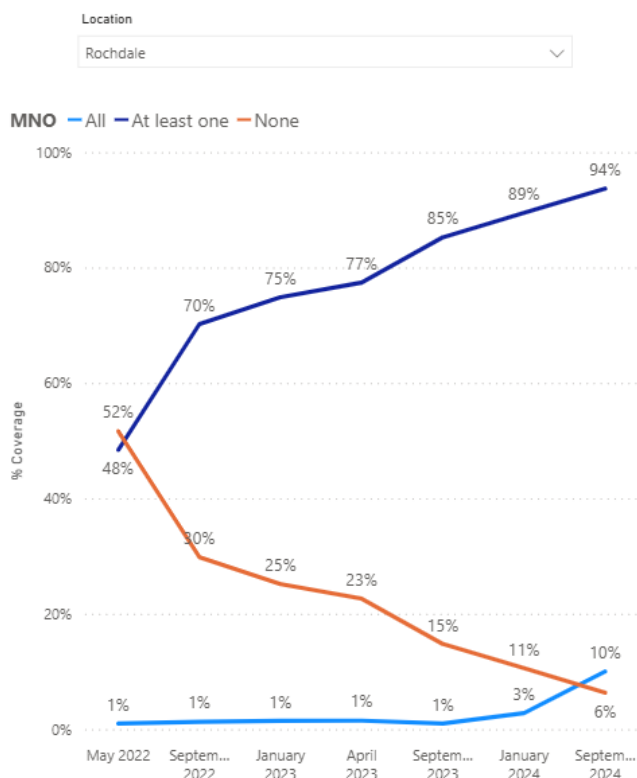


Figure 2 indicating the 5G (Very High Confidence) geographic coverage for mobile networks between May 2022 and September 2024 in Rochdale.

- 3.39** As can be seen from Figure 2 above, there is 94% of 5G geographic coverage for at least one of the four main operators in Rochdale. However, this drops down to 10% for all operators and 6% of Rochdale has no 5G coverage at a Very High Confidence level. This has significantly dropped in the last year by 9%. The appeal site would help reduce this gap in 5G coverage to this area of Rochdale.
- 3.40** The previous Ofcom Connected Nations 2023 Report also noted key points within mobile networks and 5G uplift in technology (See Appendix CTL 4 for extracts).
- 3.41** The report notes that over the last few years, the availability and take up of superfast and ultrafast broadband and the coverage and take-up of 5G mobile services have dramatically increased. The UK holds a leading position on current 5G mobile network coverage compared with other large European countries. It highlights that this demonstrates that policy and regulatory decisions made in the past few years have supported investment in new networks and technology and delivered a good outcome for consumers.
- 3.42** The Report goes on to state in the Overview that:

'5G traffic has shown around 140% growth, rising from 63 PB in 2022 to 151 PB in 2023. This data traffic was generated from devices, of which at least 43% are 5G capable handsets (up from around 20% in 2022). Traffic on 5G capable handsets represents around 17% of total mobile traffic, up from around 9% in 2022.'

- 3.43** The Report notes that the MNOs have started to switch off their 3G networks. The number of customers using devices reliant on 2G and 3G connectivity has fallen sharply, from approximately 5.5 million reported last year to 2.4 million this year, of which just over half a million are residential customers with a 3G device. Less than 3% of all data traffic is now carried on 3G networks, with 3G data traffic having decreased by an average of 44% year on year. This emphasises the importance of building a resilient network with the latest 4G and new 5G service provision. Otherwise, this cell area will fall behind others and dropped calls and buffering will become more prevalent.
- 3.44** The key 2020 report notes 60% of the consumer market consider Smartphones are now the most important device for internet access.
- 3.45** In September 2019, 81% of all measured time spent online was on a mobile device (both tablet and Smartphone).
- 3.46** Figure 3 below indicates the most-missed device among adults: 2014-2019 were it be taken away from them. As can be seen, nearly half of all adults say that their mobile device is the device they would miss most were it taken away from them.

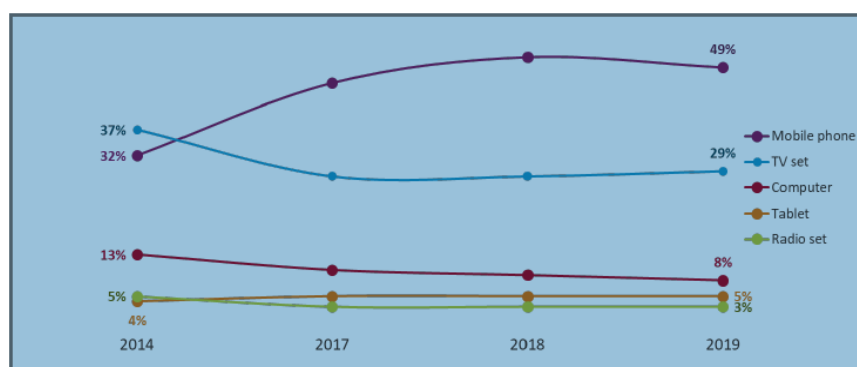


Figure 3 - Most-missed device among adults. Ofcom Adults' Media Literacy Tracker 2014-2019

- 3.47** As highlighted in the Connected Nations England 2023 Report the 2G and 3G coverage networks are planned to be switched off by all Mobile Network Operators (MNOs) by 2033 at the latest. 2G and 3G services launched in the 1990s and 2000s respectively and running

these networks alongside newer 4G and 5G services involves increased operating costs, as well as a less efficient use of spectrum and energy. Moving away from these older technologies will improve network efficiency and enable more spectrum to be used for 4G and 5G services. The MNOs are developing plans to switch off their 3G networks first, in line with Government guidelines, with each MNO setting its own timetable. As such, it is imperative that the MNO's make provision for this switch off to ensure that customers are not unduly affected, by upgrading their existing sites for the latest 4G and 5G coverage and providing new radio base stations where appropriate for such service provision.

3.48 The Online Nation 2024 report (updated November 2024) (see Appendix CTL 5 for extracts) sets out an overview of the UK online landscape in 2024, exploring both children's and adults' use of and experiences on online services. For most people in the UK, being online is a major part of daily life. Being online allows people to connect with others, sometimes in ways they may not be able to do offline. Data shows how we benefit from a range of online services, from messaging and calling platforms to gaming platforms, online news outlets and online shopping.

3.49 The 2024 report found that three quarters of the time spent online per day in May 2024 by adults was on smartphones. See Figure 4 below.



Source: Average daily time spent online by device - Ipsos, Ipsos iris Online Audience Measurement Service, May 2024, age: 18+, UK internet users. Note: custom data supplied by Ipsos. Time spent online includes personal use and in some instances those who also use their device for work. UK home internet access - Ofcom Technology Tracker 2024. QE1: do you or does anyone in your household have access to the internet at home (via any device, e.g. PC, mobile phone etc.), and if so, do you personally use the internet at home? Base: all respondents aged 16+, UK.

Figure 4 above reproduced from Online Nations 2024 Report

- 3.50** UK adults spent an average of 4 hours 20 minutes a day online in May 2024. Young adults spent the most time online, with 18-24-years-old spending a daily average of 6 hours 1 minute online, and those aged 65+ spending the least time online (3 hours 10 minutes).
- 3.51** In May 2024, 75% (3 hours 15 minutes) of the time spent online per day by UK adults, across smartphones, tablets and computers, was on a smartphone. The average time spent online on computers and tablets was identical at 32 minutes daily, with older people (65+) tending to spend more of their time online on tablets, and young people spending relatively more of their time on computers. The 25-34-year-olds spent the greatest proportion of their time online on smartphones, at 83% while those aged 65+ spent the least time via smartphone, at 56%.
- 3.52** In keeping with previous years, Alphabet, which owns Google and YouTube, remained the organisation whose sites and apps are most visited by UK adults, reaching almost all UK online adults (99%) in May 2024, maintaining the levels seen in 2023 (99%). Meta, the owner of Facebook, Instagram and WhatsApp, followed close behind, with its sites and apps visited by 96% of UK online adults (May 2023: 97%). The sites and apps of Amazon, Microsoft and BBC were the third, fourth and fifth most visited, visited by 90%, 87% and 83% of UK online adults respectively. The top five most-visited organisations were the same for all UK nations.
- 3.53** UK online adult smartphone users used on average 38 apps on their smartphones in May 2024, up from 36 in May 2023. All adult age groups saw an increase in the average number of apps used on smartphones between May 2023 and May 2024 except 18-24-year-olds, who used one fewer app than the previous year, and 18-24-year-olds used the fewest apps of any age group except those aged 55+ - perhaps surprisingly, since the 18-24 age group spent the most time using smartphones.
- 3.54** Ofcom research found that 41% of UK internet users aged 16+ said they had used a generative AI tool in the past year, with 18% of those aged 16+ saying they had used a generative AI tool in the past month. Internet users aged 16-24 were the most likely to say they had used a generative AI tool in the past year (78%) compared to all other age groups.
- 3.55** Ofcom's survey found that 33% of UK online aged 16+ said that they had used ChatGPT in the past year, with a long tail of other generative AI tools reaching 15% or less. Ipsos iris data found that 9% (4.2m) UK online adults aged 18+ visited ChatGPT in May 2024, increasing to 11% (5.0m) in August 2024. ChatGPT's adult reach was highest among UK online 18-24-year-olds (27%, 1.4m) in May 2024. However, while reach to those aged 25+ remained relatively stable in the following two months, reach to 18-24-year-olds declined by 16% (-226k). This

may be partly because this time period marked the end of the academic year, with this age group potentially having less need to find information or content relating to their education. The notable increase in reach, particularly to 25-34 year olds, in August 2024 compared to previous months, may partially be attributed to the publicity generated by OpenAI's announcement on 25 July of its SearchGPT Prototype – a search designed to combine OpenAI's models with information from the web.

- 3.56** Meta-owned WhatsApp (web or app) continued as the highest-reaching messaging service, reaching 87% of UK online adults in May 2024. Sixty-four per cent of UK online adults accessed WhatsApp per day in May 2024, an increase of 6pp compared to May 2023 (58%). Ofcom's survey similarly found that 86% of UK internet users aged 16+ had used WhatsApp in June 2024, followed by Facebook, Messenger with 59% and Instagram direct messages with 30%.
- 3.57** Ofcom's OET found that, when asked to consider the impact of being online, the majority (67%) of adult internet users agreed that for them personally, the benefits of being online outweighed the risk, with just 7% disagreeing. Although, the majority recognised the benefits, the proportion doing so had decreased since the previous two waves of the tracker, from 71% in June 2023 and 68% in January 2024.
- 3.58** The operator not only has a license requirement to provide a certain level of 2G/4G coverage to the population the appellant is obliged to meet the growing consumer demand for 5G coverage, especially as more people are purchasing 5G enabled devices, in line with their license obligations and the operators competitive market driven "requirement" to provide a high quality service. Customers expect to be able to access their portable hand held devices wherever they are, whether that be indoors or outside. There is currently no 5G service provision that is provided by VMO2 or VodafoneThree in this cell area. This gap can only be filled by providing a new installation within this locality, so that it can link up with the next cell and provide continuous coverage for the appellant's network and those MVNOs who buy network space off them.

Technical Justification

- 3.59** A mobile phone transmitter is designed to cover a specific area and links its coverage to the next site in the network, creating a patchwork of overlapping coverage 'cells' across the country. So, if a person is on the move, the network will transfer their calls from one site to the next. However, in certain areas there will be gaps between these cells, resulting in a loss of coverage. This can be for a variety of reasons, the most common being topography or

buildings which block the path of the signal. The operators' network rollout programme is designed to identify and address these gaps within their coverage and ensure that people can use their phones whenever and wherever they are.

- 3.60** There is a specific requirement for a new radio base station at this location to allow VMO2 and VodafoneThree to provide the latest 4G service provision and new 5G coverage and capacity to this area of Bagslate Moor, as well as replacement 2G and 3G service provision.
- 3.61** The need for indoor 5G as well as 4G coverage is becoming ever more necessary and significant especially with the growth in the smartphone take-up which has significantly altered consumer use of mobile data services, and the switching off of the 3G network by the operators in order to repurpose the radio frequencies to faster more energy-efficient 4G and 5G services. Mobile phone connectivity is becoming increasingly important as more people use mobile devices to carry out everyday tasks such as banking, entertainment and keeping in touch with friends and relatives. There are significant economic benefits to having usable and reliable mobile coverage, keeping in touch on the move and allowing machines to share real time information. It is essential that the UK has the mobile connectivity to allow people and 'things' to connect reliably where they are located.
- 3.62** An installation located outside of this search area would not allow the operators to provide their desired level of new 5G coverage, enhanced 4G service provision or replacement 2G and 3G coverage and therefore would not adequately fill the current 5G coverage gap. It would fail to reach the target area of the residential properties to the east and south of the site. Continuous coverage is also required in order to ensure that calls are not 'dropped' within the operators target coverage area.
- 3.63** It is extremely important to remember that due to the physics of radio frequency, each base station can only provide service to a limited geographic area, and this is reduced further by topography and population density, amongst other things such as 'clutter' which is a technical term referring to near or distant line of sight obstruction or 'clutter' between the base station and the areas it is trying to provide service to. This 'clutter' can take the form of high trees or buildings in the wider area which obstruct the signal and severely disrupt the service or make a base station redundant entirely.
- 3.64** The fact is, these base stations are required where the service is required, where there is a population who demand service provision, placing an installation a distance away from a population means the installation cannot provide the service to where it is needed.

Relevant Planning History

- 3.65** A formal pre-application consultation letter and set of plans was originally issued on 20th November 2024 to the Planning Department informing them of a requirement to erect a new 20m radio base station at the appeal location in order to provide the latest 4G service provision and new 5G coverage to this part of the borough. Enclosed with the letter were a set of plans detailing the proposed scheme. No specific response was received from the LPA.
- 3.66** At the same time, an initial community consultation exercise was undertaken with the local ward councillors for Bamford (Cllr Stephen Anstee, Cllr Philip Beal and Cllr Angela Smith), the Heywood and Middleton MP Elsie Blundell, Headteacher and Chair of Governors for Redwood Secondary School and Oulder Hill Leadership Academy on 20th November 2024 which included a consultation letter and set of proposed plans.
- 3.67** A response was received from all the Councillors, they suggested further engagement with local residents so they were able to offer their comments (see the pre-application consultation letters sent to local stakeholders submitted as part of the application documentation for the full response).
- 3.68** In accordance with the Code of Practice for Wireless Network Development in England (March 2022), pre-application consultation has been carried out with key stakeholders including local ward Councillors, local MP and Local Planning Authority. Paragraph 84 states:

“For some applications, it may be appropriate for the operator to consult with local residents. For example, a greater level of community consultation may be considered for a new site or where there is a high-level of community interest in development, though the type of engagement should be considered on a case by case basis. Operators should discuss and agree this requirement with the local planning authority. Forms of community engagement which may be appropriate include:

- *Consultation/Notification letter to local residents, communities and their representatives, including parish and town councils*
- *Site Notice*
- *Key stakeholder briefing*
- *Leaflets”*

- 3.69** The site is an upgrade to an existing radio base station on private land, therefore it is deemed pre-application consultation letters to the ward councillors and local MP who represent the local area was appropriate consultation. There was also the acquisition surveyor’s signature including contact details at the bottom of the pre-application consultation letter which are

available for residents as a point of contact. Therefore, no further engagement occurred with residents.

- 3.70** There was a previous proposal for a 20m lattice tower, supporting 12 no. antennas on an open headframe in exactly the same location for three operators. This was submitted on 05th August 2022 and given the reference LPA ref: 22/01192/FUL. The application was subsequently refused on 01st March 2023 for the following reason (see Appendix CTL 6 for a copy of the decision notice, delegated report and copy of the plans):

“The proposed installation, by virtue of its height, siting and appearance, would represent an incongruous and dominant feature of the street scene in a prominent residential location. Furthermore, no thorough justified information in relation to alternative ground or rooftop based sites has been provided as part of this proposal, required under paragraph 117 of the National Planning Policy Framework. The development would therefore result in unacceptable harm to the street scene and visual amenity generally and be contrary to policies P1, P3 and DM1 of the adopted Rochdale Core Strategy and the National Planning Policy Framework”.

- 3.71** Since this previous refusal, there have been significant Government pushes to speed up the roll out of 5G connectivity. Many MP's and Government publications deem the roll-out of 5G too slow and have urged Council's to take into account the technical constraints of telecommunications masts and the economic benefits of improved connectivity that will be explained later in this appeal statement.

- 3.72** Not only was there significant planning policy changes relating to telecommunications since the existing radio base stations have been installed, but the actual technologies have been upgraded. 4G was launched in 2012 and 5G in 2019. These new technologies have greater technical constraints including their ability to propagate. As new technologies were launched, they were allocated higher frequency bands by the Government. As explained later in this appeal statement, the higher the frequency bandwidths allocated to the operators by Ofcom, the more attenuation of the antenna signal there is. Thus, a need for taller masts. Inspectors now attach significant weight to the lack of coverage and capacity, the social and economic benefits of providing high quality and multiple technologies i.e. 2G, 4G and 5G rather than 2G and 3G (which is no longer available) alone which would not enable most handheld devices to work on the internet due to a lack of capacity for data usage.

- 3.73** The increase in demand for 5G has grown both locally and nationally with the operators customers becoming accustomed to being able to access the 5G network wherever they go. The appellant's radio engineer prepared coverage plots (see Appendix CTL 2) to display the

extent of need for an installation at this location, accompanied by an illustrated site search area to demonstrate that the sequential approach has been followed, in accordance with the NPPF and Code of Practice. The search area also demonstrates the constrained area, typical to 5G cell site deployment in urban areas, identified to provide improved coverage and capacity and new 5G coverage reflected in the coverage maps.

- 3.74** The operators are fairly limited in siting options as there is a requirement to provide the latest 4G coverage to the cell area and new 5G service provision to an area which currently receives no 5G coverage.
- 3.75** The LPA in both of their reason for refusals have stated similar reasons for refusal and conclude *“In the absence of a comprehensive assessment of alternative sites for the proposed development it is not possible to definitively conclude that there are no more suitable sites reasonably available that would result in a lesser degree of visual harm”*. The operators have considered all siting options and determined this location was the most appropriate from a technical and planning perspective, especially given the target coverage area is a conservation area, and the site is situated outside of it. Furthermore, this is an appeal for 3 different operators who each have existing sites and frequency bandwidth, each has their own technical requirements that dictate the search area. All other options have been re-investigated, concluding this is the best option from a planning and technical perspective.
- 3.76** In an appeal on Fulwood Road in Sheffield for a 17.5m replacement column in relation to the operator needing to find a replacement site in order to replicate and improve existing coverage following the loss of an existing site nearby for redevelopment reasons, the inspector allowed the appeal even though he found less than significant harm to the conservation area it was located within (PINs reference: APP/J4423/W/20/3252355, see Appendix CTL 7 for a copy of the Decision notice and plans) as he considered that the benefits of the proposed scheme would outweigh the harm. He also found that new sites need to provide replica or improved coverage to that of the existing:

Para 19 ‘It is reasonable that any new site needs to provide replica or improved coverage to that of the existing, and that this provides for social and economic benefits to enable customers to continue to have access to the existing levels of coverage and capacity. I also accept that from a technical standpoint the appellant has sought to minimise the impact of the installation by virtue of its simplicity of its overall design and height.

Para 20 The accumulation of the above points leads to the conclusion of the provision

of the installation in this location provides a significant public benefit to the wider area and community, and to which I attach substantial weight in support of the development.

Para 21 In the absence of any alternative options, I conclude that the benefits resulting from the proposed development would outweigh the less than substantial harm to the significance of the conservation area as a heritage asset and any conflict with Section 72 of The Act’.

- 3.77** It is noted that the above appeal was located in a conservation area and therefore in a more heritage sensitive location than the appeal site, which is not in a heritage designated area, instead sited outside of the conservation area that it is targeting. Furthermore, the inspector found there to be less than substantial harm to the conservation area and carried out the planning balancing exercise weighing the harm to the conservation area compared to the benefits of being able to provide replica and improved service provision to the surrounding area. These are strong transferrable points that can be used in this appeal as an indication of the strength of support from Government of the social and economic benefits of providing the latest technologies to areas which have a current hole in service provision and the need to provide replacement replica and improved coverage to the cell area to prevent the appellant’s customers from experiencing dropped calls and buffering as demands on the network continue to grow. Thus, the operator is obliged to upgrade its network to ensure that its customers continue to be able to access the network in the way that they have come to expect and that their latest 5G enabled handsets will be able to work for the purposes in which they were purchased.
- 3.78** The appellant notes that the planning officer has failed to understand the reason why the search area is small, limiting the number of the discounted options for the appeal site *“it is considered that the submitted search area is highly constrained and does not demonstrate the full extent of available sites within the locality”* (see Appendix CTL 8 for the delegated report).
- 3.79** In a recent appeal decision Footway of St Mildreds Road in Lewisham for a 17.5m monopole in relation to the operator needing to find a site to improve existing coverage and provide new 5G coverage. The inspector allowed the appeal even though he found the mast would have some harm to the character and appearance of the area, the outlook from nearby dwellings and other alternatives may have had less visual harm. However, the planning inspector recognised operational requirements are just as important. (PINs reference: APP/C5690/W/23/3334595, see Appendix CTL 9 for a copy of the Decision notice and plans) The inspector acknowledged whilst alternatives would be better from a visual impact if they

don't work operationally then they are of no use:

'Para 13 The appellant has provided clear and detailed reasons why each of the alternative identified sites were discounted. The Council has not sought to challenge these reasons as such or suggest alternative sites. Instead, it contends that the assessment largely discounted each of these sites due to operational requirements, rather than considering their impact on public or neighbouring amenity. However, the Council's approach on this matter is flawed. Whilst there may be sites which are better sited in respect of character and appearance as well as amenity considerations, there is little point in assessing those sites if they do not meet operational requirements to support high quality communications. On the basis of the evidence before me, the appellant's site selection process is robust and the Council has provided no substantive evidence to demonstrate otherwise.'

Site Selection – Discounted Sites

3.80 In accordance with the licence obligations and advice in NPPF and the Code of Practice the applicant's network rollout team undertook an inspection of the area of search, which investigated the following siting and design options using this sequential approach to site selection:

- Upgrading their own existing base stations;
- Using existing telecommunications structures belonging to another communications operator. i.e. Mast and/ or site sharing, co-location;
- Installations on existing high buildings or structures including National Grid pylons;
- Using small scale equipment; and finally
- Erecting a new ground-based mast site – (1st) Camouflaging or disguising equipment. (2nd) A conventional installation e.g. a lattice mast and compound.

3.81 The appellant's site selection strategy is to keep the overall environmental impact to a minimum. Utilising existing masts is always progressed where it is technically and legally possible and where it is the local planning authority's preferred environmental solution.

3.82 In this instance it was decided that the operators would continue to share one mast in this area to avoid proliferation. Streetwork style poles are no longer able to support the heavy weight of the operators' kit. The 5G antennas are much bigger and heavier than the previous generations

of mobile technologies as they carry much more data. Thus, there is not sufficient space at the top of the existing column to support the new antennas which are required. The feeder cables which run down the centre of the column are also much heavier and bigger to support the new 5G antennas and the existing column is not wide enough to accommodate these feeder cables. In order to reduce proliferation in this location, the operators are continuing to share one mast via the lattice tower due to its structural strength and antenna orientation abilities (explained later in this statement of case).

- 3.83** A number of sites have been considered prior to the appeal site being selected. These were given careful consideration with regard to the impact of development at each location in terms of visual and residential amenity, other planning issues as well as the technical suitability of each site to VMO2 and VodafoneThree. In selecting the site and design of the proposed installation the views that have been received as a result of the consultation exercise have been taken into account. The location considered most acceptable in terms of all these factors was then selected.
- 3.84** The details of alternative sites considered prior to selecting the proposed site and design are contained in the list below. A search area map and discounted options can be seen at figure 5 below, this should be viewed in conjunction with the list of discounted options.



Figure 5: Designated Search area and discounted sites.

3.85 D1 – Rooftop - Rochdale RUFC, Broadhalgh Avenue, Broadhalgh, Norden, Rochdale, Greater Manchester, OL11 5LZ NGR E: 387244 N: 413388

The building is too low to host a sensitively designed base station, when taking into account its roof shape, overall height, as well as its surrounding context. A rooftop proposal of significant height, weight and massing would be required to meet the operator's technical requirements, in which it is considered that should any such proposal come forward here it will be out of keeping with the host building. This is the main reason for discounting this site. However, there are other reasons for discounting this site. It is also not structurally stable enough to support the heavy weight of the operators antennas. The design of the building would also not lend itself to supporting telecommunications apparatus. The roof is pitched and thus there is nothing for the apparatus to be securely attached to. Each antenna weighs circa 50kg each and the ERS's weigh circa 25kg each, along with the heavy feeder cables. The antennas would also not be able to be directed to the target coverage area from a pitched roof as they would be pointing up to the sky rather than horizontally. This site has therefore been discounted for these reasons.

3.86 D2 – Greenfield - Rochdale RUFC, Broadhalgh Avenue, Broadhalgh, Norden, Rochdale, Greater Manchester, OL11 5LZ NGR: E: 387098 N: 413320

There are access constraints for a site proposed here. There is a requirement for stable ground to build and maintain a site, which is why access tracks are often formed to accommodate

masts or use of public highways to transport the mast for build, upgrade works or maintenance. A new access track would be required for the build and maintenance of the site to accommodate for the heavy vehicles that are used to build the sites. This would be unacceptable to pass through the rugby playing fields, especially when considering the proposed appeal benefits from using existing access entrances and tracks. A site in this location would also be on slightly elevated land, meaning it would be more visible in the wider surrounding area than the chosen site which sits on the lower elevation of the grounds adjacent to screening provided by adjacent trees, reducing its overall long range visibility. Therefore, this site has been discounted for this reason.

3.87 D3 – Greenfield - Rochdale RUFC, Broadhalgh Avenue, Broadhalgh, Norden, Rochdale, Greater Manchester, OL11 5LZ NGR: E: 387245 N: 413345

A site in this location would cause access issues for the Rugby club deliveries as the site needs to be contained within a secure compound up to 10 x 10 due to them being climbable structures. The structure would restrict views for spectators on the rugby pitch and would not be acceptable. Therefore, there is insufficient space to accommodate access and a mast in this location. In comparison, the proposed appeal location benefits from being away from the spectators visibility of the pitch and can be accommodated safely away from any access and operational requirements for the rugby club. A site in this location has therefore been discounted.

3.88 D4 - Streetworks - Clubhouse Close, Broadhalgh, Norden, Rochdale, Greater Manchester, OL11 5LT NGR: Various

There is insufficient space available on this stretch of pavement. The siting and dimensions of a streetworks style mast and its associated equipment cabinets, would restrict pedestrian movements to unacceptable levels and may result in them stepping into the carriageway. This is in accordance with Inclusive Mobility (2021), which requires footways to remain wide enough to allow safe passage for pedestrians including those using wheelchairs and pushchairs.

A site in this location would be much closer to the nearby conservation area and be more visible from within it, this would have a greater impact on its setting. It would also be directly outside residential frontages which would have a greater impact on visual amenity. Compared to the proposed site that is situated well away from the conservation area, it will result in no harm due to the separation distance and intervening development. It is also sited well away from residential frontages, with a clear separation distance and other vertical modern structures in the nearby vicinity. Therefore, a site in this location has been discounted for these

reasons.

3.89 D5 – Greenfield - Clubhouse Close, Broadhalgh, Norden, Rochdale, Greater Manchester, OL11 5LT NGR E: 387353 N: 413313

An installation in this location would be directly adjacent to 7 Clubhouse Close which would have a greater impact on visual amenity than the proposed upgrade. The gable end of 7 Clubhouse close has windows that would face the site with no screening, this would have an overbearing impact, contrary to Policy DM1 of the Rochdale Core Strategy. In this respect a scheme's siting and appearance, including its overall height must cater for those persons that might be present at height, as they must not be able to encroach upon the ICNIRP exclusion zones around each antenna. In this respect an option here was discounted for technical reasons, as ICNIRP exclusion zone compliance would be compromised given the close proximity of the building alongside. In comparison, the nearest residential window for the proposed upgrade is circa 30m away with intervening trees and ball stop netting. A site here would be more prominent and have a greater impact on visual amenity for the occupants of nearby properties as they would have views of the installation at a much closer range than at the appeal site. Therefore, a site in this location has been discounted.



3.90 D6 – Greenfield - Rochdale RUFC, Broadhalgh Avenue, Broadhalgh, Norden, Rochdale, Greater Manchester, OL11 5LZ NGR Various

There is no space in this location, it is currently being utilised for the Rugby Club's welfare units and first aid. The car park is utilised by both players and fans on matchdays, a 10 x 10m compound is required, taking up at least two car parking spaces. There are also underground services and sewer pipes in the car park as can be seen with the manhole covers which means it is not possible to build a site in parts of the car park, eliminating much of the car park. If a site was to be located near to the building, in order to achieve ICNIRP compliance, a taller mast would be required to reach over the rugby club. In this respect a scheme's siting and appearance, including its overall height must cater for those persons that might be present at height, as they must not be able to encroach upon the ICNIRP exclusion zones around each antenna. In this respect an option here was discounted for technical reasons, as ICNIRP exclusion zone compliance would be compromised given there are balconies that are publicly accessible. The proposed appeal site location benefits from not being used by the Rugby Club, is away from any underground services so can be safely built and will not impact on ICNIRP safety due to its exclusion away from any buildings / balconies.

3.91 D7 – Residential property rooftops along Broadhalgh Avenue, Broadhalgh, Norden, Rochdale, Greater Manchester, England, OL11 5LZ, NGR Various

The majority of these low level roofs are pitched and thus there is nothing for the apparatus to be securely attached to. Each antenna weighs circa 50kg and the RRU's weigh circa 25kg each, along with the heavy feeder cables the rooftops would not be structurally stable enough, especially when considering this is for three operators.

Bolts would need to be attached through the building to backplates on the other side into the residential dwellings ceilings. These bolts and backplates would need to be inspected internally on an annual basis. This would be very intrusive for the occupants of these properties and would not be practicable. These buildings have therefore been discounted for these reasons.

3.92 D8 – Greenfield – Rochdale RUFC, Broadhalgh Avenue, Broadhalgh, Norden, Rochdale, Greater Manchester, OL11 5LZ, NGR: E: 387220 N: 413356

There is no space in this location, a 10 x 10m compound is required to secure the mast which would encroach onto the rugby playing field, impacting player safety. There is little to no screening here, it will be highly visible compared to the chosen site. It is considered to have a greater impact on visual amenity compared to the appeal site which benefits from being tucked away and situated against semi-mature trees. Furthermore, the embankment to the east would

also cause structural stability issues. The operator requires flat land all around their compound to ensure land does not slide/ fall away and impact the structural stability of the mast and equipment cabinets. Therefore a site in this location has been discounted.

3.93 D9 – Greenfield – Rochdale RUFC, Broadhalgh Avenue, Broadhalgh, Norden, Rochdale, Greater Manchester, OL11 5LZ, NGR: E: 387166 N: 413252

There is access constraints for a site proposed here. A new access track would be required for the building and maintenance of the site which would be unacceptable to pass through the rugby playing fields.

An installation in this location would also be directly behind 82 Broadhalgh Avenue which would have a greater impact on visual and residential amenity than the proposed appeal site. The nearest window for the proposed upgrade is circa 30m away with intervening trees, a site in this location would be 20m away from the nearest house without intervening trees. Therefore, this site has been discounted for this reason.

3.94 D10 – Greenfield – Rochdale RUFC, Broadhalgh Avenue, Broadhalgh, Norden, Rochdale, Greater Manchester, OL11 5LZ, NGR: E 387166 N 413252

There is insufficient space in this location to locate a mast, it would encroach and block part of the road way leading to safety issues. A 10 x 10m compound is required to accommodate the mast and provide a secure compound, there is not enough space in this location to locate all the equipment here. The mast would also be closer to the properties along Broadhalgh Avenue with no screening. There would be an overbearing impact on 70 Broadhalgh Avenue due to the lack of screening and proximity, this would be unacceptable and contrary to policy DM1 of the Rochdale Core Strategy. In comparison, the proposed appeal location would be located circa 30m away from 70 Broadhalgh Avenue, with intervening trees to screen elements of the mast. Therefore, this site has been discounted.

3.95 D11 – Streetworks – Footway of Broadhalgh Avenue, Broadhalgh, Norden, Rochdale, Greater Manchester, OL11 5LZ, NGR: Various

A site located along this road would be surrounded by residential properties, with their frontages facing the proposed radio base station at close range. This would have a much greater impact on visual amenity than the proposed appeal location. It would also be located within Moorgate Conservation Area, so would have a greater degree of harm compared to the appeal site. The chosen appeal site benefits from being outside of the conservation area and the conservation officer has confirmed it would not impact on the conservation area due its

separation distance, resulting in no degree of harm to the relationship between the mast and conservation area. An installation at this location is not possible due to insufficient space to install both the required equipment and allow safe passage for pedestrians including those using wheelchairs and pushchairs, in line with Inclusive Mobility (2021). This site has therefore been discounted for these reasons.

3.96 D12 – Greenfield – Land to the west of Rochdale RUFC, Broadhalgh, Norden, Rochdale, Greater Manchester, OL11 5LZ, NGR: Various

The case officer has stated within their delegated report has suggested *“aerial imagery shows parcels of open land to the west, which would have a greater distance from residential properties than the identified sites that have been explored in this planning application. Without prejudice to the outcome of a future planning application, the land to the west would likely be a more suitable site within the locality, with access along Regency Crescent and maintaining a significant distance away from key views and residential properties”*.

Whilst a site may appear better visually from a planning perspective, if it does not work technically, then it isn't an option. This was re-emphasised by an inspector in 2024 (see Appendix CTL 9 for a copy of the appeal decision).

The alternative areas of land which were proposed by the planning officer are between 150m – 400m away from the existing site which the operator requires to find a replacement for. It was explained throughout the site specific supplementary document (SSSI) the constraints the operator faces when looking for a replacement site, including the search area. These constraints are exacerbated when considering this is an installation for 3 different operators. Each has their own frequency spectrum and existing coverage they need to find a replacement around. Anything that overlaps into their existing coverage would not work, similarly anything too far away from the existing site would not reach their target coverage area due to the differing frequency levels. A site outside the designated search area simply would not work, it would leave coverage deficiencies in the target area and an additional site would be required to infill this hole in coverage. Figure 6 below shows the distance between the location of the existing site and planning authority's suggested location.

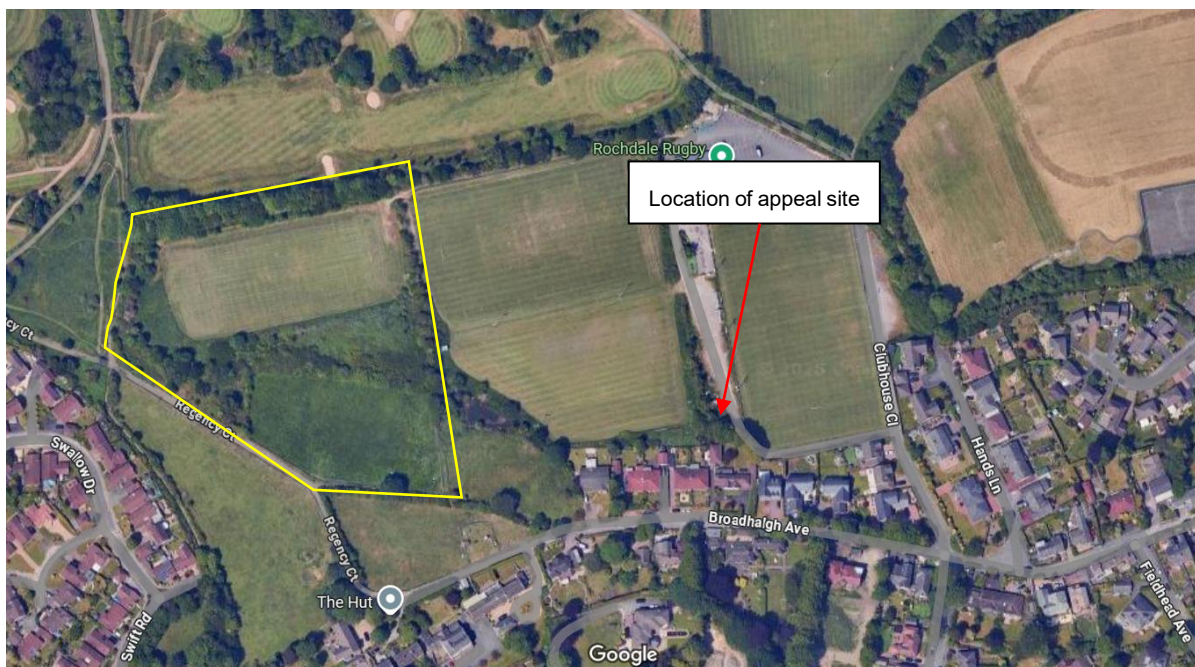


Figure 6: Planning authorities suggestion compared to the location of the appeal site

3.97 D13 – Existing Telecoms masts – Rochdale RUFC, Broadhalgh Avenue, Broadhalgh, Norden, Rochdale, Greater Manchester, NGR: Various

The operator has fully investigated upgrading the existing radio base stations currently in situ to provide the latest technologies for 4G services as well as new 5G coverage/capacity into the VMO2 / VodafoneThree network. However, the design of all of the existing poles (one for ThreeUK; one for EE and one for VMO2 and VodafoneThree) are not able to support the new 5G antennas, which are bigger and heavier than previous generations of mobile technologies as they carry much more data. Thus, there is not sufficient space at the top of any of the existing column to support the new antennas which are required. The feeder cables which run down the centre of the column are also much heavier and bigger to support the new 5G antennas and the existing column is not wide enough to accommodate these feeder cables.

To continue to share any of the existing masts at this location would require significant redevelopment of the existing structure to a much more structurally robust mast capable of hosting all the equipment from three operators such as the design proposed in this appeal. There is also a lack of space to install such a structure within this location given the footprint it would take up. The bulkier mast and secure compound would encroach onto the access road, along with being situated directly against the rugby pitch which would clearly not be acceptable. It would also be much more visible than the chosen appeal site due to the lack of screening, it would appear more prominent compared to a site that is tucked away from the playing pitch

and situated against mature trees. These three existing telecommunications sites along the rugby pitch have been discounted for VMO2 and VodafoneThree new technology requirements for this reason. Therefore, a new replacement site for VMO2 and VodafoneThree is needed to provide this operator with the latest 4G and 5G technologies, but given it is part of an established and mature network a new base station is needed with close proximity.

Once the lattice tower is operational, the existing radio base station for VMO2 and VodafoneThree (see image 1) will be removed and land restored back to its original condition, in line with planning and license requirements.

- 3.98** A map of the discounted sites can be found in figure 5 above. The search area is highlighted by the yellow polygon. This site is the only suitable option within the operators search area which would provide the necessary coverage to the target coverage area. As can be seen from the search area there are few breaks in the residential nature of the area for a radio base station to be installed.
- 3.99** The appeal site is the most suitable option within the operators limited search area in the immediate surrounding environment which would provide the necessary coverage to the target coverage area. It is not constrained by being too close to buildings impacting ICNIRP compliance and / or visual amenity, it is not constrained by underground services and can be built via an existing access route. It is set against the backdrop of trees, tucked away in the sports ground with a clear separation distance between the proposal and residential properties. There are no other suitable non-residential buildings or greenfield sites which could support the appellant's multi technology equipment on the one installation. A map of the search area together with the location of the discounted options can be found below:

4.0 THE APPEAL PROPOSALS

4.1 Full planning application ref: 25/00155/FUL, which is the subject of this appeal, was uploaded to the Planning Portal on 06th February 2025 and sent to the local planning authority via the Planning Portal on 18th February 2025 once payment had cleared. It was an application submitted under Part 16 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) and is in accordance with the Electronic Communications Code (as amended). Where development exceeds the limits set out in the GPDO or relates to areas where permitted development rights do not apply, then operators are subject to the usual requirement for full planning permission.

4.2 The application was registered on 14th March 2025 and the following description was given:

'Removal of existing 15m monopole supporting 3 no. antennas, 4 no. equipment cabinets, 1 no. electric meter cabinets and timber fence, installation of a new 12m pole with flood lights, 20m lattice tower supporting 6 no. antennas, 2 no. transmission dishes, 4 no. replacement equipment cabinets, 1 no. replacement electric meter cabinet, 2.0m palisade fence and ancillary development there to including Ericson Radio Systems (ERSs) and 1 no. GPS module'.

4.3 The operator has carefully considered the design of the proposed mast. The structure has to be able to support the equipment for 3 operators. A lattice tower is the most suitable design from a technical viewpoint. Such a design is also able to facilitate greater coverage (as they give better scope for antenna orientation) and provide the structural capability required to be able to support the weight and size of both the operators telecommunications equipment. Due to the slim line nature of the supporting struts of the lattice frame, light is able to continue to pass through the structure. If the lattice tower were to be any slimmer in width, then it would not be structurally capable of supporting all the operators equipment or meet the windloading requirements. The colour of the tower is proposed to be galvanised to help it blend in with the often grey sky. However, it can be coloured any other colour that the inspector considers appropriate.

4.4 The proposed tower will support the multi-technologies 2G-5G for three main operators Virgin Media O2 (VMO2) and VodafoneThree (Vodafone and Three). There are no more sensitive design available for these three operators to provide all their high quality, advanced multi technologies on the one installation. To reduce the bulk at the top of the mast the number of antennas have been reduced and the bulky headframe has been removed (See Appendix CTL 6 for a copy of the previously refused plans). The antennas are located on the legs of the tower

and are positioned as tightly as possible. There are 6 antennas in total, 3 for VMO2 and 3 for VodafoneThree. They need to be in this array to ensure there is sufficient horizontal antenna separation between the two sets of antennas to prevent them from detrimentally affecting each other's operations.

- 4.5** The proposed height at 20m is essential in order to provide sufficient coverage and capacity to the target coverage area. A reduction in height would reduce the coverage footprint of the proposed installation and radio have confirmed that this compromise on height would not be able to provide complete and meaningful service provision to this cell area. 5G new radio technologies operate in higher frequency bands than older technologies. Since it operates at higher frequencies where attenuation of the radio signal is naturally higher and the effects of clutter are greater it will normally require a higher structure to achieve the same coverage footprint. To increase capacity and data speeds to the user, the 5G antennas need to be mounted higher than previous technology's antennas. These factors drive a requirement for an increase in antenna height in 5G.
- 4.6** If the mast height were to be reduced any further, then it would not clear the trees, buildings and urban clutter in the area and as such would not work effectively, as demonstrated by the panoramic images (see figure 7 below). The PANs evidence a lower height (18.5m structure with the base of antennas at 16.5m AGL) in this location would result in the antennas being blocked by the clutter and vegetation. The bearings show at 120-150 degrees the trees would block one sector, the lower height would lead to a poor user experience for a large part of the target coverage area, which already lacks any 5G coverage. As such, this would fail the operators design brief and an additional installation would have to be found leading to the proliferation of masts contrary to national planning guidance contained in the NPPF.

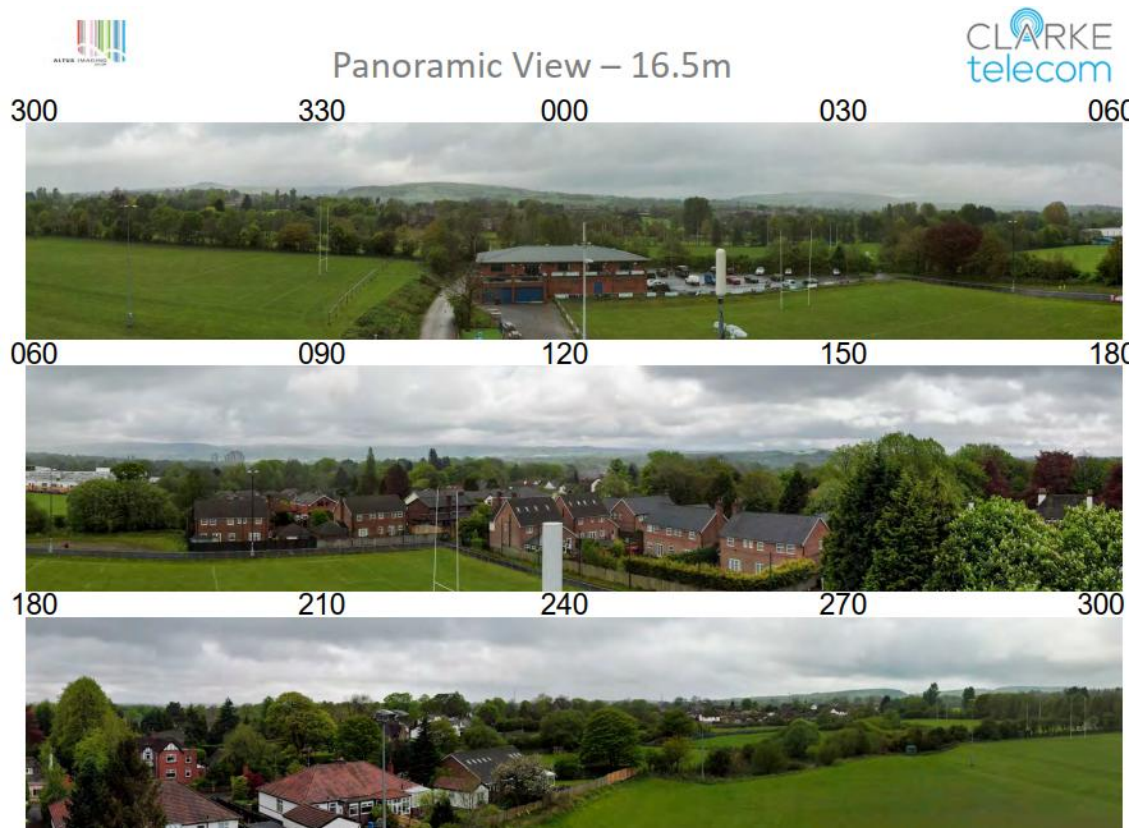


Figure 7: Panoramic view of site at 16.5m

- 4.7** It is essential that the 5G antennas are unshrouded. As the radio frequencies get higher, required for data carrying, the antennas are less able to propagate through immediate blockages including Glass Reinforced Plastic, which is what the shroud is made from. This affects the 5G antennas more so than any other technology. The result being they cannot operate effectively when close to Glass Reinforced Plastic or any other blocking material. Therefore, there is a technical reason why the 5G antennas need to be unshrouded. If these antennas were to be shielded, then they would not be able to provide the necessary coverage to the target coverage area. An additional installation would be needed elsewhere within the cell area, leading to the proliferation of masts.
- 4.8** The latest 4G technology are also affected more so than older technologies by propagation and are therefore less efficient if they are shrouded. As such, the other antennas also need to be unshrouded to ensure that the latest technologies are provided to the surrounding area, helping the Greater Manchester City region become the smartest city and one of the best digitally connected city-regions in the UK as advocated in the Greater Manchester Local Industrial Strategy (see later for further details).
- 4.9** This is the slimmest design possible which will enable all technologies for three operators to

be supported from this site. The lattice style mast is necessary to accommodate the weight of all the required equipment. Reducing the diameter and strength of the mast would not support the required equipment on a single structure and another radio base station would be required, which would lead to the proliferation of masts contrary to national Government guidance set out in the NPPF and the Code of Practice.

- 4.10** These traditional greenfield site designs are preferred by operators as they are structurally capable of hosting more equipment and give greater scope for antenna orientation and are thus more efficient structures. Streetworks style poles cannot support the equipment for three operators equipment and therefore a lattice tower is seen as the most appropriate solution from a structural, along with a planning perspective.
- 4.11** Whilst the appellant appreciates that the Local Planning Authority raised concerns about the proposal on the previous application submission, the type of structure cannot be changed, nor can the height of the proposed tower be reduced. Given the nearby trees in the area, lack of physical access arrangements and if the site were to be moved further north it would not reach the full target area of the residential nature to the south. The site is as sensitively located as possible whilst also meeting technical and operational constraints.
- 4.12** The Code of Practice (March 2022) provides guidance on how to reduce the impact of new ground based masts such as by siting near similar structures, screening and using simple designs and appropriate colouring. The Code notes that these principles help reduce the impact of the new infrastructure in certain locations. It also states that placing a mast within or adjacent to an existing group of trees, vegetation and other natural features can minimise visual impact.
- 4.13** The appeal proposals fully accord with the Code of Practice for Wireless Network Development in England (March 2022). The radio base station has been sited against a band of trees and shrubbery which will limit the impact of the proposal in the surrounding landscape. The colour of the mast and cabinets will be galvanized which will blend in with the often grey sky.
- 4.14** The Code of Practice goes on to advise that operators should see to share sites where possible as site sharing reduces the number of sites required and network proliferation. The proposed installation will enable 3 of the 4 UK telecommunications operators to utilise the same structure thereby serving approximately 75% of the population.
- 4.15** The transmission dishes are essential to link the installation back into the MNO's wider network and relay the data. The dish antennas used by mobile phone networks are relatively small, in this case they are all proposed to be 600mm in diameter. They are used to link individual radio

base stations to each other and, through a series of links, into the wider mobile phone and fixed line networks. In order to communicate with each other, dish antennas must have a clear line of sight, sometimes known as point-to-point communications. They must be in clear view of each other without any physical obstructions such as trees or buildings which would reduce or disrupt the low-powered signal. For this reason, dish antennas are always mounted high on rooftops or tall structures. In this instance, in order to obtain a clear line of sight the minimum centre line height needs to be 16.60m above ground level.

- 4.16** The cabinets are small for telecommunications equipment. The VMO2 equipment cabinet (which will also be utilised by VodafoneThree) will have the maximum dimensions 2.100mm (w) x 725mm (d) x 850mm (h) which equates to 1.296m³. As a result, each cabinet will be less than 2.5m³ and therefore can be installed under the operators permitted development rights once the mast is installed. However, they have been included on the plans and in the description in order to remain fully transparent. Their colour is proposed to be Light Grey RAL 7035 to blend in with its surroundings. Given there are already other equipment cabinets in the area and they are situated within a secure compound, these cabinets will not be overly prominent in the landscape.
- 4.17** VMO2 and VodafoneThree are operators of an electronic communications network. It complies with the Electronic Communications Code as enacted under the Communications Act 2003, which provides the necessary legislative basis to run an electronic communications network. The proposed installation is needed to provide new high quality 5G service provision and in line with their license agreement and aligned to the latest Government thinking for the UK to be a world leader in 5G as well as the Greater Manchester Local Industrial Strategy, Greater Manchester Digital Blueprint, Greater Manchester Digital Strategy and Places for Everyone Joint Development Plan which fully supports 5G technology, seeking to ensure that Greater Manchester is a world-leading digital city, one of the best places in the world for developing and harnessing digital technology and to be recognised as being a top 5 European Digital City Region.
- 4.18** The replacement site subject of this appeal will fill in the significant 'gap' in 5G coverage for the residential area to the south in Bagslate Moor. Currently, superfast 5G technology is non-existent for VMO2 or VodafoneThree in this area. 5G requires a contiguous network of coverage to ensure maximal service provision. Gaps in such coverage would adversely affect the impact of the performance of the latest technology throughout the cell area leading to a poor user experience. This proposed installation will meet the appellant's customers' demands for a better service in this area of Bagslate Moor and the operator's legal requirement to provide

high quality 5G coverage under its 5G license obligations. It will provide 75% of all local network users the ability to access the 5G network from one installation. It will deliver improvements required for the local network now, and also facilitate further improvement for multiple operators going forward as the demand on networks continues grow.

4.19 The full planning application was determined by planning officers by virtue of the Authority's Scheme of Delegation on 09th May 2025.

4.20 The Officer's Delegated Report in its analysis section (see Appendix CTL 8) acknowledges there is previous planning history with the proposal for the operator, noting there was a previous refusal in 2022 for a similar structure but with a large open headframe, supporting a higher number of antennas (see Appendix CTL 6 for a copy of the decision notice and plans).

4.21 The delegated Officer's Report begins by analysing the principle of development, referring to the NPPF, Rochdale Core Strategy and PfE Joint Development Plan, all of which contain policies relating to telecommunications. Upon their findings within the relevant policies, they conclude that a new telecommunications mast is acceptable in line with the aforementioned policies:

'In principle, the erection of a new telecommunications mast is acceptable, with clear reference to policies E1 of the Rochdale Core Strategy and Policy JP-C2 of the Places for Everyone Joint Development Plan, and the above paragraphs of the NPPF, subject to assessment of development management considerations as discussed in turn below'.

4.22 Following on from this, the case officer looks into the heritage impact. The site sits south of Moorgate Conservation Area and 15 Broadhalgh Avenue, a locally listed building. The case officer notes there is separation distance and screening if the site between these designated and non-designated heritage assets:

'Whilst it is noted that both these designated and non-designated assets are in the general vicinity of the application site, the application site is screened from them by No. 72-74 Broadhalgh Avenue. In addition, the site is set back within the Rochdale Rugby Union Club. These properties provide a buffer to the setting of the Heritage assets, and while it is acknowledged that at 20m tall, the proposed lattice tower would be markedly taller than any other manmade structures within close proximity to the site. The vertical projection, combined with the associated proposed equipment would increase the visual bulk in comparison to the existing telecommunications'.

- 4.23** The delegated report confirms the Conservation Officer was consulted and no comments were received at the time of making the decision. As the site has not moved, nor had the overall height of the mast reduced but the bulk of the headframe had, the case officer transferred the comments from the previous decision over to this appeal application. The conservation officer concluded the application was compliant with Policy P2 of the Rochdale Core Strategy and relevant policies of the NPPF:

“The Conservation Officer was consulted as part of the proposals however no response was received. It is noted the recently refused application 22/01192/FUL is very similar in height, siting and design, (albeit this application reduces the bulk of the antennae). As such, the Conservation Officer’s previous view that the considered harm the proposal would have upon heritage assets as neutral, is carried over onto this application. As such, the proposal is not considered to have any unacceptable impact upon adjacent heritage assets, and is compliant with Policy P2 of the Rochdale CS, and the relevant policies contained within the NPPF”.

- 4.24** The delegated report then goes onto assess the sites siting and appearance. They reference Paragraph 139 of the NPPF which refers to design of development but was not referred to within their policy analysis section:

‘Para 139. states “Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes’.

- 4.25** Despite the equipment cabinets being individually marked and measured, the case officer calculates them all together and concludes this would be a lot bigger than what is existing:

“The proposed equipment cabinets would measure an area of 29sqm, which would be dramatically larger than the space required for the monopoles as existing”.

- 4.26** The case officer in the delegated report explains the area is currently uncluttered, with an open character. There are existing monopoles in the area including poles hosting VMO2 and Vodafone which are all similar in height. The officers opinion is they are all in keeping with the area:

“Visually, the area is uncluttered and has an open character and appearance with limited street furniture. The site appears on the edge of the residential area and the properties along Broadhalgh Avenue present a clear divide from the open space of

the rugby club. The existing monopoles appear uniform in height and their siting and the setting of them at a rugby club is not out of keeping with the overall character of the area”.

- 4.27** Following on from their assessment, the case officer compares the lattice tower with the existing monopole, street furniture and equipment, despite in the paragraph above describing the area as uncluttered, confirming they’re in the opinion of the lattice tower would be out of character for the area:

“The proposed lattice tower would be substantially taller and bulkier than the existing monopoles, street furniture and equipment. Due to both its height and bulk, it would form a visually dominant feature and one which would be out of character within its surroundings of the residential area”.

- 4.28** The siting of tower being near residential properties has a separation distance but the case officer’s opinion is it is the closest possible location across the whole of the area. It is recognised there are mature trees relatively close to the proposed mast but it will not assist with screening of the mast from the residential properties to the south along Broadhalgh Avenue:

“The proposed location means the lattice tower would be clearly visible from the rear of properties on Broadhalgh Avenue and properties located on Hands Lane, and located in the southern corner of the rugby club, it is the closest possible siting to the properties across the whole of the rugby club. It is noted the location of the mature trees relative to the proposed mast site; however this would not aid screening for the properties closest to the mast, and no tree protection order protects these trees from future removal”.

- 4.29** The delegated officer’s report continues stating there is no screening in the area or any large building in the vicinity:

‘The existing ball stop fencing would not provide adequate screening and the site would be wholly visible, with the dominance of the mast further emphasised by the lack of large/tall buildings adjacent and the open and flat character of the adjacent land’.

- 4.30** The delegated report moves onto the masts appearance, comparing it to other structures that would be viewed in tandem:

'In addition, there is no screening that would soften the appearance of the lattice tower from approaching the club along Clubhouse Close. The proposal would also project above trees along the close and be clearly visible, this dominance would be further emphasised by the tall structures adjacent to the tower, in tandem with the bulky appearance of the lattice tower style and associated antennae and cabinetry'.

- 4.31** The case officer continues explaining the technical considerations have been justified but they do not agree with the style of the mast in the area and suggest it should be moved away from the residential properties:

"Detailed in the supporting statement is the justification that the lattice tower is the most suitable design to support the proposed structures from a technical standpoint, and should this be slimmer, the operating requirements would not be met. While this may be the case, the lattice tower is not considered an appropriate design in a residential environment such as the proposed site. With regard to the rural location of the surrounding area, the site would be better suited on a parcel of land, well away from key views and a significant distance from residential properties"

- 4.32** In respect to the masts height, the report considers its height would be much taller than other surrounding man-made features and it would be much wider than these too:

"The proposed height would be substantially taller than any surrounding features, being taller than the tallest adjacent monopole, flood lighting column, street lighting column, and also have a much wider diameter and the lattice style would in appearance detract from the openness of the spacious grounds and would result in a cluttered appearance at odds with the existing character. It is acknowledged the height cannot be reduced for operational reasons, however this does not consequently mean this specific site is therefore suitable for a 20m high structure".

- 4.33** The Delegated Report confirms no changes to the proposal would change the planning authorities stance on the installation:

'Regardless of any potential changes in colour or materiality, the proposed lattice tower would still result in the introduction of a dominant and visually obtrusive feature in the street scene'.

- 4.34** The paragraph continues stating the lattice tower would be inappropriate and disproportionate to the area due to its proximity to the residential proposal:

"The proposal would therefore appear at significant odds to the prevalent scale and

character of the residential area and rugby club, of which the impact is emphasised by its inappropriate siting close to residential properties and views when travelling along Clubhouse Close”.

- 4.35** In respect to the existing monopoles and the installation of the new flood light, the case officer is in the opinion the removal of the existing installations once the tower is in place would not alter their impact of clutter in the area:

“The removal of the existing monopole would not alleviate the impact of clutter within the area, as the proposal also includes the erection of a floodlighting column in its place, which would further demonstrate the excessive height of the proposed mast.

- 4.36** Concluding the siting and appearance section, the case officer considers the cumulative impact would be harmful to the area:

“Cumulatively, it is considered that due to the significant height, thickness and exposed equipment on the lattice tower mast and the large area required to house the number of equipment cabinets, the proposal would be visually incongruous, being much taller than existing street furniture and buildings within the immediate area, and would have a materially harmful impact on the visual amenity of the area”.

- 4.37** Moving on to the alternative sites section of the delegated report, the case officer provides a brief statement on the benefits of digital connectivity:

“The council is aware of the economic and social benefits of providing and enhancing electronic communications infrastructure and 'levelling up' digital connectivity. The technical requirements of the mobile telecommunications equipment are clearly explained and justified in the documents that were submitted in support of the application, this includes the need for the lattice tower to be of the height and design proposed, in the location it has been proposed and contains reference to eight other sites identified by the applicant”.

- 4.38** The paragraph continues with the case officer acknowledging there have been amendments to the design since the previous submission:

“It is accepted that existing sites are considered preferable to existing masts. It is also noted that the design proposes changes from the previously refused submission, with a slimmer antennae and subsequent reduced capacity of the mast”.

- 4.39** The case officer identifies there were alternative options identified but believe the reasoning

was limited:

'In the supporting statement, ten other site references were examined and discounted. The information submitted is limited to a brief explanation as to why each of the alternative sites are unsuitable'.

- 4.40** Despite a search area being provided, the case officer provides alternative options outside of the search area to the west:

'The search presented is extremely limited and only includes the rugby club, and does not consider sites further away from residential properties; specifically no inclusion of land to the west. While the proposed site is heavily constrained between Rochdale rugby club, Rochdale golf club, Oulder Hill Academy and the residential properties to the south, aerial imagery shows parcels of open land to the west, which would have a greater distance away from residential properties than the identified sites that have been explored in this planning application. Without prejudice to the outcome of a future planning application, the land to the west would likely be a more suitable site within the locality, with access along Regency Crescent and maintaining a significant distance away from key views and residential properties'.

- 4.41** Concluding this section, the case officer is in the opinion there are other alternatives that exist which would provide a lesser degree of harm:

"Therefore, from the submitted sequential assessment, it would not be possible to definitively conclude that there are no more suitable sites reasonably available that would result in a lesser degree of visual harm, harm to the amenity of nearby occupiers and harm to the significance of heritage assets. Taken as a whole, would fail to comply with the requirements of paragraphs 119 to 120 of the NPPF"

- 4.42** Moving onto the benefits and planning balance section, there is a brief confirmation the case officer acknowledges the requirement for enhanced mobile technology but they do not think this outweighs the harm to the area:

"The requirement for enhancing electronic communication infrastructure and 'levelling up' digital connectivity must be balanced against the requirement for equipment to be sympathetically designed and camouflaged where appropriate. Having regard to all relevant considerations, including national planning policy and the potential availability of alternative sites, it is not considered that the benefits of the installation in terms of the enhancement of the telecommunications network, including its

contribution to economic growth and the operational and locational needs of the operators outweigh the significant harm arising to the character and appearance of the area”

- 4.43** The delegated report concludes there would be some benefits but the visual amenity must be protected and other alternatives could exist that provide improved the required coverage, whilst protecting visual amenity:

‘The Council acknowledge that a balance must be struck between the importance of telecommunications infrastructure and the need to protect visual amenity. It is considered that in this particular case, the scale of the unacceptable impact that the proposed installation would have on the character and appearance of the surrounding area cannot be outweighed or justified in this case by the public benefits. It is considered that the submitted search area is highly constrained and does not demonstrate the full extent of available sites within the locality. On the basis of the submitted information there is insufficient evidence to be satisfied that the site represents the least harmful option available in the area to meet the additional coverage and capacity requirements and so secure the same public benefits’.

- 4.44** In their concluding remark, the case officer outlines the policies the installation goes against:

‘In conclusion, it is considered that the proposed installation would have a significant and detrimental visual impact and by virtue of this would fail to satisfy Policies P1, P3 and DM1 of the Rochdale CS, Policy JP-P1 and JP-C2 of the Places for Everyone JDP, and the NPPF’.

- 4.45** The full planning application was refused under delegated powers on 09th May 2025

5.0 NATIONAL PLANNING POLICY

Introduction

5.1.1 Planning policy is provided at the national level by the National Planning Policy Framework (NPPF). It is a material consideration in planning decisions.

5.1.2 It is not necessary to quote extensively from this document, but the following points are highlighted.

5.2 National Planning Policy Framework (December 2024)

5.2.1 The Government's National Planning Policy Framework (NPPF) was most recently revised in December 2024. The Government's latest thinking continues to strongly support communications infrastructure. The NPPF remains very supportive of high-quality communications. Indeed, a whole chapter is dedicated to high quality communications, emphasising the importance that the Government attaches to digital connectivity. Paragraph 118 states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. However, it also includes the importance of *reliable* communications infrastructure for both economic growth *and social well-being*.

5.2.2 Paragraph 119 notes that 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. The economic and social benefits of providing high quality and reliable communications infrastructure are well documented and can be found later in this Supporting Information Statement.

5.2.3 Paragraph 119 of NPPF makes reference to 5G:

'Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G)...'

5.2.4 With the above in mind, the Government is already forward thinking the evolution of data networks and seeks planning decisions to take account of this. 5G technology provides increased speed of data and more capacity in the network, to ensure that handheld devices can continue to be used for the purposes in which they were purchased. This will bring even greater economic and social benefits to the area.

5.2.5 Paragraph 120 of the NPPF retains the requirement to minimise the number of installations consistent with the efficient operation of the network but also includes being consistent with the

needs of consumers and providing reasonable capacity for future expansion.

5.2.6 Paragraph 121 of the NPPF relates to determining applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.

5.2.7 Paragraph 8 of the NPPF sets out three objectives for achieving sustainable development:

'an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.

a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and.

an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy'.

5.2.8 At the heart of the NPPF is the retained presumption in favour of sustainable development (para 11). For decision-taking this means approving development proposals that accord with an up-to-date development plan without delay or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless the application of policies within the revised Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed or any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the revised Framework taken as a whole.

5.2.9 The NPPF continues to provide guidance on decision-making. At paragraph 39 it states that:

'Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including...permission in principle, and work proactively with applicants to secure

developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible’.

5.2.10 The NPPF builds on the aspiration to build a strong, competitive economy. Paragraph 85 states:

‘Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking in to account both local business needs and wider opportunities for development. The approach taken, should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation.’

5.2.11 Continuing at Paragraph 86, the NPPF states planning policies should facilitate development to meet the needs of a modern economy, including digital infrastructure:

‘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’.

5.2.12 Section 16 of the NPPF refers to conserving and enhancing the historic environment. Paragraph 207 explains how local planning authorities and applicants should assess their proposals against the historic environment:

‘In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation’.

5.2.13 Paragraph 208 of the NPPF states Local Planning Authorities assess level of significance of any heritage asset that may be affected by a proposal:

‘Local planning authorities should identify and assess the particular significance of any

heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal'.

5.2.14 The NPPF goes on to provide guidance on considering the potential impacts of development on heritage assets. Paragraph 208 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

5.2.15 Paragraph 215 retains advice in the previous NPPF relating to the degree of harm. It states that 'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

Code of Practice Wireless Network Development in England (March 2022)

5.2.16 The Code of Practice provides guidance to Code Operators including the Mobile Network Operators and wireless infrastructure providers, their agents and contractors, local planning authorities, and all other relevant stakeholders in England on how to carry out their roles and responsibilities when installing wireless network infrastructure.

5.2.17 The aim of the Code of Practice is to support Government's objective of delivering high quality wireless infrastructure whilst balancing these needs with environmental considerations. Led by the Department for Digital, Culture, Media and Sport (DCMS), this Code of Practice has been developed in collaboration with representatives of the mobile network industry, other government departments and public bodies, local planning authorities, and protected landscapes. The Code of Practice covers all forms of wireless infrastructure development, including mobile masts and cabinets. This document replaces the previous Code of Best Practice on Mobile Network Development (2016).

5.2.18 Paragraphs 8 – 12 of the Code of Practice set out the importance of connectivity:

'8. 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.

9. 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.

10. The [Future Telecoms Infrastructure Review \(FTIR\)](#) and the [National Infrastructure Strategy](#) set out the government's long-term strategy for meeting its digital connectivity targets and delivering high quality, reliable digital infrastructure that works across the UK.

11. The government has committed to extending mobile coverage across the UK. The government's Levelling Up White Paper has set a mission that the UK will have nationwide 4G coverage, with 5G coverage for the majority of the population by 2030. In support of this, the government and the UK's mobile network operators agreed a [£1 billion Shared Rural Network deal](#) to extend 4G mobile geographical coverage to 95% of the UK by the end of the programme.

12. [Next Generation Mobile Technologies: A 5G Strategy for the UK](#), and the [update](#) to this, set out the government's ambition for the UK to be a global leader in 5G to take early advantage of its potential and help to create a world-leading digital economy that works for everyone. The government also wants businesses and communities to benefit from investments in 5G as soon as possible. Through the government's 5G Testbeds and Trials programme we have seen its value to manufacturing, farming, transport networks and healthcare'.

5.2.19 Paragraph 13 of the Code of Practice acknowledges the role of the planning system in the delivery of digital infrastructure:

'The planning system plays a key role in delivering the digital infrastructure that we need, in a sustainable and well-designed way, especially as households and businesses become increasingly reliant on mobile connectivity'.

5.2.20 Paragraph 17 sets out how wireless technology has evolved from 2G – 5G:

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

mobile generations, will be vital for a range of Internet of Things uses (IoT) and Smart City applications.

5.2.21 Paragraph 18 of the Code of Practice sets out the principles and commitments that operators should follow when developing their networks inter alia:

- Site sharing and use of existing structures: make use of existing structures, sites and masts wherever possible to reduce the need for new development.
- Consultation with local planning authorities, local communities and other stakeholders.
- Standardised and high-quality approach to planning applications, and the notification procedure: provide standardised supporting documentation for planning applications (where appropriate) within the context of national and local requirements.
- Compliance with guidance laid out in the International Commission on Non-Ionizing Radiation (ICNIRP) public exposure levels guidance.

5.2.22 The Code of Practice also sets out the requirements of the LPA in relation to the deployment of digital infrastructure:

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

5.2.23 Paragraph 22 of the Code of Practice acknowledge the limitations to siting and design:

'The choice over the site selection and design of equipment is primarily dependent upon the coverage and capacity requirements and technical constraints of a specific location, although operators should make efforts to reduce visual impacts where possible'.

5.2.24 Paragraph 23 goes on to advise that telecommunications development is sustainable development and should be supported:

‘There should be a presumption in favour of facilitating sustainable network development and, as such, operators and local planning authorities, as well as all other bodies involved in the deployment process, should work together to ensure connectivity needs are met and find viable solutions to deployment issues’.

5.2.25 The Code of Practice explains the operators site selection and that they use a range of sophisticated, computer-based planning tools to predict levels of signal strength and coverage from sites for 2G, 4G and 5G. For a site to be suitable it needs to have existing or ready access to a power supply, access to fibre optic cables, vehicular access and other buildings and development which may provide a level of existing screening. It acknowledges that operators typically look to upgrade existing infrastructure prior to considering a new deployment.

5.2.26 The Code of Practice sets out general siting and site selection principles including (para 25):

‘...where possible operators should look to use existing buildings/structures for hosting wireless infrastructure, to reduce the environmental impact of installation. Where the erection of a new ground-based mast is required, operators should seek measures to reduce the impact of the development, where possible. For example, measures such as siting near similar structures, screening, and using simple designs and appropriate colouring can help reduce the impact of the new infrastructure in certain locations’.

...’sharing sites should always be considered as this reduces the total number of sites/masts required for the network and also minimises the visual intrusion caused by wireless infrastructure. This may involve redeveloping an existing site, including installing a replacement mast that can accommodate additional radio equipment. However, the visual impact of site or mast sharing should be considered in the context of each individual location’.

5.2.27 A balanced approach is sought between the technical needs and constraints of the proposed site and the potential impact of the development (para 26 of the Code of Practice). There are three technical and operational considerations for the installation of sites:

- Coverage – wireless infrastructure needs to provide an appropriate level of coverage over the intended geographical area. This involves ensuring that antennas are elevated sufficiently (often via masts) to provide clear lines of sight for signals.
- Capacity – where existing network infrastructure can no longer meet demand for network capacity in a particular area, additional sites may be required within that coverage area to meet the demand.

- Backhaul – the radio access network requires a connection to the core network. Backhaul is sometimes provided by a microwave link, which requires a clear line of sight between the two ends of the link.

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

5.2.29 The Code seeks to mitigate the visual impacts when possible, such as the use of sympathetic designs, materials and colour to minimise the contrast between infrastructure and the area. The Code of Practice notes there are factors which affect the type of infrastructure that will be deployed including location and the coverage and capacity requirements. Planning authorities should be aware of these constraints when considering proposals. In urban areas, the Code acknowledges that where there is a high level of demand for mobile data, mobile base stations are likely to need to be deployed more densely. In these settings you can expect to see more use of streetwork monopoles.

5.2.30 Paragraph 30 of the Code of Practice notes that equipment cabinets are likely to be needed at most sites. They must be of sufficient size to facilitate hosting various operating equipment whilst also allowing air circulation to reduce the potential for overheating. Paragraph 31 goes on to advise that cabinets should be coloured appropriately to match surrounding street furniture or assimilate with the setting.

5.2.31 The Code of Practice notes that new ground-based masts will sometimes be required to accommodate the ever-increasing coverage and capacity needs of the country. 4G and 5G are likely to require further network densification in order to meet growing customer demand for data. This is the case in this instance. Where higher frequencies are used, with lower signal propagation characteristics, apparatus will need to be located in closer proximity to user devices. The type of mast deployed will depend upon the location and setting, as well as the coverage requirements of the site. The Code acknowledges that there are many ways by which the potential for environmental and visual impact of a ground-based mast can be reduced.

5.2.32 Paragraph 39 advises that all new masts should be sited, so far as practicable, so as to minimise their impact on their setting, including the landscape and any buildings. This includes sitting next to similar structures – e.g., streetworks masts should ideally be sited in line, and in harmony, with

existing vertical structures such as 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. Antennas will, however, need to be sufficiently elevated to clear the treeline.

5.2.33 Paragraph 40 relates to colouring and camouflage and states that where appropriate masts should be coloured to match their backdrop to minimise contrast in an urban setting. Streetworks monopoles can utilise design features such as shrouding or banding to protect visual amenity, though, for some 5G infrastructure, camouflage design solutions may not be practicable. Simple designs should be encouraged. Masts which have a complex design are more likely to dominate and be in discord with the landscape and have adverse visual impacts.

5.2.34 The Code of Practice states again in paragraph 64 that there are three primary technical and operational considerations for installation of radio base stations which are: ensuring that wireless infrastructure provides an appropriate level of coverage over the intended geographical area; ensuring that sites have sufficient capacity to meet user demand; and, requiring a connection to the wider network 'backhaul'. Paragraph 65 notes that planning authorities should take account of these constraints on network deployment and siting and design, when considering proposals.

5.2.35 Paragraphs 66 and 67 of the Code of Practice set out the 5G network deployment considerations:

'66. With the introduction of 5G, more equipment will be required to provide coverage and capacity. 5G, as well as 4G, are data-driven technologies, and high volumes of data will be transmitted between base stations and wireless devices. 5G will require a denser network of base stations than previous generations, including more fixed line fibre optic cable for reliable and high capacity backhaul. The siting of 5G installations will be more constrained and guided by these special technical and operational considerations.

67. Due to the scale and technological constraints of 5G equipment, in some cases previous camouflage design solutions, such as tree mast designs and concealing antennas in flagpoles, may not be practicable or suitable. In these cases, simple designs with particular attention to colouration and finishes may help reduce visual impacts on a site-specific basis.

5.2.36 Paragraph 69 encourages site sharing. However, it acknowledges that site sharing means that masts must safely accommodate equipment for all technologies (2G-5G) from multiple operators. Existing masts may be required to be strengthened or replaced with a larger, lattice-

type structure. This may be desirable and more appropriate in rural areas, but less so in more urban environments, where greater densities of base stations will be required.

5.2.37 Paragraph 72 refers to the area's topography and its impact on the radio signals:

'The physical layout of an area can have a significant impact on how radio signals travel. Radio signals will be blocked when they encounter raised land and therefore need to be transmitted over these areas to provide coverage. The taller the base station, or the higher its position on raised land, the better it can enable a larger area to be covered.'

UK Wireless Infrastructure Strategy – Department for Science, Innovation and Technology (April 2023)

5.2.38 The UK Wireless Infrastructure Strategy issued by the Government in April 2023, and sets out how the Government will deliver world-class digital infrastructure to all Britons over the next decade (see Appendix CTL 10 for relevant extracts of this strategy).

5.2.39 In the foreword by the Secretary of State for Science, Innovation and Technology, Michelle Donelan, acknowledged that:

'...wireless technology has transformed our world almost beyond recognition. Today, radio waves connect communities across the country not just with one another, but with the world thousands of miles beyond our shores, and the satellites hundreds of miles above our skies.

Connectivity has brought benefits for British households and British business, boosting growth, productivity, and opportunity for all. And change shows no sign of stopping...

5G will be the cornerstone of our digital economy. With higher capacity and lower latency, standalone 5G will drive growth in the industries of today and tomorrow, including in emerging sectors like artificial intelligence where Britain leads the world. Just take smart ports, where 5G-enabled remote operation can help us to move containers more quickly, efficiently, and safely, boosting our international competitiveness. 5G can improve our public services, too, in everything from education to social care. In transport, for example, we can use 5G to power forward progress in everything from real time travel information to augmented reality navigation and self-driving buses and taxis.

This is an incredible opportunity; widespread adoption of 5G could see £159 billion in productivity benefits by 2035.....It is my personal mission as the Department's first Secretary of State to put Britain right at the forefront of scientific and technological

progress. By bringing together world-class research and a dynamic business ecosystem, we can harness enterprise and innovation to grow the economy, driving forward the delivery of one of the Prime Minister's five priorities.

To do all this, we need world-class digital infrastructure...we have redoubled our efforts to build gigabit broadband in remote regions like Cornwall or Cumbria, together with our work to extend 4G coverage across the country through the £1 billion Shared Rural Network.

Today, we are setting our sights even higher, with our ambition to deliver nationwide coverage of standalone 5G to all populated areas by 2030, ensuring that we can bring its full benefits to villages and rural communities well beyond cities and towns.

Government will lead by example, putting wireless connectivity right at the heart of new and existing infrastructure to ensure that we do build infrastructure fit for the digital age. 5G will improve the safety, punctuality, and connectivity of our trains. Today, we are announcing that our new hospitals will be 5G or equivalent wireless enabled, enabling us to take advantage of cutting-edge healthcare innovations.

By flying the flag for 5G, government will drive private investment. We are also working with local authorities and businesses to ensure that they are ready for 5G - investing £40 million to create 5G Innovation Regions across the UK and building better markets by boosting competition and creating the conditions for informed consumer choice.

...We will strengthen the infrastructure that underpins these markets, too, by managing spectrum for the benefit of all, driving forward the rapid deployment of mobile networks...

5.2.40 The Minister of State for Digital Infrastructure, Julia Lopez, also highlights the importance of connectivity in her foreword to the UK Wireless Infrastructure Strategy:

'The more our lives are conducted online, the more access to the internet becomes critical for social and economic opportunity.

This is why delivering world-class digital infrastructure to all Britons is a fundamental mission of this government – and our efforts to build it is the modern equivalent in scale and ambition to the Victorian's construction of the railways. Our plan is for every corner of our country to get lightning fast connectivity, not only to give people real choices about where to live and work today but so they will not be left out of future technological revolutions because of poor infrastructure.

...the time is right to turn our sights to mobile connectivity, where the same sense of

mission is needed to deliver the kind of wireless infrastructure that will transform how we live our lives and run our economy. This is not simply a matter of improving download speeds as people browse the internet on their phones or dial into work calls. It is far more transformative than that.

The power of 5G and future telecoms advances will unlock new solutions in everything from industry to healthcare. Falling behind in coverage will mean falling behind in international competitiveness when it comes to the technologies of tomorrow, and failing to provide British people with innovative, life-enhancing services on secure, resilient networks’.

5.2.41 The Executive Summary sets out the prime minister’s five priorities for this Government –

‘...to build a better, more secure, more prosperous future for the UK, including growing the economy, and creating better-paid jobs and opportunity right across the country, which this strategy is focused on delivering.

We can only deliver on that priority with world-class digital infrastructure. Advanced wireless connectivity will be the foundation on which we build industries, jobs, skills and services for the future, and this strategy sets out our plan to harness its potential for our economy and our society.

The next decade will see seismic changes both in terms of what wireless connectivity can deliver and how we can use it. The economic and social benefits from these changes promise to be vast, from supercharging growth to accelerating our transition to net zero. But we can only realise these benefits with concerted action from government, industry, and others. This strategy sets out our plan to do just that...’

5.2.42 The Strategy indicates why the Government that already has a high bar of digital connectivity, aspires to set it even higher. It notes that 2G and 3G mobile networks opened up a new realm of connectivity and mobile communication, but these legacy technologies are being phased out over the course of the next decade to free up spectrum for next generation networks and remove barriers to new companies entering the telecoms supply chain.

5.2.43 The Strategy goes on to acknowledge that:

‘4G revolutionised the way people use their mobile phones, supporting access to bandwidth hungry content on platforms like YouTube. Today, a 4G mobile phone can process data four times as fast as a 2G equivalent at the turn of the millennium.

By building world-class, secure digital infrastructure networks, we can realise the vision we set out in our Digital Strategy for a competitive and innovative digital economy, support our vision for new technologies like that set out in the AI Regulation White Paper and deliver on our commitment to grow the economy.

underpinning other new technologies - the next decade will see the development and maturation of transformative technologies from AI and self-driving vehicles to digital twins, which will drive demand for advanced wireless connectivity. Our £200 million 5G Testbeds and Trials Programme invested in a wide range of projects from testing healthcare applications in Liverpool to delivering 5G music lessons between Bristol and London to help build the business case for investment in 5G applications. But this is only the beginning.

transforming public services - there are also significant benefits for improving our public services, supporting smart cities which are cleaner and less congested and delivering connectivity to our schools and hospitals that will provide better, more interactive lessons and personalised healthcare.

By transforming our economy, widespread adoption of 5G can bring a cumulative productivity benefit of £159 billion by 2035, driving growth and inward investment, and improving lives for communities in every corner of the country. By ensuring that everyone can access the technology they need, including through specific support for rural economies by enabling applications such as agritech, we can make it as easy to start and scale up a digital business in rural Yorkshire as it is in central London.

- 5.2.44** The strategy sets out how the UK will maximise the potential of advanced wireless networks over the next decade securing international competitiveness for the future and driving economic growth across the UK. Given the substantial potential that 5G offers for businesses and public services delivery the Government wants to move beyond the basic 5G that is being deployed now over 4G networks to build higher quality, standalone 5G networks that do not rely on older infrastructure. The Government also wants to extend 5G coverage well beyond cities and towns to all populated areas of the UK, including rural villages and communities.
- 5.2.45** To drive good connectivity for all the Government is taking action on reporting. It has asked Ofcom to continue to hold the mobile network operators to account through on-the-ground signal testing and to improve the accuracy of its coverage reporting through increased use of crowdsourced data. It has also asked Ofcom to consider how it can improve the accuracy of reporting of network performance levels in rural areas and for indoor coverage, to help policy

makers and industry understand where coverage improvements are needed.

- 5.2.46** Chapter 2 of the UK Wireless Infrastructure Strategy relates to ensuring good connectivity across rural and urban areas. It states that:

‘The government’s priority to build a better, more secure, more prosperous future for the UK includes a clear commitment to grow the economy, and create better-paid jobs and opportunity right across the country. To do this, it is vital that people who live and work in all parts of the UK, including in rural areas, have access to good quality mobile and broadband coverage’.

- 5.2.47** The strategy acknowledges that wireless connectivity can play a crucial role in delivering fixed broadband to the hardest to reach areas of the country. It goes on to note that world-class digital infrastructure underpins the digital economy and is worth £143 billion in 2021 accounting for 5% of the national workforce. This infrastructure provides the backbone of the UK economy and society with ever more jobs, public services and societal interactions built upon its foundations. As growth in the digital sector is nearly six times faster than across the economy as a whole, its importance will only continue to increase as the Prime Minister’s priority to grow the economy is delivered. 4G technology revolutionised the way people use their mobile phones. We have seen the growth of streaming services, like Netflix and Spotify, and gained constant access to high quality, user-produced content for free on platforms such as YouTube, transformed the way we shop on line, travel around cities access to apps like Uber and use public services such as booking NHS appointments through apps. According to Ofcom’s Communications Market Report, there are already close to 100 million mobile subscriptions in the UK, and a significant and growing number of machine-to-machine subscriptions.

- 5.2.48** The UK Wireless Infrastructure Strategy notes the far reaching benefits of 5G:

‘5G can offer significantly better performance and support a far greater range of use cases. 5G enables data transfer speeds of more than 10 times faster than 4G, has the potential to offer lower latency and greater reliability and the ability to connect more devices. The implications of these improvements reach far beyond the potential to develop the capabilities of smartphones, enabling an array of innovative use cases and providing for transformative economic, and social benefits that were perhaps unimaginable a decade ago’.

- 5.2.49** The Strategy goes on to note that 5G can be a critical enabling technology. It can help increase productivity and efficiency by driving autonomous machines, enabling asset tracking and predictive maintenance and increasing the lifespan of machinery. In the public sector, 5G can

support remote healthcare monitoring and smart city applications.

5.2.50 Research commissioned by the Government estimated that:

'if adopted at scale, 5G could enable productivity gains that add £159 billion in cumulative GVA between now and 2035, reflecting a potential annual GVA increase of £37 billion by 2035. 5G can transform public services and grow the economy, making factories and work places more productive and creating better paid jobs, delivering on this government's key priorities. 5G is also a foundational technology for other technologies, including augmented and virtual reality which could potentially increase UK GDP by £62.5 billion by 2030'.

5.2.51 The Strategy acknowledges that realising these benefits relies on the UK's wireless network providers investing in high-quality public 5G networks and private networks utilising 5G and other advanced wireless technologies such as WiFi 6 and 7.

Conclusion

5.2.52 At the heart of the National Planning Framework is a presumption in favour of sustainable development. Development proposals that accord with the development plan should be approved without delay.

5.2.53 The National Planning Policy Framework acknowledges that advanced, high quality and reliable communications infrastructure is essential for sustainable economic growth and social well-being. The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth and the social benefits. Therefore, significant weight should be placed on the need to support economic growth and social well-being through the planning system. Planning policies should recognise and seek to address potential barriers to investment, including any lack of infrastructure.

5.2.54 The development of high-speed broadband technology and other communications networks plays a vital role in enhancing the provision of local community facilities and services. As such, the Government strongly encourages local planning authorities to support the expansion of electronic communications networks and next generation mobile technology including 5G.

5.2.55 The Government aims to limit visual intrusion through keeping the number of radio and telecommunications masts to a minimum. Where new sites are required (such as for new 5G networks) equipment should be sympathetically designed and camouflaged where appropriate.

5.2.56 The Government provides clear advice to decision-takers at every level stating that they should

seek to approve applications for sustainable development where possible. Local planning authorities should also work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area.

- 5.2.57** The new Code of Practice replaces the previous Code of Practice, and in full conformity with the NPPF and Government aspirations continues to support the development of mobile coverage wherever it is needed. The Code acknowledges 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. The Code notes that as the demand for mobile data in the UK is increasing rapidly, it is important that everyone has access to dependable and consistent mobile coverage where they live, work and travel.
- 5.2.58** The Code highlights that all wireless network installations are principally guided by the technical need for the site and the technical constraints placed upon transmitting a signal. The siting and design of such installations must therefore be balanced between visual impact and these needs and constraints. These issues should be considered alongside the public benefit of improved connectivity.
- 5.2.59** The UK Wireless Infrastructure Strategy sets out how Government will deliver world-class digital infrastructure to all Britons over the next decade. The plan is for every corner of the UK to get lightning fast connectivity, not only to give people real choices about where to live and work today, but so that they will not be left out of future technological revolutions because of poor infrastructure.
- 5.2.60** The Wireless Infrastructure Strategy acknowledges that falling behind in coverage will mean falling behind in competitiveness when it comes to the technologies of tomorrow, and failing to provide British people with innovative, life-enhancing services on secure, resilient networks. The Strategy notes that 5G will be the cornerstone of our digital economy.
- 5.2.61** The Strategy acknowledges that advanced wireless connectivity (world class digital infrastructure) is the foundation on which we build industries, jobs, skills and services for the future. Wireless connectivity supercharges growth to accelerating the UK transition to net zero.

6.0 THE DEVELOPMENT PLAN

6.1 Introduction

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

6.1.2 The statutory development plan as defined by the Planning and Compulsory Purchase Act 2004 comprises the Rochdale Unitary Development Plan and Rochdale Core Strategy.

6.2 Rochdale Unitary Development Plan Policies (Adopted 2006)

6.2.1 The Rochdale Unitary Development Plan (Rochdale UDP) was adopted on June 2006 and forms the development plan. It is the basis for decisions on land use planning in Rochdale. The Rochdale UDP is used by the Council to guide future use of land and buildings as well as manage development (see Appendix CTL 11 for relevant extracts of Rochdale UDP), providing a basis by which planning applications will be determined.

6.2.2 The Rochdale UDP does contain policies which relate to telecommunications. However, this policy is now outdated as the UDP was initially implemented for use up to 2016. The UDP is still in place until the Allocations Development Plan is adopted. The Council in their decision making exercise does not reference the Rochdale UDP, despite it still being used to inform decisions.

6.2.3 The most relevant policy relating to this proposed radio base station is CF/6 – Telecommunications.

“Applications for planning permission or for prior approval (as required under Part 24 of the Town and Country Planning (General Permitted Development) Order 1995) for telecommunications masts, satellite and terrestrial microwave antennae on masts, and satellite and terrestrial microwave antennae on a building or structure will be permitted where the following requirements are met:

a) In the case of satellite and terrestrial microwave antennae on a building or structure the equipment is not detrimental to the character and design of the building or structure, to the character of the local street scene or to the visual amenity of the area.

b) In the case of telecommunications masts the development is not detrimental to the character and appearance of the local street scene or the visual amenity of the area.

c) The opportunity is taken to share sites or erect telecommunications equipment on an existing mast, building or other structure, unless this would be unacceptable in terms of increased height or visual clutter.

d) An applicant provides evidence of compliance with the Government guidelines on health impact of telecommunication use.

e) The equipment is sited and designed so as to minimise its visual impact subject to technical and operational considerations; and

f) The operator removes any apparatus when it becomes redundant.

The Council will use conditions and, where necessary, legal agreements to secure the above'.

6.3 Rochdale Core Strategy (Adopted October 2016)

6.3.1 The Core Strategy was adopted on October 2016 and sets out the long-term spatial strategy for future development, see Appendix CTL 12 for relevant extracts of Rochdale Core Strategy. The Core Strategy sets the overall direction of growth and development and all other Local Plan documents will need to conform with it.

6.3.2 There are no specific policies relating to telecommunications in the Core Strategy. The Council has refused the application on a more general Core Policies, Policies E1, P1, P3 and DM1. Policy E1 relates to establishing thriving town, district and local centres (see appendix CTL 12 for the full policy):

'We will focus retail, leisure, cultural, office, residential and other development to promote the viability and vitality of all the borough's town centres to maintain them as thriving and sustainable centres and the preferred shopping and leisure destinations for people living, working and visiting the borough. We will also ensure the provision of a hierarchy of accessible district and local centres and shops that meets people's daily shopping needs...'

6.3.3 Policy P1 relates to improving the image of the borough and high quality design:

'a. Requiring design which is of a high standard, demonstrating innovation and originality;

b. Working with developers of major developments to incorporate public art in the design of buildings and spaces or contribute to public art projects as appropriate;

c. Helping to 'green' the urban environment, for example by securing tree planting on sites and along streets and roads;

d. Promoting the development and re-use of under-used land and buildings, maximising the potential for heritage assets to provide a sense of place and image; and

e. Creating people-friendly, safe, vibrant, uncluttered public areas'.

6.3.4 Core Policy P3 relates to improving design of new developments. The policy requires for all new developments to adhere to high standards of design in the area where it is located. It should enhance the boroughs identity and sense of place by having regard to:

'Enhance the borough's identity and sense of place, by respecting context where it is positive and having regard to the scale, density, massing, height, layout, landscape, materials and access of surrounding buildings and areas in general'

6.3.5 Similarly, Core Policy DM1 relates to all development and it must take into account all relevant policies within the Local Plan. The Policy is similar to Policy P1 and P3 as all developments will be expected to demonstrate:

'a. Are of high quality design and take the opportunity to enhance the quality of the area;

b. Are compatible with surrounding land uses, both in terms of its impact upon those uses and the impact of the surrounding land uses upon the amenities of future residents / users;

c. Do not adversely affect the amenity of residents or users through visual intrusion, overbearing impact, overshadowing or loss of privacy'.

6.3.6 The Core Strategy promotes sustainable development as the Core Strategy is centred around delivering and supporting sustainable development. The Core Strategy promotes sustainable development as it should deliver economic, social and environmental objectives in an integrated and balanced way. Core Policy SD1 states:

'When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work pro-actively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this Local Plan will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or*
- Specific policies in the National Planning Policy Framework indicate that development should be restricted’.*

6.4 Places for Everyone Joint Development Plan (Adopted March 2024)

- 6.4.1** The Places for Everyone Joint Development Plan is a collective agreement and plan between Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan. It was formally adopted in March 2024 by all local planning authorities in the Greater Manchester region (see Appendix CTL 13 for relevant extracts).
- 6.4.2** In 2019 Greater Manchester set out bold plans to give people, communities and businesses hope and confidence for the future. However, the impact of Covid 19 has had a on the way people live and work over the shorter term with a high degree of uncertainty over its impact in the long term. In response the Government has been very clear that we need to positively plan for recovery. The Government first made commitments to supporting economic recovery in mid-2020, for example with the Prime Minister's Build, Build, Build announcement at the end of June 2020 setting a context for England as recovered from Covid-19.
- 6.4.3** The vision is to capitalise on the opportunities which were brought about the recent pandemic... the borough need to be places where people have access to the services they require through high quality digital communications.
- 6.4.4** The Places for Everyone Joint Development Plan provides an important opportunity to create the conditions for inclusive economic growth.
- 6.4.5** By the end of the Plan period, Greater Manchester aims to be a top global city. To do this it will require a range of attributes, including a strong economy, skills residents, a high quality of place and the environment, and a diverse portfolio of investment and development opportunities.

6.4.6 The vision for Greater Manchester is set out in the Greater Manchester Strategy:

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

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

6.4.7 To meet the vision, the plan sets out 10 objectives. The most relevant to telecommunications are below:

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

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

Objective 7: Playing our part in ensuring that Greater Manchester is a more resilient and carbon neutral city-region

- Promote sustainable patterns of development that minimise the need to travel and contribute to cleaner air;*
- Locate and design development to reduce car dependency.*

Objective 9: Ensure access to physical and social infrastructure.

- Ensure that our communities and businesses are supported by infrastructure;*
- Improve the capacity and network coverage of digital, energy, telecoms, transport and water in key growth locations.*

6.4.8 Policy JP-S1 refers to sustainable development

‘To help tackle climate change, development should aim to maximise its economic, social and environmental benefits simultaneously, minimise its adverse impacts, utilise sustainable construction techniques and actively seek opportunities to secure net gains across each of the different objectives’.

6.4.9 Policy JP-S1 refers to Sustainable Places and is referenced for all development. Key attributes should be consistent with:

‘1. Distinctive, with a clear identity that:

A. Conserves and Distinctive, with a clear identity that: Distinctive, with a clear identity that: A enhances the natural environment, landscape features, historic environment and local history and culture;

B. Enables a clear understanding of how the place has developed; and

C. Respects and acknowledges the character and identity of the locality in terms of design, siting, size, scale and materials used’

5. Adaptable, able to respond easily to varied and changing needs and technologies

14. Well-connected to other places, particularly by public transport and digital infrastructure enabling everyone to take advantage of the employment, cultural and leisure opportunities across Greater Manchester and beyond’.

6.4.10 Chapter 10 of the Places for Everyone Joint Development Plan document details how the Greater Manchester region will become more connected and integrated.**6.4.11** Para 10.3 directly states that digital connectivity is growing in everyday life. The use of being able to be digitally connected allows people to connect with people wherever they are and access to a range of learning, employment and retail opportunities.**6.4.12** Para 10.21 acknowledges the rise in digital demand and the continuous of the demand is likely to continue. The area is to become “smarter” with services to adopted innovations such as connected and autonomous vehicles, artificial intelligence and the Internet of Things (where an increasing range of everyday devices are connected, monitored and operated via the internet). It is the Greater Manchester ambition to be the UK’s leading digital city and one of Europe’s top five.

6.4.13 Policy JP-C1: An Integrated Network outlines how Greater Manchester will meet its low carbon emissions target through world-class connectivity. This includes a range of measures:

1. Delivering a pattern of development that minimises both the need to travel and the distance travelled by unsustainable modes to jobs, housing and other key services, including healthcare, education, retail, recreation and leisure facilities, green space and green infrastructure;

2. Enabling the provision of high quality digital infrastructure’.

6.4.14 Chapter 10 goes further to reference the importance of digital connectivity. Paragraph 10.29 refers to the opportunities that digital connectivity can bring are unprecedented and everyone should have the opportunity to access them so they can fully participate in society and the economy.

6.4.15 Paragraph 10.30 notes a global city requires digital infrastructure to be competitive and support high levels of social inclusion:

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

6.4.16 Paragraph 10.33 recognises the growth and development that digital infrastructure and capability goes through. The evolution of digital connectivity through next generation technology has increased and so has the speed that it evolves. Digital infrastructure is therefore needed to adapt and evolve.

6.4.17 The plan directly supports the provision of affordable, high quality, digital infrastructure with Policy JP-C2 digital connectivity. In making decisions the plan supports a range of measures, including:

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

6.5 Greater Manchester Strategy 2025 – 2035 (Adopted July 2025)

6.5.1 This Greater Manchester Strategy sets out the collective vision for Greater Manchester over the next decade (see Appendix CTL 14 for the relevant extracts). Greater Manchester has become the UK's fastest growing economy, the Strategy aims to build upon the recent successes.

6.5.2 The vision for Greater Manchester in the next 10 years:

'Our collective vision for the next decade is a thriving city region where everyone can live a good life'

6.5.3 In order to create a thriving city region where everyone can live a good life, the strategy will focus on:

'Digitally connected places and people'

6.5.4 Section 4 of the Greater Manchester Strategy sets out what residents and those living in Manchester will feel from the Strategy including digitally connected places and people:

'Greater Manchester will be a fully digitally enabled region, which means using digital technology in ways that make things quicker and easier to achieve our ambitions.'

'We are committed to using technology and data proactively and responsibly, giving people the connectivity, tools and know-how to work and live smarter'.

6.5.5 Not only will people be connected, also the digital services the local authorities offer, they will be fit for the long-term future:

'We will treat people as names not numbers and offer solutions that respond to different needs. We'll switch from a reactive to a preventative approach, with support provided sooner to reduce the need for crisis interventions.'

'Digitally enabled and data driven, our public services will help create a strong workforce, able to do their jobs so our people, our places and our businesses can thrive'.

6.5.6 Moving onto section 5 of the Greater Manchester Strategy, in 2020 a report was commissioned looking at the inequalities being experienced in Greater Manchester, including digital connectivity. The report found that almost 400,000 people in Greater Manchester are digitally excluded with more than one million lacking essential digital skills. These inequalities lead to barriers in work and wellbeing.

6.5.7 The Strategy acknowledges we are now living in an increasingly digital world. Household demand for data is 20 times higher than in 2012, the reduction and turn off in traditional landlines is increasing due to the looming deadline of January 2027.

6.5.8 Section 7 refers to digitally connected places and people. The Strategy wants to end the digital divide and ensure every resident can access the internet wherever they may be and no matter their age or situation. The strategy aims for all areas of Greater Manchester to benefit from 5G coverage by 2030:

'By 2030 all areas of Greater Manchester will benefit from next generation gigabit-capable broadband and 5G coverage, with support to get online available in every neighbourhood'

6.5.9 The Strategy will ensure all Greater Manchester public services are digitally enabled. This includes but not limited to, integrated ticketing systems on buses and trams, Early Years App aiding with child development and the use of AI to improve public services.

6.6 Greater Manchester Local Industrial Strategy (Adopted June 2019)

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

6.6.2 It aims to put in place the integrated 21st century infrastructure needed for digital driven, clean and inclusive growth.

6.6.3 A top 5 city-region for the digital economy in Europe, with full fibre broadband and 5G coverage.

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

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

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

Existing partnerships are working to improve digital infrastructure in the city-region to

meet national targets of roll out of 5G technologies for most people by 2027’.

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

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

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

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

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

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

6.6.10 The Local Industrial Strategy acknowledges that GM will aim to become one of the best digitally connected city-regions in the UK. It fully supports the development of 5G networks. See Appendix CTL 15 for the relevant extracts of this Local Industrial Strategy.

6.7 Greater Manchester Strategy 2021 – 2031

6.7.1 The foreword to this Strategy states:

‘This Strategy sets out the clear outcomes and commitments to be delivered. We will use these to further our relationship with central Government, investors and collaborators, providing a platform for our future and how we would like to work in partnership to achieve our shared vision. Through this Strategy we provide a clear line of sight between our priorities, the ways we work, and how we deliver to support residents, places and businesses in meeting their needs, and ensuring our services are responsive to the lived experience of Greater Manchester’s citizens. We will maximise opportunities and be responsive to fiscal events, ensuring available resources, flexibilities and accountabilities are aligned and delivering in support of our vision.’

- 6.7.2** Greater Manchester is aiming to become a world leading digital city by 2031. Greater Manchester plays a fundamental role in driving economic growth.
- 6.7.3** The Strategy notes that in terms of mobile internet, despite good public Wi-Fi coverage in most public buildings across Greater Manchester, and on Metrolink and many buses, Wi-Fi provision is patchy in public places and there are still barriers to access (registration requirements and cost) in many parts of Greater Manchester.
- 6.7.4** The Strategy also acknowledges that digital exclusion is closely linked with social exclusion.
- 6.7.5** The Strategy states that the connectivity which Greater Manchester requires is to increase average mobile and fixed broadband internet speeds and aims to improve call and mobile coverage including securing a national 5G test bed status thus positioning Greater Manchester at the forefront of next generation 5G mobile. See Appendix CTL 16 for relevant extracts of this Strategy.

6.8 Greater Manchester Digital Blueprint 2023 – 2026 (adopted February 2020 and refreshed May 2023)

- 6.8.1** The GM Digital Blueprint (see Appendix CTL 17 for extracts) builds on the Greater Manchester Strategy. It states that this blueprint sets out the next chapter in Greater Manchester's ambition to be recognised as a world-leading digital city region, with an ongoing commitment to taking an open, innovative and connective approach to delivering that ambition.
- 6.8.2** The Blueprint states that Greater Manchester remains committed to being a digital city-region. The ambition is still for Greater Manchester to be a top 5 European Digital City-Region and recognised globally for its digital innovation. Benefitting from top level physical infrastructure, and a highly skilled, ready-to-go digital workforce.
- 6.8.3** The Blueprint goes on to say that this is the place that does digital differently.

"We want our citizens' lives to be bettered, and for them to be empowered by the myriad of opportunities a digitally fuelled city-region provides".

- 6.8.4** The Blueprint for Greater Manchester digital sets 5 priorities for the 2023 -2026 period:

... 'investing heavily in digital infrastructure, connectivity and transport offering breadth and depth of expertise across digital and creative services, e commerce, technology, hardware and software.

We're creating a digital place where innovators from across the globe want to tap into

and a place where businesses already here can thrive’.

6.8.5 Home to the largest digital and creative cluster outside of London. The digital, creative and tech sectors are the fastest growing sector within the city-region with almost £5bn of economic activity with new high-value jobs being created each year.

6.8.6 The Greater Manchester City-Region is the best place in the UK for IT Pros to live and work.

6.8.7 The digital priorities are set out as follows:

- Empowering people and communities:
 - *‘We want to ensure that everyone in Greater Manchester, whatever their age, location or situation, can benefit from the opportunities digital brings’.*
- Building responsive, data driven public services:
 - *‘We want to apply exemplar digital ideas and practice to delivering public services in Greater Manchester, linking innovative business, academic and public sector thinking with the needs of Greater Manchester’s people’.*
- Digitally enabling a resilient and prosperous economy:
 - *‘Businesses of all sizes should have the means and skills to digitise their business and make the most of the opportunities that brings’.*
- Creating connected, inclusive, sustainable places:
 - *‘We’re encouraging and supporting businesses to start, grow or move to Greater Manchester, recognising the importance of the continued expansion of our digital, creative and tech sector and the opportunities this brings for our people’.*
- Being a global digital influencer:
 - *‘Greater Manchester is taking its position as an internationally recognised centre of digital innovation, research and practice’.*

6.8.8 The Blueprint acknowledges that Greater Manchester is leading the way on 5G and:

‘Greater Manchester is at the forefront of 5G rollout in the UK through collaboration with telecoms partners, local authorities and the main property holders. Our aim is to continue to be.

6.9 Greater Manchester Infrastructure Framework 2040 (GMCA)

- 6.9.1** This is a pre-cursor to the GM Infrastructure Strategy. The aim is to focus on developing infrastructure which ultimately improves the lives of all those living and working within Greater Manchester. See Appendix CTL 18 for relevant extracts to this Framework.
- 6.9.2** The Infrastructure Framework acknowledges a number of key challenges, one of which is digital and the need to provide pervasive, affordable, resilient digital connectivity. The Framework notes that *‘Digital technology is increasingly the backbone of the major industries and our daily lives’*.
- 6.9.3** The Framework goes on to state that approaching 2040, GM will need to be a Smart and digitally ready City Region. To achieve this, and support on-going digitalisation, the region will require resilient fixed connectivity (through fixed fibre) supported by 5G (and subsequent technologies). It will also need to streamline the process for installation of new infrastructure within the street space.
- 6.9.4** The Framework notes the vision for the GM Infrastructure Strategy:

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

The Greater Manchester Infrastructure Strategy should seek to:

- *Support the lives and well-being of people, communities and the environment within Greater Manchester.*
- *Be age-friendly and support the economic and social participation of both young and old.*
- *Support strategically identified growth for parts and communities within Greater Manchester.*
- *Be flexible, robust and meet the existing and future needs of the communities and technological change.*
- *Provide world-class connections and access to opportunity for all.*
- *Provide world-class digital infrastructure which provides a platform for GM to*

embrace emerging technological and societal changes.

- *Support a carbon-neutral GM and be economically, environmentally and socially sustainable.*

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

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

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

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

ensures a future-proofed platform for the development of these and many new technologies for years to come.

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

6.9.7 ‘Future digital infrastructure will need to be supported by 5G and beyond’ the Framework acknowledges.

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

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

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

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

6.9.11 With regards to the Regional Centre if Challenge 8 is to be met to provide pervasive, affordable, resilient digital connectivity the challenge is **early roll out of 5G especially in areas where**

mobile data use is congested such as the Regional Centre (emphasis added).

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

7.0 PLANNING ISSUES

- 7.1.1** The main issues arising from this planning appeal is whether the proposed development would have an adverse impact on local amenity and the character of the surrounding area and whether the lattice tower and associated equipment would be incongruous and dominant feature within the area, that would result in excessive clutter detrimentally affecting visual amenity and the spatial character of the location. Another primary consideration is whether the perceived harm would outweigh the significant social and economic benefits associated with the provision of the latest 4G and new 5G services attributed to the proposal and other valid material considerations as outlined within NPPF, Rochdale Unitary Development Plan, Rochdale Core Strategy, Places for Everyone Joint Development Plan, Greater Manchester Strategy 2025 – 2035, Greater Manchester Local Industrial Strategy, Greater Manchester Strategy 2021 – 2031, Greater Manchester Infrastructure Framework 2040 and the UK Wireless Infrastructure Strategy. Another important consideration is whether there are any alternative options which would provide similar coverage without affecting visual amenity with a justification as to why these are not able to be used.
- 7.1.2** The Council's reason for refusal (See Appendix CTL 2) relates to concerns regarding the appeal proposal's perceived impact upon character of the surrounding area being incongruous and dominant feature within the streetscene.
- 7.1.3** At the beginning of their delegated report, the case officer accepts the principle of development to be in conformity with policies E1 of the Rochdale Core Strategy, Policy JP-C2 of the PforE Joint Development Plan and the NPPF. As will be discussed later in this statement of case, the social and economic public benefits that are associated with digital connectivity outweigh the perceived harm from the proposed development.
- 7.1.4** The site sits south of Moorgate Conservation Area, circa 67m away from the boundary of the Conservation Area. The site cannot be seen on the appraisal map below on figure 8 due to the title placement.



Figure 8: Map of Moorgate Avenue Conservation Area (source: <https://www.rochdale.gov.uk/downloads/download/191/list-of-conservation-areas-maps-and-appraisals>)

- 7.1.5** The delegated report confirms there were no comments received during the period of the application from the Conservation Officer, however the case officer notes the previously refused design is of similar height and the bulk has been reduced, therefore they have carried the comments over. The comments confirmed:

“the proposal is not considered to have any unacceptable impact upon the adjacent heritage assets, and is compliant with Policy P2 of the Rochdale CS, and the relevant policies contained within the NPPF”.

- 7.1.6** Despite this confirmation, the case officer later on in their delegated report within the alternative sites section contradicts this conclusion:

“Therefore, from the submitted sequential assessment, it would not be possible to definitively conclude that there are no more suitable sites reasonably available that would result in a lesser degree of visual harm, harm to the amenity of nearby occupiers and harm to the significance of heritage assets. Taken as a whole, would fail to comply with the requirements of paragraphs 119 to 120 of the NPPF”.

7.1.7 In line with Paragraph 207 of the NPPF, the significance of the Conservation Area and its contribution to the area is compared with the appeal proposal. Moorgate Conservation Area was established to protect the area's distinctive Edwardian residential character. It covers areas of Bury Road and Broadhalgh Avenue. At the time of appraisal, it was Rochdale's first new conservation area in around 30 years when it was first designated in 2005.

7.1.8 The Moorgate Conservation Area aims to safeguard a fine example of Edwardian residential architecture in Rochdale. With strong community backing and planning endorsement, it's a key initiative to ensure sensitive protection and enhancement of local heritage values.

7.1.9 There are a number of key characteristics that are associated with the Conservation Area, including:

Architectural Style: Primarily Edwardian terraced housing, featuring traditional materials like brick and slate, sash windows, detailed brickwork, and ornate door surrounds.

Urban Layout: The streets have a formal, planned layout with wide avenues, front gardens, and uniform building lines—reflecting early 20th-century suburban development.

Special Features: Mature trees, original boundary walls, decorative stonework, and cohesive streetscape contribute to the area's charm and historical value.

7.1.10 When considering the masts impact on the setting of the Conservation Area given the separation distance, screening and other modern man-made vertical elements in the area, the appellant considers there will be “no harm” to the conservation area explained in detail below.

7.1.11 Historic England's 'The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (GPA3) states that ‘*setting is not itself a heritage asset, nor a heritage designation*’ (appendix CTL 19 for relevant extracts). Hence any impacts have to be described in terms of how they affect the significance of a heritage asset, and heritage values that contribute to this significance, through changes to setting. ‘*Conserving or enhancing heritage assets by taking their settings into account need not prevent change*’.

7.1.12 Preservation does not mean no change, it specifically means no harm. GPA2 (Historic England's Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning: 2) states that ‘change to heritage assets is inevitable but it is only harmful when significance is damaged’. Thus change is accepted in Historic England's guidance as part of the evolution of the landscape and environment. It is whether such change

is neutral, harmful or beneficial to the significance of an asset that matters (see appendix CTL 20 for a copy of the relevant extracts).

- 7.1.13** The PPG provides further clarity on what is meant by the term ‘public benefit’, including how these may be derived from enhancement to the historic environment (‘heritage benefits’), as follows:

“Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.

Examples of heritage benefits may include:

- *sustaining or enhancing the significance of a heritage asset and the contribution of its setting*
- *reducing or removing risks to a heritage asset*
- *securing the optimum viable use of a heritage asset in support of its long term conservation”.*

- 7.1.14** Descriptions of significance will naturally anticipate the ways in which impacts will be considered. Hence descriptions of the significance of Conservation Areas will make reference to their special interest and character and appearance, and the significance of Listed Buildings will be discussed with reference to the building, its setting and any features of special architectural or historic interest which it possesses.

- 7.1.15** In accordance with the levels of significance articulated in the NPPF and the PPG, three levels of significance are identified:

- ***Designated heritage assets of the highest significance***, as identified in paragraph 194 of the NPPF, comprising Grade I and II* Listed buildings, Grade I and II* Registered Parks and Gardens, Scheduled Monuments, Protected Wreck Sites, World Heritage Sites and Registered Battlefields (and also including some Conservation Areas) and non-designated heritage assets of archaeological interest

which are demonstrably of equivalent significance to Scheduled Monuments, as identified in footnote 73 of the NPPF;

Designated heritage assets of less than the highest significance, as identified in paragraph 194 of the NPPF, comprising Grade II Listed buildings and Grade II Registered Parks and Gardens (and also some Conservation Areas); and

Non-designated heritage assets. Non-designated heritage assets are defined within the PPG as “buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets”.

7.1.16 In order to relate to key policy, the following levels of harm may potentially be identified for designated heritage assets:

- ***Substantial harm or total loss***. It has been clarified in a High Court Judgement of 2013 that this would be harm that would “have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced”; and

- ***Less than substantial harm***. Harm of a lesser level than that defined above.

7.1.17 As such, the appellant is in the opinion, there will *no harm* to the setting of the Conservation Area. The separation distance away from the Conservation Area, combined with the intervening trees, buildings and other modern man-made features including the existing monopoles already situated on the land, the mast will be viewed against results in no change to the setting of the Conservation Area. This is further emphasised by the Council’s own Conservation Officer raising no overall concern in the initial design, which was bulkier than this proposed appeal design, instead stating the impact would be neutral.

7.1.18 The site remains in the same location as the previous refusal which provides a separation distance between the tower and the boundary of the Conservation Area, circa 60m away from the site. There are intervening trees situated within the rugby club screening the lower elements of the tower, ball stop netting along the rears of the properties to Broadhalgh Avenue with 2 storey residential properties situated along Broadhalgh Avenue and mature trees on their frontages. Therefore, given the separation distance and the intervening features will result in the lattice tower not being overly visible from the Conservation Area or the non-designated locally important buildings 13 and 15 Broadhalgh Avenue.

7.1.19 The delegated report refers to the area being “*uncluttered*” with “*limited street furniture*”. The

appellant disagrees with this description of the area. On the contrary, the area hosts 3 monopoles for 3 different operators, including VMO2 and VodafoneThree. Each monopole is uniform in height, this is accepted, however they are each 15m in height. Further to this, there are the rugby posts which can vary between 13-17m in height, netting around the residential properties and flood lights also rising to 15m in height.

- 7.1.20** Evidenced above, the area does have a number of vertical modern elements, contrary to the case officer's opinion, the area is uncluttered. There are also semi-mature / mature trees in the nearby area which the proposed mast would be sited against. These rise to some 10m in height. The appeal proposals fully accord with the Code of Practice for Wireless Network Development in England (March 2022). The radio base station has been sited adjacent to the trees and other vertical elements which will limit the impact of the proposal in the surrounding landscape. The colour of the mast and cabinets will be galvanized which will blend in with the often grey sky.
- 7.1.21** The Code of Practice goes on to advise that operators should see to share sites where possible as site sharing reduces the number of sites required and network proliferation. The proposed installation will enable 3 of the 4 main telecommunications operators to utilise the same structure. In turn, once this installation is in place and operational, one of the three monopoles currently supporting the VMO2 and VodafoneThree equipment will be removed. Similarly, should the existing ThreeUK equipment become redundant in the future, it will be removed and the ground reinstated, in line with planning and licence requirements. This will reduce proliferation of masts in the area in line with the NPPF and Policy CF/6 of the Rochdale UDP.
- 7.1.22** Explained above at paragraph 3.3, ThreeUK will retain their existing monopole in place for the time being whilst they configure their network with Vodafone as part of the merger. This will ensure a site is not removed from the network in the event a site is still required here to cope with the demand from operators consumers. It ensures sufficient coverage and capacity is retained for this operator, whilst the operators evaluate their merged network requirements and abilities. Should the existing ThreeUK equipment become redundant in the future, it will be removed and the ground reinstated, in line with planning and licence requirements.
- 7.1.23** Despite the Supplementary Information Statement clearly explaining that the requirement for a radio base station in this location was to replace the existing coverage for two operators (at the time of submission and decision) and provide new 5G coverage in the area from one installation, the case officer has failed to understand the technical constraints the operator faces when siting a replacement mast.
- 7.1.24** A lattice tower was chosen due to its structural capabilities. It can host multiple operators, unlike

a streetwork monopole, which are not structurally stable enough to host 3 operators 2G, 4G and the latest 5G equipment. The orientation of the antennas also has better capabilities, instead of being restricted to the bearings set on a monopole, lattice towers allow for antennas to be located on the struts. This allows for the radio planner to target key areas, including the residential areas of Broadhalgh, Bagslate Moor and Sudden.

- 7.1.25** The proposals would not cause a complete or very large change in view and does not substantially alter the composition of the view and the visual amenity it offers. The mast is relatively narrow and the thin struts of the lattice tower filter light through reducing its bulk. The angle of view is not wide, instead it will minimise visual bulk and allows the structure to blend more effectively into its surroundings compared to solid or monopole alternatives.
- 7.1.26** The height restrictions were thoroughly explained throughout the site specific supplementary information. The proposed tower has a simple design which would not attract attention any greater than the existing masts. The bulky headframe that was previously proposed and refused (see appendix CTL 6) has been removed, in favour of less antennas to ensure they can be situated on the legs of the antennas. It would not obstruct any notable view, especially given the site is located within a sports ground and its presence would be softened by its light grey finish, unless the Council or the Inspector prefers for it to be painted another colour. As such it would appear as functional infrastructure. The lower section of the mast would be seen amongst similar vertical elements of the area while the top section would, for many times of the year, not stand out when seen against the colour of the sky.
- 7.1.27** Regardless of the above, the Inspector is asked to recognise that the height of the mast is determined taking into account the features of the surrounding land. It is totally unreasonable to expect the mast to be of a comparable height to buildings, lighting columns or trees. The mast is a functional piece of mobile phone infrastructure which, by its very nature, must protrude above clutter for the antennas to work effectively. In this case, the proposed development is required to meet the demand for improved coverage across a wider area and therefore must exceed the height of surrounding clutter in order to be technically and operationally fit for purpose. If the height of the mast is below the surrounding build form, this blocks the signal from the antennas and defeats the objective of reliable coverage as is the case in this proposal.
- 7.1.28** The proposed height of the mast at 20m is the absolute minimum to cover the target area with 5G technology, otherwise the installation would not work effectively. 5G technology uses high frequency which is more prone to signal blocking and does not travel as far as lower frequencies used for 2G/3G/4G services. Consequently, as part of 5G roll out, all four mobile phone operators need to pursue with much higher masts. To address the specific needs of 5G technology, the

NPPF was changed and the permitted development height limits were increased from the well-established 15m to 20m/25m for a ground based mast. The Government does not find the speed of 5G roll-out satisfactory and therefore proposes further relaxation of the permitted development limits to address this issue, especially as a great number of proposals are being refused. If it was possible to reduce the height of the mast at the appeal site, the appellants would have done so.

- 7.1.29** It is important to remember, this would be a prior approval application if the operator was not re-installing the flood light. There are no prior approval rights for the operator to install flood lights under their permitted development rights. Therefore, a full planning application was submitted to cover the installation of the tower and flood light under one application to ensure the Rugby Club does not lose a flood light, nor have to pay for a planning application of their own.
- 7.1.30** The delegated report considers the siting of the proposal *“is the closest possible siting to the properties across the whole of the rugby club”*. However, it was evidenced within the SSSI, in the discounted options section, this is not the case. There are other options to the east along Clubhouse Close which would be much closer to residential properties. The siting of a mast in a location along Clubhouse Close would have a greater impact on visual amenity and have an overbearing impact.
- 7.1.31** The proposed radio base station will not cause an overbearing, overshadowing or loss of privacy in the area. The site is situated near to residential properties, however these benefit from a separation distance of circa 30m away. The existing site is situated at exactly the same distance as the proposed tower. It will remain in line with the existing monopole but be better screened with trees to provide a screen for the lower half of the mast. Along with the other street furniture in the area that will help the mast to be visually absorbed into the setting.
- 7.1.32** The case officers delegated report considers the lattice tower would be *“clearly visible from the rear of the properties on Broadhalgh Avenue and properties located on Hands Lane, and located in the southern corner of the rugby club”*. Whilst the site would be visible from these properties, it would be no more at odds than what is already existing. There are already other telecommunication installations in the area which face the residential rears. While the mast will be visible from some rear elevations, its presence does not dominate the skyline or block significant views. The mast would be viewed in line with the rugby posts, flood lights and mature trees.
- 7.1.33** Below are attached photos of a mast siting in a similar sportsground setting with a similar design and height to the appellants proposal. The below example (Images 2-3) is located at Sidcup Sports Club, Crescent Farm, Sydney Road, Sidcup, DA14 6RA.



Image 2: Photo of lattice tower supporting antennas located at Sidcup Sports Ground



Image 3: Photo of lattice tower supporting antennas located at Sidcup Sports Ground

7.1.34 The degree of visual harm is limited to the rears of the properties, the site has been selected to be away from residential frontages, heritage assets and away from residential boundaries. These

types of structures are not unfamiliar to open, sportsground settings, the operator has followed a sequential approach to ensure the visual impact is minimised to far as practically possible. The area has established man-made, vertical features and will not look out of place.

7.1.35 The appeal site location has been chosen to support the NPPF. There is currently a hole in coverage for this operator as can be seen in the coverage plots (See Appendix CTL 2 for evidence). The proposed location will fill this hole in coverage and provide new 5G technology to the Bagslate Moor area. Cornerstone requires new 5G to be installed into its network in this cell area. The existing installations at Rochdale RUFC are not designed to be able to support three operators (VodafoneThree and VMO2's 5G antennas). If the operators were to upgrade the existing masts they would require a similar structure to the appeal site. Explained at paragraph 7.128, 5G new radio technologies operate in higher frequencies where attenuation of the radio signal is naturally higher, and the effects of clutter are greater. It will normally require a higher structure to achieve the same coverage footprint as older technologies.

7.1.36 The delegated report states the existing mature trees near the mast would *"not aid screening for the properties closest to the mast, and no tree protection order protects these trees from future removal"*. However, the site has been sited in accordance with the Code of Practice as explained at paragraphs 5.2.26 – 5.2.37. The Code of Practice clearly explains the antennas need to be elevated above the tree line in order to work. If the mast were to be any lower than the surrounding trees and urban clutter would block the signal, failing the operators design brief. The appellant rarely owns nearby trees, nor has legal jurisdiction over them but that is not what the Code of Practice is implying as a requirement, merely that they use the screening by nearby vegetation as much as possible to minimise the visual impact on the surrounding area, which is what they have done.

7.1.37 It is considered that the proposed location would be the most suitable siting within the search area. As previously demonstrated in section 3 of this appeal, the designated search area is constrained to the Rugby Club. To the south and east of the search area the lattice tower would be much closer to the residential properties and the conservation area. North of the search area would be further away from the target coverage area. Whilst the antennas can be orientated in certain directions, it still needs to provide 360 degree coverage. Anything on the north boundary of the search area would mean at least one sector would face away from the residential area the radio planner is aiming to target. Anything outside of the search area would leave a hole in coverage.

7.1.38 If the operator were to directly site a mast where they are targeting, then it would be much more visually intrusive than the chosen site. Many of the roads in the area accommodate housing on

both sides. As such, the siting of the proposed installation, away from the residential area and conservation area in Bagslate Moor, keeping in the area whereby the existing sites are located, was deemed to be the most suitable location.

- 7.1.39** Continuing through the delegated report, the case officer's opinion is there would be *"no screening that would soften the appearance of the lattice tower from approaching the club along Clubhouse Close"*. This is contrary to their earlier statement which notes there are mature trees in close proximity to the proposed mast. Despite this element of screening that is afforded in areas surrounding the mast, there is a separation distance between the mast and Clubhouse Close. See figure 9 below, there will be circa 90m from the edge of Clubhouse Close and the proposed mast.
- 7.1.40** Whilst the area is fairly open, the site benefits from being located as far away as possible from the residential properties as possible. To the north of the proposed location there is the Rugby Club clubhouse with its associated car park. Further north is Rochdale Golf Course, with multiple bands of trees around the course that would shield any long range views from this direction. To the east of the site is a rugby pitch associated with the rugby club, Clubhouse Close that leads to the aforementioned clubhouse and residential property rears for the houses along Hands Lane. Explained above, these properties all benefit from a clear separation distance to ensure there is no overshadowing or overbearing impact on their visual amenity. Views from further east, towards Oulder Hill Drive would be restricted due to the separation distance and the dense residential development that surrounds the area.
- 7.1.41** South of the site are mature trees that rise to some 10m in height with residential properties rears for properties along Broadhalgh Avenue. These properties have a ball stop fencing along their rear which stretches to the boundary of Clubhouse Close. Similar to the properties to along Hands Lane, these all benefit from a clear separation distance to ensure there is no overshadowing or overbearing impact on their visual amenity. Further south, along Broadhalgh Avenue is the boundary of Moorgate Avenue Conservation Area with dense residential properties and mature trees located within the majority of the Conservation Area. West of the site are mature trees that sit against the proposed appeal site, providing a backdrop for the lower half of the mast. Further west are rugby playing fields and other open fields. There are residential properties further west, however these are situated circa 320m away, along with the clear separation distance, there are intervening trees between their rears and the site location.



Figure 9: Distance between proposed mast and Clubhouse Close (source: Googlemaps.com)

7.1.42 Throughout the delegated report, the case officer has continually ignored the technical design constraints the operator is up against. Whilst it may differ from other existing structures in the area, it does not mean that the proposed design is unsuitable for this location. Such structures are a common feature within sportsgrounds and the siting of this proposal will ensure minimal impact on local residential amenity.

7.1.43 The case officer has failed to understand the design and height requirements for the operator to cover the area with new 5G coverage. The delegated report states:

'Detailed in the supporting statement is the justification that the lattice tower is the most suitable design to support the proposed structures from a technical standpoint, and should this be slimmer, the operating requirements would not be met. While this may be the case, the lattice tower is not considered an appropriate design in a residential environment such as the proposed site.'

7.1.44 The mast has been designed and sited in line with Policy JP-S1 of the PfE Joint Development Plan. However, this is a general design policy, as referred to above in paragraphs 4.3 – 4.16 the operator has design constraints that they have to work within. The design of the lattice tower is the slimmest and most appropriate design to incorporate in the area. The operator has re-

designed the tower from the previous refusal to minimise its visual appearance. The number of antennas and ancillary equipment has been reduced to negate requiring a bulky headframe at the top of the tower as per the previous application (see figure 10 below and appendix CTL 6 for a copy of the plans).

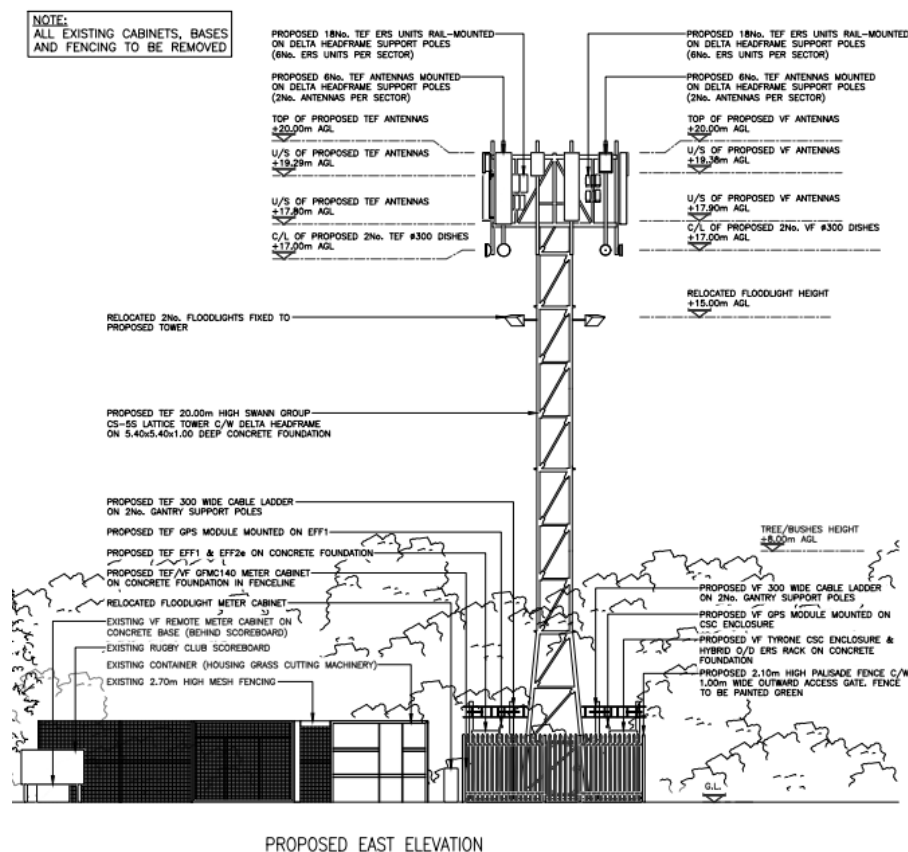


Figure 10: previous design refused under LPA ref: 22/01192/FUL / Appendix CTL 6

7.1.45 The Code of Practice acknowledges that the site selection and design of equipment is primarily dependent upon the coverage and capacity requirements and technical constraints of a specific location. Further it states that there should be a presumption in favour of facilitating sustainable network development, and that the operators and local authorities should work together to ensure connectivity needs are met. There was no engagement undertaken by the LPA to find a more favourable location. Instead the planning authority within the delegated report has suggested a site to the west. This has been discounted for a number of reasons (see paragraph 3.96). This was not suggested by the planning authority prior to the decision notice being issued, instead the authority did not engage with the appellant until the end of the application period whereby they informed the decision was to be refused (see Appendix CTL 21 for a copy of the email chain to the case officer).

7.1.46 The Code of Practice acknowledges that there are numerous factors that affect the type of

infrastructure that will be deployed, and that the planning authorities should be aware of these constraints, the Code at paragraph 29 and 68 it states:

‘There are factors that can affect the type of infrastructure that will be deployed (set out in more detail below in the section ‘Technical and Operational Considerations’), including location and the coverage and capacity requirements. Planning authorities should be aware of these constraints when considering proposals. In particular:

*‘In **rural areas**, base stations often need to cover wider geographic areas. Operators may need to use **tall masts or lattice towers to provide the required coverage**. The location of masts can sometimes be dictated by access to transmission links back to the operator’s main network and proximity to a power supply. Coverage in some areas can be limited because of the geography, topography and terrain’*

7.1.47 At paragraph 68:

‘Mobile base stations require a power supply to function. In urban areas this is rarely a problem, but it can sometimes be a challenge to find suitable connections in rural areas. Often it is not commercially feasible to install a new power source to a remote site and wayleaves with third party landowners can be required to deliver the power’.

7.1.48 The design is as simple and unfussy as possible, given its required height and that the mast has to be structurally capable of supporting 3 operators equipment. The proposed design in this location is as sensitive as it can be, taking into account technical and operational requirements. Therefore, the proposals fully comply with the requirement to minimise the environmental and visual impact on the surrounding area as far as technically and operationally possible, in line with the Code of Practice, Policy CF/6 of the Rochdale UDP, Policy DM1 of the Rochdale Core Strategy and Policy JP-C2 of the PfE Joint Development Plan.

7.1.49 There must also be consideration of the technical aspects that are dictating the siting and design – the existing coverage being provided in the area makes it difficult to position and design a base station that will provide meaningful service uplift. If it were to be sited in a location outside of the search area then the coverage footprint would be very small or have a greater impact on visual amenity due to the target coverage area being the residential areas. Considering the significant impact the infrastructure will have on delivering service to the surrounding area for 3 different operators, and the opportunities this brings not just for the local communities but visitors to the area, it is considered the localised impact is more than balanced out.

- 7.1.50** The proposal, being shared by 3 different operators, seeks to protect the landscape by providing new mobile broadband service via a single, shared site. Alternatively, to ever have this area serviced, it would need 3 operator independent masts, similar to what is in place at the moment but as individual 20m monopoles. This would be contrary to NPPF in terms of minimising site numbers and would lead to a significantly greater visual amenity impact than the shared proposal.
- 7.1.51** It is important to consider and note, the operators have permitted development rights to upgrade their existing masts up to 30m on non-designated land so long as they do not exceed two thirds of the existing width. Instead of utilising these permitted development rights, the operators have moved away from the rugby pitch and decided not to utilise their permitted development rights. They have accepted to utilise their permitted development rights would be contrary to Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), under Part 16, Schedule 2, Class A, would be contrary to Paragraph A.2 (1)(b) to ensure where operators utilise their permitted development rights, the *“visual impact of the development on the surrounding area is minimised, so far as practicable”*.
- 7.1.52** It is noted that Policy CF/6 of the Rochdale UDP supports sharing of masts. The proposal is directly in line with this policy. The sharing of one radio base station by three competing operators does not often occur. There are often too many differing requirements by each operator both from a technical and operational perspective and for confidentiality reasons, why this information cannot be shared between the operators. However, the demand on the network for all three operators is so great, they have decided to facilitate this growth with one installation. Thus, the sharing of this installation by 3 operators meets the aspirations of Policy CF/6 of the Rochdale UDP.
- 7.1.53** The courts have held that significant and demonstrable harm which outweighs any benefits is a high test. Paragraph 121 of the NPPF states that ‘local planning authorities should not impose a ban on new electronic communications development in certain areas...’ Effectively, the Council by refusing this application in this area due to its size, design and siting, have failed to consider that this is essential infrastructure as important as gas and electricity, which has technical and operational constraints as to why the site is designed in the way that it is and in this location.
- 7.1.54** Imposing a ban on telecommunications development is entirely inconsistent with the Framework. No major account has been taken of the operator’s technical constraints. No matter where the installations are located, they will have some visual presence. It is wholly unrealistic to consider otherwise. However, being visible does not automatically equate to harm. The operator

minimises the visual appearance of the installation as much as technically possible and reasonably practicable in line with the requirements of NPPF, Policy CF/6 of the Rochdale UDP, Policy DM1 of the Rochdale Core Strategy and Policy JP-C2 of the PfE Joint Development Plan.

7.1.55 There are strong technical reasons as to why the proposed site cannot be located elsewhere, as has already been explained earlier in this appeal statement. The discounted options are comprehensively set out in paragraphs 3.85-3.97 of this appeal statement. It indicates that the appeal site is the only suitable location in which to site the new replacement radio base station for the appellant within the tightly constrained search area as explained earlier in this appeal statement.

7.1.56 Inspectors at appeal have made clear comments on the exploration of alternative sites such as a telecommunications monopole and equipment cabinet on the footpath of Brewery Road at the junction of Piedmont Road, Plumstead, which was refused by the Royal Borough of Greenwich (PINS ref: APP/E5330/W/16/3159250 see Appendix CTL 22). The inspector considered the siting and appearance of the proposed installation on the character and appearance of the streetscene and the area and whether any harm caused would be outweighed by the need to site the installation in the location proposed. It is more the findings of the inspector that are important in this case rather than the specific proposals themselves.

7.1.57 The Inspector noted in paragraph 9 that 'Interested parties have raised concerns about... whether sufficient exploration of alternative sites has been undertaken....with regards to alternative sites, I have noted the appellant's submissions within the Supplementary Information, but I am mindful that even if alternative sites were available, **there is no requirement within the Framework... for developers to select the best feasible siting**' (emphasis added).

7.1.58 In another appeal decision on Totley Brook Road, Sheffield PINS ref: APP/J4423/W/17/3188962, for a 12.5m column and ancillary development, the Inspector considered alternative sites and third-party objections which stated that a full consideration of siting needed to be taken in to account. The inspector at para 16 (see Appendix CTL 23) stated in his report:

*'I have noted the appellant's submissions within the supplementary information as well as the contention of interested parties regarding the need for fuller consideration of siting. Nevertheless, I am mindful that even if alternative sites were available, **there is no requirement within the Framework or the GPDO for developers to select the best feasible siting...**'* (emphasis added).

7.1.59 The above Inspectors' decisions clearly acknowledge that there can be more than one location deemed as acceptable to provide a service but it also needs to be taken into account, they may

not work technically. The appeal proposals will enable three operators VodafoneThree and VMO2 to provide replacement 2G and 4G services, along with new 5G service provision to this area.

- 7.1.60** The delegated report compares the lattice tower to the surrounding build features and acknowledges the tower height can't be reduced:

"The proposed height would be substantially taller than any surrounding features, being taller than the tallest adjacent monopole, flood lighting column, street lighting column, and also have a much wider diameter and the lattice style would in appearance detract from the openness of the spacious grounds and would result in a cluttered appearance at odds with the existing character. It is acknowledged the height cannot be reduced for operational reasons, however this does not consequently mean this specific site is therefore suitable for a 20m high structure"

- 7.1.61** As mentioned previously the operator has various design constraints that limit the operators choice of design. Hence why there is a specific section in the NPPF covering high quality communications. It is believed that the technical constraints were not fully taken into consideration by the planning authority when determining the monopole at the proposed location. As referred to above in paragraphs 4.3 – 4.16 the operator has design constraints that they have to work within. The design of the lattice tower is most appropriate design to incorporate in the area. It allows light to pass through it without detrimentally affecting the visual amenity. A monopole would appear as a solid structure with a much bulkier appearance.

- 7.1.62** Policy JP-C2 of the PpE Joint Development Plan refers to digital connectivity, the area will support the provision of affordable, high quality, digital infrastructure. The lattice tower is in accordance with this policy. The site has been located to maximise coverage for the surrounding area, where there is currently no 5G coverage for the operator (See Appendix CTL 2 for coverage plots for evidence). The location has been chosen due to it being the only viable option within the search area to provide the required replacement coverage and new 5G coverage for 3 different operators. All three operators are targeting the residential area to the south and are locating onto one installation to allow for this to occur.

- 7.1.63** The application site will not be seen as overly incongruous within the immediate surroundings, as it would assimilate with other vertical elements of the street furniture in the vicinity, therefore, the proposed monopole will be in accordance with the Code of Practice and the NPPF as it will keep the visual impact to the minimum. As mentioned in the Code of Practice the siting of this type of development is predominantly dictated by the technical requirements (as set out in

Section 4 of this appeal statement), and it should be taken into consideration by the planning authority in decision making process; it is considered that the planning authority failed to take those aspects into consideration in its determination of the application now the subject of this appeal. The fact that the development will be visible in the area does not automatically result in unacceptable visual harm.

- 7.1.64** There are strong technical and planning reasons why the proposed radio base station cannot be located elsewhere. As already stated, this is a new tower for VMO2 and VodafoneThree to enable 5G to be brought into this area of the Bagslate Moor as demonstrated by the coverage plots enclosed at Appendix CTL 2. The existing installations at Rochdale RUFC are not designed to be able to support three operators (VodafoneThree and VMO2's 5G antennas). A replacement site is required for VMO2 and VodafoneThree to provide equivalent 2G service provision, enhanced 4G and new 5G technology in the cell area.
- 7.1.65** The proposed location subject of this appeal is the nearest clear position to the existing site at Rochdale RUFC for the operator where there is sufficient available and suitable land to accommodate the radio base station, no underground services which would block a build from taking place and sufficient distance away from the residential properties to allow for a separation distance. There are no suitable non-residential buildings or more suitable available land which would be able to support a radio base station or that wouldn't appear more prominent than the appeal site location within the operators search area. The discounted options and map highlighting the operators search area are more fully set out in paragraphs 3.83 – 3.96 of this appeal statement.
- 7.1.66** All three operators are constrained to a similar search area. All three operators are currently operating from this location, therefore they all need to provide equal coverage. The objective is to replace and enhance existing network coverage for three MNOs. This requires identifying a location that can provide equivalent or improved service coverage to the area currently served by the current shared existing site. Since each operator has specific technical and radio coverage requirements, the new site must be positioned within a defined geographical area where signal propagation can replicate or enhance the current service footprint. This significantly limits the flexibility in choosing alternative locations, as only a narrow zone can effectively meet the combined operational needs of all three networks.
- 7.1.67** As demonstrated by the submitted coverage plots, the surrounding area of this appeal site is currently not within the functioning network of 5G radio base stations for VMO2 and VodafoneThree customers and those VMNOs who buy network space from this operator. Subsequently there is no opportunity for individuals, private/public businesses or service

providers using the VMO2 or VodafoneThree network to maximise the potential benefits of 5G service provision in this particular area of Rochdale. As mentioned in the sequential approach to site selection, the siting of this type of telecommunications development is predominantly dictated by the technical requirements, and it should be taken into consideration by the planning authority in the decision-making process. Although the planning authority considered that the application, which is now the subject of this appeal, had justified the lack of suitable alternative sites, it is considered here that the planning authority failed to take the technical aspects into consideration when determining the application.

- 7.1.68** The Code of Practice acknowledges that the initial deployment of 5G will seek a search area which will be largely defined around the existing network and localised to cover a specific coverage gap. This often limits siting options and design solutions. This is the case in this instance. The operator has to provide contiguous 5G into an established network which is largely residential in nature. The search area is necessarily small to ensure that the coverage footprint of the existing radio base station is maintained and a loss of service provision is not experienced for existing users of the established network whilst providing 5G technology in this cell area.
- 7.1.69** The Code notes that all telecommunications installations are principally guided by the technical need for the site and the technical constraints. The siting and design of such installations must therefore be balanced between perceptions of visual impact and the proposed installations technical needs and constraints.
- 7.1.70** 2G and 4G signals by their very nature (as they carry high data rates) do not penetrate over long distances, just a few hundred metres, 5G even less so depending on the topography of the land, building clutter and vegetation including trees in the area which can reduce their effectiveness. Therefore, the new 5G radio base station needs to be close to their customer demand which in this case is the Bagslate Moor area.
- 7.1.71** The courts have held that significant and demonstrable harm which outweighs any benefits is a high test. Paragraph 121 of the NPPF (2024) states that '*local planning authorities should not impose a ban on new electronic communications development in certain areas...or insist on minimum distances between new electronic communication development and existing development*'. Effectively, the Council by refusing this application on the grounds that it will be too tall in the context of the surrounding area, have imposed a ban on telecommunications development in low rise areas. However, there is no national guidance which supports this view.
- 7.1.72** The appeal proposals will enable VMO2 and VodafoneThree to provide new 5G services for this densely populated area of the town in line with the Government's aspirations to be a world leader

in 5G, the next generation of wireless connectivity, and for communities to benefit from the investments in the new technology. The Government wants 5G to be provided now because stalling on 5G provision can have significant detrimental effects on the UK economy. The Centre for Social Policy in its report '*Upwardly Mobile: How the UK can gain the full benefits of the 5G revolution*' estimate the cost as much as £41 billion.

7.1.73 Alternative options have been considered (see section 3) and it is considered this is the best location from a siting perspective. The officers delegated report states "*The search presented is extremely limited and only includes the rugby club, and does not consider sites further away from residential properties; specifically no inclusion of land to the west. While the proposed site is heavily constrained between Rochdale rugby club, Rochdale golf club, Oulder Hill Academy and the residential properties to the south, aerial imagery shows parcels of open land to the west, which would have a greater distance away from residential properties than the identified sites that have been explored in this planning application*".

7.1.74 It was explained within the Site Specific Supplementary Information to why the site search area is constrained but the case officer has decided to ignore these constraints. This is a replacement of coverage for the existing site at Rochdale RUFC for VMO2 and VodafoneThree. The operators require a new site to be located nearby otherwise there would be a hole in coverage. This naturally makes the search area smaller as the operator is required to find replacement 2G and 4G coverage for the area. The area to the south is residential and a conservation area, this has further restricted the areas in which the operator can appropriately located a replacement mast.

7.1.75 The case officer has overlooked this in favour for a site that outside of the search area. Within their delegated report they state:

"Without prejudice to the outcome of a future planning application, the land to the west would likely be a more suitable site within the locality, with access along Regency Crescent and maintaining a significant distance away from key views and residential properties".

7.1.76 Despite multiple emails to the case officer for an update (see appendix CTL 21 for a copy of the full email chain to the case officer), this was never identified or suggested. If it was then it would've been discounted as per paragraph 3.96 / discount no. 12. If they had informed the appellant of their preference to the west, the appellant would've had the opportunity to discount the area to the west during the period of the application.

7.1.77 It is considered, the lattice tower has been carefully sited in a location whereby it sits at a similar distance away from the residential properties as the existing situation. The operator has re-

investigated the search area since the previous refusal and considered this the most suitable location from a technical and planning perspective. Being located on the fringe of the residential area to the south, it allows for coverage to be reached to the locale without impacting on residential amenity or being located within the Conservation Area. The site benefits from being situated against mature trees, located within a sportsground, will cover the residential areas to the south and be able to be built due to the existing access arrangements.

- 7.1.78** In regards to the type of the mast chosen for this location, it is considered, the lattice tower is the most suitable. These styles of masts are common within sports grounds. Whilst there is nothing directly comparable to the lattice style, there are other vertical features in the area. At the start of the case officers delegated report they consider:

“the area is uncluttered and has an open character and appearance with limited street furniture”.

- 7.1.79** Towards the end of their report, they describe the area to be on the contrary to the above statement:

“The removal of the existing monopole would not alleviate the impact of clutter within the area, as the proposal also includes the erection of a floodlighting column in its place, which would further demonstrate the excessive height of the proposed mast”.

- 7.1.80** The application is in accordance with the NPPF para 120 (2024) to reduce the number of masts. The proposal will allow for 3 different operators to remove their existing monopoles in the area and locate onto one tower, reducing proliferation of masts. Furthermore, the case officer themselves identifies there are other vertical elements in the area, contrary to their earlier statement of the area being “uncluttered”. There are other common pieces of sports ground furniture surrounding the site such as flood lights, rugby posts, ball stop netting, metal safety barriers, equipment cabinets and street lighting. As a result, the lattice tower will not appear alien within the surrounding context, instead it will fit in with this sportsground.

- 7.1.81** It has already been demonstrated in Section 4 of the appellant’s appeal statement that the proposed antenna height of 20m is essential to provide new 5G coverage and replacement 2G, and 4G service provision to the surrounding area. 5G radio signals are more sensitive to physical obstructions than older technologies. This is because the higher the frequency band the greater the reduction in signal strength, increasing the likelihood of dropped calls and reduced data rates for internet browsing, for example. Any physical object obstructing the propagation of radio signals causes a reduction in the signal strength reaching a customer’s device. A common term for these objects is ‘clutter’ such as buildings, trees and hills. Generally, the higher the signal

frequency the more it will be impacted by clutter.

- 7.1.82** Since 5G new radio technologies operate in higher frequencies where attenuation of the radio signal is naturally higher, and the effects of clutter are greater it will normally require a higher structure to achieve the same coverage footprint as older technologies. Furthermore, unlike traditional technologies 5G uses adaptive beamforming technologies to increase capacity and data speeds to the user. For effective beamforming the antenna will normally need to be mounted higher than conventional antennas. These factors all lead to the need for an increase in antenna height in 5G.
- 7.1.83** It is accepted that the height of the proposed installation is taller than other pieces of surrounding infrastructure and buildings, but this in itself is not a valid reason to conclude that it is not appropriate at a specific location. Telecommunications apparatus by its very nature must be taller than surrounding built and natural form to ensure its efficient operation. To suggest that it is inappropriate because it is taller than nearby flood lighting columns is no more relevant than suggesting that street lighting columns are inappropriate because they are taller than road signage or traffic lights. They are all essential pieces of infrastructure within a streetscene that carry out differing functions and therefore cannot be considered on the same merits. As such, the proposal should not be considered negatively due to it being taller per se than adjacent buildings and linear structures.
- 7.1.84** Reasonable consideration of the proposal in the context of a sports ground where these types of installations can be commonly found, can only conclude that the presence of other vertical structures in the immediate area only seeks to provide a setting wherein a base station may appear more congruous from which to provide an important service to a wider area.
- 7.1.85** There are technical and operational requirements of 3 operators all sharing one installation requires a robust lattice tower to be provided and that ideally, they should be shielded as much as possible. To this end, where this is possible, the sites are chosen where shielding is provided through vegetation and topography. The site has had its headframe reduced to allow for the antennas to be situated on the legs of the antennas. The number of antennas have been reduced, compromising on coverage and capacity in favour of a more suitable design to have the least impact on the surrounding area.
- 7.1.86** In line with NPPF, the Code of Practice and the Places for Everyone Joint Development Plan Policy JP-C2 operator has chosen the most sensitive design available to provide 5G to this area of Rochdale with the Bagslate Moor area. As a result, the antennas are located on the legs of the tower, to minimise its width and appearance in the area. The tower is proposed to be grey a

similar colour to other vertical structures nearby, although the tower can be finished in any other colour the inspector considers appropriate. If the antennas and tower were any slimmer, then the equipment would not be able to fit in the one installation and another radio base station would be required leading to the proliferation of masts contrary to NPPF and the Code of Practice. Section 4 describes in greater detail the technical reasons for the lattice tower design and appearance and thus will not be repeated again here.

- 7.1.87** Once the tower will be installed within the area it will not look incongruous in the streetscene and will assimilate with the surrounding area and in time becoming an established part of the area. As presented on in the photos below, this type of structure is becoming a common feature within sportsgrounds. They allow for coverage and capacity in rural locations without impacting on residential amenity. The location being on the fringe of the residential area allows for all 3 operators to provide coverage to this area without moving into the residential area or conservation area. As more people choose to work remotely which increases a demand on the coverage and capacity in residential areas.
- 7.1.88** As with the lighting columns and traffic lights in the wider area, the proposed tower is an essential item of infrastructure which has technical and operational reasons as to its design, exposed antennas and height which cannot be further amended. As already explained above the whole antenna has to be clear of any obstruction in order for these antennas to work effectively. If the mast were to be any lower, then the antennas would not be able to clear the urban clutter in the surrounding area. This would prevent them from working and an additional installation would still be required contrary to NPPF and The Code of Practice.
- 7.1.89** It has already been demonstrated in Section 4 of the appellant's appeal statement that the proposed antenna top height of 19.90m with an overall mast height of 20m is essential to provide new 5G coverage and replacement 2G and 4G service provision to the surrounding area. 5G radio signals are more sensitive to physical obstructions than older technologies. This is because the higher the frequency band the greater the reduction in signal strength, increasing the likelihood of dropped calls and reduced data rates for internet browsing, for example. Any physical object obstructing the propagation of radio signals causes a reduction in the signal strength reaching a customer's device. A common term for these objects is 'clutter' such as buildings, trees and hills. Generally, the higher the signal frequency the more it will be impacted by clutter, as explained in the revised Code of Practice.

- 7.1.90** The mast's hollow centre houses electrical cable feeders which connect the proposed ground-based equipment cabinet to the radio antennas, and other communications apparatus, which are secured at the top of the mast. The mast is the minimum height and width possible, consistent with the need to accommodate multiple-generation technologies for two mobile operators. The scale of the mast is partly informed by ensuring it is structurally stable when supporting the amount and weight of apparatus proposed.
- 7.1.91** The proposed palisade fencing, forming the site compound, would be mostly screened in views from the sundowning area. The galvanised finish fencing would sit well alongside the existing wire mesh fencing. The fencing is necessary in order to prevent people climbing the mast.
- 7.1.92** As explained Bagslate Moor area. Exposed antennas would provide optimal coverage to the target coverage area and enable 5G coverage to be provided to this cell area, in line with the Governments push for high quality, reliable, advanced, next generation connectivity throughout the UK. If the antennas were shielded 5G service provision would not be able to be provided and would fail the operators design brief to provide 5G in this area of the city.
- 7.1.93** The Planning and Compulsory Purchase Act states that each application should be determined in accordance with the development plan unless material considerations indicate otherwise. The operators 5G license legally requires high quality service provision to the vast majority of the UK. This is a key site for VMO2 and VodafoneThree considered necessary in order to meet their 5G license obligations in Rochdale. As a result, the appellant has submitted a number of applications to provide 5G all around the city so that the 5G network can link up to Rochdale, the Greater Manchester region and the rest of the UK via its programme to roll-out 5G nationally. Therefore, the appeal proposal is very significant in order to ensure that the national network is seamlessly linked from cell area to cell area, and that locations such as these in Rochdale get the connectivity, they require in order for the customer to be able to utilise their handsets for the purposes in which they were designed for.
- 7.1.94** Within the reason for refusal it requires further information on alternative site selection as *"In the absence of a comprehensive assessment of alternative sites for the proposed development it is not possible to definitively conclude that there are no more suitable sites reasonably available that would result in a lesser degree of visual harm."*
- 7.1.95** Section 3 demonstrates there are no other viable streetwork, greenfield or rooftop sites. The area to the south is residential with low rise buildings. Whilst monopoles are becoming common within built up areas, it was deemed in this instance to avoid the residential area and focus on providing coverage for 3 operators from one installation, compared to three different installations.

The rooftops in the area are not suitable to host telecommunications apparatus, they are low lying rooftops which are pitched. As explained in section 3, pitched rooftops cannot host telecommunications equipment as they are not structurally stable enough to hold the heavy equipment. Even if the rooftops were able to host the equipment, they would require long support poles to avoid clipping and reach their target coverage area. This would have a greater impact on the visual amenity than the appeal location as they would be seen from a wider area and located within the residential nature of the area.

7.1.96 A streetwork option would not be ideal from a visual perspective either as they are often located within built up locations due to the antenna orientation restrictions. They are not able to be shared due to the heavy weight of three operators equipment including the feeder cables that run up the centre of the pole. A streetwork pole would be located within the residential area, in turn this is a Conservation Area, in which Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 of the Act emphasises that special attention should be given to the desirability of preserving or enhancing the character and appearance of the relevant Conservation Area. In pursuing the identified site out-with this designation and avoiding so far as practicable the setting of listed buildings found therein, it is felt that on balance the site and proposal put forward is a more appropriate option to pursue rather than one within the Conservation Area.

7.1.97 A greenfield option outside of the search area would not work. A site further north would be restricted due to limited room within the car park that is used on match days and at least 2 car parking spaces would be taken up from the installation, there are underground services as evidenced by the numerous man hole covers and drainage cover which would block a build from commencing. Also, it would shift the coverage northwards away from the residential area, only two out of three sectors would provide coverage into the target area. This would lead to a poor user experience with dropped calls and buffering issues. This would be unacceptable to the operator and not viable. Therefore, it would not meet operator's technical requirements. Similarly, a site to the west whereby the planning authority have stated there is "*access along Regency Crescent*", this is not the case. From the west access would have to go through private driveways, these require third party wayleaves to allow for access that may not even be possible. From the east, Broadhalgh Avenue is a small through road with overhanging trees which would require significant lopping and crowning to allow for the large build vehicles to pass through. Given these are within Moorgate Conservation Area, therefore subject to a TPO, this would not be acceptable. Even if access was possible, it would be outside of the search area, which as explained already throughout this appeal statement of case, would not work.

7.1.98 Therefore, it has been demonstrated that this is the only viable location from a technical and

planning perspective, having the least degree of visual harm on the amenity in order to provide replacement 2G and 4G service provision and new 5G coverage. The profile of the headframe has been significantly reduced from the original proposal (see figure 10 and appendix CTL 6 for the previous design). The design of the mast is now the most minimal structure capable of meeting local network requirements, keeping at sufficient distance away from the residential properties. The proposal is sited at a similar separation distance to the existing monopoles from the residential properties and design in appropriate manor within the sportsground setting. It allows 3 different operators to share the one mast. This is all in line with the NPPF, Code of Practice, Policy CF/6 of the Rochdale UDP and Policy JP-C2 of the PFE Joint Development Plan.

Lack of Coverage – material consideration

- 7.1.99** The case officer, in assessing the siting and appearance has concluded that siting and an incongruous design of mast, the proposals are unacceptable and that the public benefit does not outweigh the identified harm. The case officer does acknowledge there are social and economic benefits but these would not be outweighed by the harm *“The requirement for enhancing electronic communication infrastructure and 'levelling up' digital connectivity must be balanced against the requirement for equipment to be sympathetically designed and camouflaged where appropriate. Having regard to all relevant considerations, including national planning policy and the potential availability of alternative sites, it is not considered that the benefits of the installation in terms of the enhancement of the telecommunications network, including its contribution to economic growth and the operational and locational needs of the operators outweigh the significant harm arising to the character and appearance of the area”*. It is clear the council have not fully considered the economic and social benefits of the proposal.
- 7.1.100** This is clear in the delegated report as they go on to state in their Article 35 statement that *“The proposal would not improve the economic social and environmental conditions of the area nor does it comply with the development plan and therefore does not comprise sustainable development.”* It would appear the Council appreciate the benefits of connectivity. If it were the case, the UK Government, the Greater Manchester Authority and Rochdale Council themselves would be wasting their time (and considerable public resources) in trying to ensure 5G connectivity is achieved across their respective jurisdictions, through their various digital strategies.
- 7.1.101** This has led the case officer to make their assessment in an unreasonable manner. All of the social and economic benefits were presented to them within the submitted Site Specific Supplementary Information document. They have either ignored the social and economic benefits or not aware of the Council's own digital strategy which makes clear the benefits of

being connected. As well as the other strategic documents that Rochdale (as part of Greater Manchester) has agreed to. The following paragraphs will further outline and highlight the strong economic and social benefits that the proposed site can bring to the Bagslate Moor area.

- 7.1.102** In accordance with the NPPF, the proposed installation is significant to enable continuous coverage of the telecommunication network, ensuring that the Bagslate Moor area continues to get the mobile coverage it needs for VMO2 customers as well as new 5G coverage. It will also maintain and improve coverage for the Mobile Virtual Network Operator's (MVNOs) which use the VMO2 network which includes GiffGaff, Tesco Mobile, Sky Mobile and VOXI, Asda Mobile, Lebara Mobile and Talkmobile on the VodafoneThree network. So the proposal will not only provide a service for three operators but those who buy network space off them, which is at least 3 with VMO2 and 4 with Vodafone. So, the proposal will not only provide a service for one operator but those who buy network space off them, which is at least 3 with VMO2 and 4 with VodafoneThree. This will provide a choice for those customers who consider the level of coverage in their area when selecting which operator they agree future contracts with.
- 7.1.103** The proposed installation would infill the current non-existent 5G mobile coverage for VMO2 and VodafoneThree in and around Bagslate Moor and as such is a vital link into the operator's network. Policy DM1 of the Rochdale Core Strategy seeks to ensure that there are no undue effects on residential amenity. A telecommunications installation is a piece of essential infrastructure to enable the mobile network to function.
- 7.1.104** This has been recently recognised by the Government within the UK Infrastructure Strategy (see Appendix CTL 24 for a copy of the relevant extracts). The Strategy identifies the need for high quality infrastructure, in turn it boosts growth and plays a vital role in delivering higher living standards. Investment in infrastructure will improve transport and digital connectivity, which supports productivity and efficiency improvements. It will also provide housing for the workers that productive firms need. Paragraph 3.38 of the Infrastructure Strategy provides a key insight to the benefits economically digital connectivity brings to areas and the economy:

"Digital infrastructure also increasingly underpins the provision of services critical for the functioning of society, business, and government – including the operation of other infrastructure sectors. In particular, demand for data centre services is projected to surge over the next decade including for AI development and deployment. The government is committed to facilitating the development and expansion of cutting-edge, secure, and sustainable digital infrastructure that meets the needs of both the private and public sectors"

- 7.1.105** Once installed it will not cause increased activity as the site will only need to be visited approximately once, maybe twice a year for servicing maintenance. The need to visit the site, once operational, will be very limited. Therefore, there will be no detrimental activity or disturbance to the amenity of nearby occupants.
- 7.1.106** A radio base station does not cause vibration, does not emit dust, fumes or produce litter, no lights are required for the radio base station operation and therefore it cannot cause light pollution. The mast itself will not emit any noise. The only noise will be from a fan within the equipment cabinets which will only be activated on very hot days. This noise will not be audible above background noise, and certainly not sufficient to warrant the proposals refusal.
- 7.1.107** This area of Rochdale currently has no 5G service provision for the operator, as shown in the enclosed coverage plots (see Appendix CTL 2). Therefore, it is a 5G 'not spot' for the operator, in a high demand, residential area. Consequently, this community does not have access to the latest high quality indoor 5G coverage and capacity. Thus, users of their 5G enabled handsets are unable to utilise their devices for the purposes in which they were purchased. This is contrary to the Government aspirations to be a world leader in 5G and Greater Manchester's aim to be a world-leading digital city region benefitting from top-level digital infrastructure (Greater Manchester Digital Blueprint) and being the 'smartest' city – one of the Greater Manchester Mayor's aspirations. The Places for Everyone reiterates the point it is the Greater Manchester ambition to be the UK's leading digital city and one of Europe's top five. In line with the operators 5G rollout programme, which is also aligned to the latest Government thinking for advanced, high quality and reliable communications infrastructure and Greater Manchester's aim to be at the forefront of 5G roll-out there is an urgent need to fill this hole in coverage.
- 7.1.108** The current proposals will facilitate the development of an advanced broadband telecommunications infrastructure in line with National Government guidance contained within the NPPF which supports infrastructure especially where growth takes place. It will also fully comply with policies JP-S1 and JP-C1 of Places for Everyone Joint Development Plan which supports development which improves and expands telecommunications coverage. By providing the latest 4G technology and new 5G service provision the proposals will also help meet the aspiration of the Greater Manchester Strategy to be a world-leading digital city region. Embracing digital technology throughout all sectors, geographies and occupations is fundamental to Greater Manchester's current and future international competitiveness according to the Greater Manchester Strategy. Becoming a leading digital city-region is imperative to delivering the Greater Manchester Strategy Vision of delivering the economic, social and inclusion improvements it needs and wants. Digital growth plays a fundamental role in driving

economic growth.

- 7.1.109** Providing the latest 4G technology and new 5G service provision in this area of the regional city will also be in line with the aspiration of the Greater Manchester Local Industrial Strategy to be one of the top 5 city-regions for the digital economy in Europe, with full fibre broadband and 5G coverage. It will also support the Greater Manchester Local Industrial Strategy aim to upgrade, integrate and future-proof its infrastructure to create a 21st century city-region with extreme digital connectivity, clean and inclusive growth and improved access to national and global markets. The proposals will also support the Greater Manchester Local Industrial Strategy of having world-class connectivity digitally with the infrastructure to digitalise all sectors. As a result, the Local Industrial Strategy fully supports the development of 5G networks.
- 7.1.110** Integrating 5G coverage for VMO2 and VodafoneThree within this area of Rochdale will help meet Key Strategic Enabler C of the Greater Manchester Digital Blueprint which seeks to extend its world class digital infrastructure ensuring that Greater Manchester has the digital infrastructure it needs to be a world class digital city region delivering ubiquitous 4G and 5G mobile across the whole city region by 2025.
- 7.1.111** Places for Everyone Joint Development Plan also strongly supports improving digital infrastructure with digital connections becoming increasingly important every aspect of our lives. As acknowledged in the Places for Everyone Joint Development to be able to be considered a true global city the area needs widespread, affordable, reliable, secure and future proofed digital infrastructure that provides competition for businesses and social inclusion. This can only be achieved through providing the digital infrastructure to the areas where it currently is non-existent.
- 7.1.112** New 5G coverage in this part of the city will also fully comply with the Greater Manchester Infrastructure Framework by helping to meet the challenge to provide pervasive, affordable, resilient digital connectivity. The Framework notes that if this challenge is to be met then early roll out of 5G especially in areas where mobile data use is congested is needed such as the Regional Centre. The proposed installation will fully meet this Framework aspiration. The proposals will also help Greater Manchester to be a smart and digitally ready city-region, where resilient fixed connectivity supported by 5G service provision is required. The Framework also states that 'anyone in Greater Manchester should be able to access resilient, seamless connectivity at a speed they need anywhere and anytime'. The proposed installation will fully comply with this aim.
- 7.1.113** In line with the Greater Manchester Infrastructure Framework which fully supports the

development of 5G, the proposals will provide world-class connections and access to opportunity for all in this cell area, as well as providing world-class digital infrastructure which provides the platform for Greater Manchester to embrace emerging technologies and societal changes. As noted in the Infrastructure Framework 5G infrastructure is fundamental to enable digital technologies to function. The proposals will ensure that any VMO2 and VodafoneThree customer or MVNO customer which buys network space of VMO2 or VodafoneThree in this cell area will be able to access resilient, seamless connectivity at a speed they need anywhere at any time. Without the more basic technology solutions such as 5G, the Framework acknowledges that smart-region solutions and value-added outcomes will struggle to be brought to fruition.

7.1.114 In line with the Greater Manchester objective to be one of the top 5 European Digital City-Regions recognised globally for its digital innovation, the proposed radio base station will connect positively to the community as a whole and provide connected digital communication infrastructure so that Rochdale can remain internationally competitive, sustain existing growth and attract new high value business. It will allow access to faster connection and enhanced data services, the benefits of which have been widely publicised, and which will be set out more fully later in this appeal statement. The key benefits include connecting with family, friends and colleagues at any time around the world. This benefit has never been more important, understood and relied upon than during the COVID-19 pandemic, that we all experienced and had to live through, when a reliable, high quality, advanced telecommunications system was often seen as a lifeline to our loved ones, friends, family and work colleagues, helping to improve our mental health and well-being and being able to work from home where possible. It also enables us to manage our personal information 24/7. A good quality communications system also allows us to be always entertained and informed with the latest news (which has been particularly important during the COVID-19 situation) and creating more productive and cost efficiencies for businesses.

7.1.115 5G will provide faster and more reliable connectivity leading to greater opportunities. It will increase network capacity, helping to end the frustrations of people unable to access the internet in crowded places. It is more secure than open access WIFI and enhances protection of customers from interception, impersonation and location tracking. It will allow hospital outpatient appointments and emergency consultations to be carried out remotely by video link. This is not only more convenient for patients, but they can also play back their appointment at a later date or share it securely with a family member or carer to help inform their care.

7.1.116 5G allows connected ambulances where paramedic crews at an incident could access specialist

advice while they are at the scene e.g. video conferencing with consultants or other clinical specialists. Live streaming of patient data from the ambulance en-route to the hospital would help inform the immediate care patients received on arrival. 5G allows live streaming of CCTV footage from public transport buses, enabling immediate action against anti-social behaviour. Intelligent cameras using artificial intelligence to ID incidents could provide the opportunity for far greater coverage than is possible at present.

7.1.117 5G will provide faster and more reliable connectivity leading to greater opportunities. We will experience new technologies that will help us become more efficient and save costs as an individual or business. Advanced healthcare facilities performing surgeries remotely will be made possible along with freeing up more GP time through better online facilities improving health and social care. It will allow the greater Internet of Things (IOT) transformation, with better connected devices, the IOT will enable us to control devices more independently, it will help councils and businesses deliver services more efficiently including transport and logistics with connected parcels and fleet tracking; environmental monitoring with sensors monitoring air quality and water pollution in real time; smart retailing; industrial applications, enabling business to improve productivity e.g. through predictive maintenance and real-time analytics.

7.1.118 A recent report by Cluttons report examines how the UK is currently falling behind in meeting its own targets for gigabit-capable broadband and standalone 5G across the country, with a recognition by MPs that the Government needs to be doing more, especially as the copper switch-off approaches. The report identifies ***the UK has fallen behind globally*** (emphasis added) and the roll-out of standalone 5G across the UK has been moving more slowly. Refusing this application has slowed down the roll-out of 5G for 3 different operators, contrary to Government and regional aspirations (see appendix CTL 25 for a copy of the relevant extracts of the report).

7.1.119 Mobiles can only work with a network of base stations in place where people want to use their mobile phones or other wireless devices. Without base stations, the mobile phones and other devices we rely on simply won't work.

7.1.120 Without this new radio base station, the operator's customers would experience increasing numbers of dropped calls and buffering unable to access the internet on their handheld devices. They would also not be able to access the 5G network, a demand which is increasing rapidly as customers update their handheld devices to ones that are 5G compatible, and one that Greater Manchester is embracing with its ambition to be a world leading digital city region and the 'smartest' city where early roll out 5G is encouraged to provide pervasive, affordable, resilient digital connectivity. If the 5G network is not available, then the customers' would not be able to

utilise these handheld devices for the purposes in which they were purchased. This would be contrary to the aspirations of Central Government which aspires to everyone having access to the superfast highway network wherever they are and being a world leader in 5G.

7.1.121 The proposed new radio base station is in full conformity with the Greater Manchester Infrastructure Framework, the Greater Manchester Local Industrial Strategy, the Greater Manchester Strategy 2025 – 2035 and the Places for Everyone Joint Development Plan whose ambitions for the city-region are to be a world-leading digital city-region to help capitalise on economic, social and inclusion improvements that the Greater Manchester region wants and needs, which aims to upgrade, integrate and future-proof its infrastructure, to create a 21st century city-region with extreme digital connectivity. It will help meet their aim of Greater Manchester becoming one of the best digitally connected city-regions in the UK, where development of the 5G network is fully supported. Yet the Council in determining the application did not fully take into consideration the importance of 5G and the benefits it would bring to the city and the Greater Manchester region in line with its strong aspirations to be the ‘smartest’ city and a top European Digital City-Region recognised globally for its digital innovation. Where high quality digital infrastructure to a standard experienced where Policy JP-C1 of the Places for Everyone states *‘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’*. It did not carry out a full balancing exercise weighing the clear and well publicised economic and social benefits of 5G and being able to link this latest technology to the national network and other 5G sites across the city against the perceived harm that the proposed development would cause to the immediate area. If it had then the outcome may have been very different.

7.1.122 The Places for Everyone Joint Development Plan at Paragraph 10.33 recognise’s the importance of the telecommunications industry to ensure the Greater Manchester meets their aim to become a top five digital city in Europe, *‘Improving digital infrastructure and ensuring that new development is connected to it is therefore a high priority. The development industry has a significant role in enabling this priority, as well as benefiting from’*. The plan also acknowledges the rapid changes which digital connectivity goes through and the adaptability the plan echoes this, *‘Recent decades have shown the speed with which digital technology evolves, with a new generation of mobile technology being introduced around every ten years. The digital infrastructure will therefore need to adapt and evolve throughout the Plan period’*.

7.1.123 The proposed installation will help improve the area’s economic prosperity, strengthen the urban economy’s by supporting local businesses to start, grow, adapt and diversify. This is in

accordance with three of the key objectives (6, 7 and 9) of the Places for Everyone Joint Development Plan to ensure the more sustainable movement of people through improvement of social infrastructure including digital. It will support a better environment for today and tomorrow by reducing the need to travel and in turn minimise carbon emissions, a key ambition of the NPPF, the Greater Manchester Strategy 2025 – 2035, the Infrastructure Framework, the Local Industrial Strategy and Places for Everyone Joint Development Plan. The radio base station will support the delivery of healthcare provision and accessibility by enabling people greater access to online services, NHS appointment reminders (every missed NHS appointment costs the NHS approximately £160 source: NHS), reminders to take medicines, make appointments etc. As well as assisting hospital outpatient appointments and emergency consultations carried out remotely via video link, connected ambulances, live streaming of CCTV footage etc. By enhancing the 4G service provision to the surrounding area and providing new 5G coverage into the operators' network, this would fully support the Greater Manchester Strategy 2025 – 2035, Local Industrial Strategy, Digital Blueprint, the Infrastructure Framework and Places for Everyone Joint Development Plan.

- 7.1.124** The way 5G works, it is closely connected with the Smart City agenda and will enable centralized control of lots of different street infrastructure owned or managed by councils, such as streetlights, water meters and bus stops. The Greater Manchester area is fully committed to being a smart city and being a world-leading digital city region, as highlighted in the Greater Manchester Strategy 2025 – 2035, Infrastructure Framework, Local Industrial Strategy and Places for Everyone Joint Development Plan. As such Rochdale needs the 21st century infrastructure to enable this objective to become a reality in this part of the regional city. A new installation at Rochdale RUFC, enabling 5G service provision to the Bagslate Moor area will ensure that this aspiration is fully met.
- 7.1.125** The Local Government Association's 'Councillor's Guide to Digital Connectivity' notes that a survey conducted by the Confederation of British Industry found that 81% of firms said that they see more reliable mobile connectivity as essential. Studies have also shown that mobile broadband is associated with positive impacts nationally, such as higher GDP and increased employment. The Guide also notes that digital connectivity has become part of the fabric of everyday life, as important to communities and businesses as a water, gas or electricity connection.
- 7.1.126** A recent report by MobileUK looks into the challenges faced by the industry in bringing about a step change in the sector's capacity for raising capital for significant infrastructure upgrades. The report found, for every pound invested by the operator it returns £5 GDP to the local economy

(see Appendix CTL 26 for a copy of the relevant extracts from the report). i.e. returning 5 x the value to the local area. The multiplier effect. We request, you do not look at the perceived impact on the residential amenity in isolation, the operator has a massive infrastructure investment in the Tameside area, which should not be understated in its impact on the local economy, Cornerstone is a key enabler to the local economy.

- 7.1.127** For every £1 invested in digitally upskilling someone equates to £10 back to the local economy. But if they then cannot access the latest technology it could well push them to leave the area taking their new found skills with them. This is a key aspect the Council failed to recognise. They have not considered their own digital strategy, which promotes digital infrastructure, to create digital skills and workforce. Without this installation, those living and working in the area will not reap the benefits of 5G.
- 7.1.128** Every time the planning officer refuses an application for telecoms it means the operator cannot invest their money in their infrastructure to deliver better connectivity to local residents and businesses and the multiplier effects are simply not received. i.e. no knock on benefits such as those outlined within the plethora of Greater Manchester strategies.
- 7.1.129** The Government fully supports high quality communications infrastructure, even more so with the advent of 5G. The NPPF continues to strongly support telecommunications connectivity and states at paragraph 119 that local planning authorities should support the expansion of electronic communications networks. It acknowledges that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being.
- 7.1.130** The demand for mobile data in the UK is increasing rapidly, and as households and businesses become increasingly reliant on mobile connectivity, the infrastructure must be in place to ensure supply does not become a constraint on future demand. The council's own policy documents recognise the importance of digital infrastructure which again is highlighted in the Places for Everyone Joint Development Plan that pushes for digital infrastructure serving all parts of the city is supported.
- 7.1.131** An installation in this location will fill the current lack of the latest high quality service provision and enable VMO2, VodafoneThree and the 7 MVNOs who buy network space off this operator to maintain access to their handheld devices wherever they are for the purposes in which they were purchased. This is fully in line with the Government's aspirations that everyone has access to the superfast communications network, the NPPF, the Greater Manchester Strategy 2025-2035, the Digital Blueprint, the Local Industrial Strategy, the Infrastructure Framework Strategy and Places for Everyone Joint Development Plan.

- 7.1.132** Access to the internet in whatever medium now impacts every facet of our lives but only benefits those who can access and use it. The benefits of internet connectivity are key for both residents and businesses alike and a new radio base station in this location providing the latest 4G and new 5G technologies will support Greater Manchester's aspirations to be a world-leading digital city-region and one which promotes the growth of the digital sector, increasing digital inclusion, so all people can access services, education and training.
- 7.1.133** In line with guidance contained within the NPPF and the Greater Manchester Strategy 2025 - 2035, Infrastructure Framework, Local Industrial Strategy and the Places for Everyone Joint Development Plan a new radio base station in this location will enable fast, reliable, secure internet accessibility wherever the user is located. It would fully meet the latest operators' coverage and capacity requirements for 4G and new 5G provision. This would be wholly in line with the Government's latest aspirations to strongly support advanced, high quality and reliable communications infrastructure, essential for economic growth and social well-being. Where the NPPF notes that decisions should support the expansion of electronic communications networks. An installation outside this search area, regardless of whether there are existing sites, would not allow the operators to provide their desired level of coverage and therefore would not adequately maintain and provide new coverage and capacity.
- 7.1.134** As part of the operators 4G licence obligations, many customers will benefit significantly from a vastly improved service provision in this locality. They will be able to gain access to the very latest technologies and connectivity, including 5G, to high-speed data services. The importance of which is fully highlighted in the Greater Manchester Strategy, Infrastructure Framework, Local Industrial Strategy and Places for Everyone Joint Development Plan. Indeed, these documents acknowledge that Digital technology has catalysed the interconnection of the global economy, with the internet enabling the free exchange of goods and services, providing consumers with greater choice and businesses with access to skills, resources and customers. An installation in this location will help Rochdale meet its ambition of being the Smartest city.
- 7.1.135** The Code of Practice acknowledges that upgrading and improving mobile networks will not be possible without the necessary infrastructure on which we rely. With increasing consumer demand and the Government's aspirations for high quality communications infrastructure it is ever more important to improve connectivity and capacity.
- 7.1.136** The Code of Practice acknowledges that there will be times when there is a need for a new radio base station, where sites have been lost, where areas have limited or no coverage and where coverage and capacity need to be enhanced. This application is one such example where there is a need to enhance 4G provision and provide new 5G services within this area.

- 7.1.137** In the Code of Practice it acknowledges ‘the pressure on networks to upgrade and improve networks through changes to existing sites and the development of new sites is constant. With the increasing consumer demand and the Government’s ambitious aspirations it is becoming more important to improve connectivity and capacity. This is due to the ever-increasing demand for data hungry applications to be available to a range of connected devices, such as smartphones and tablet computers. However, The Code notes that upgrading and improving mobile networks will not be possible without the necessary infrastructure on which they rely’. Therefore, there is a significant need to locate the equipment in this area.
- 7.1.138** We all need high quality communications. In the modern world, a huge amount of time is spent using communications services: for work, to stay in touch with family and friends and in order to go about our daily lives. Our ability to access and use reliable mobile and broadband connections has become fundamental to the way we live and work, and the ability of businesses of all sizes to thrive. The importance that the Government attaches to digital infrastructure was acknowledged during the COVID pandemic.
- 7.1.139** The UK Government designated the telecommunications sector as one of the critical sectors in new government regulations and legislation in response to dealing with the COVID-19 outbreak. Despite severe restrictions in other sectors, work to repair and maintain the telecommunications network was allowed to continue at that time. All four operators work hard to provide additional network capacity to allow people uninterrupted connection for whatever reason and whenever they need it. This includes allowing local planning authorities and the Planning Inspectorate to drive the planning process forward ensuring it continues to operate effectively to support economic recovery. Without upgrading the network providing the latest technologies, users would not be able to rely on a high-quality communications network when they need it most.
- 7.1.140** Being able to use e-mail, VoIP, video calls using hand held devices is becoming increasingly important for business and domestic use as the up take in smartphones increases. Without new 5G connection and providing the latest 4G service provision the Bagslate Moor area would fall behind the rest of Rochdale, Greater Manchester city-region and the UK where 5G is being rolled out and would not meet the growing demand for such services by businesses or domestic users alike or the Government’s aspirations that everyone has access to the information superhighway and that the UK is a world Leader in 5G.
- 7.1.141** The latest Online Nation 2024 report (published November 2024) found that for most people in the UK, being online is a major part of daily life. Being online allows people to connect with others, sometimes in ways they may not be able to do offline. Data shows how we benefit from a range of online services, from messaging and calling platforms to gaming platforms, online

news outlets and online shopping.

7.1.142 Paragraph 8 of the Code of Practice on Mobile Network Development in England (March 2022) states:

'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.'

7.1.143 The Government recognises the role of Planning in delivering the digital infrastructure that we need, in a sustainable and well-designed way, especially as households and businesses become increasingly reliant on mobile connectivity. Paragraph 13 of the Code continues to echo the NPPF guidance in strongly supporting high quality communications infrastructure, which is seen as essential for sustainable economic growth. More specifically that planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technologies (such as 5G) in order to support economic growth across the country.

7.1.144 The operator not only has a license requirement to provide a certain level of 4G coverage to the population the appellant is obliged to meet the growing consumer demand for 5G coverage, especially as more people are purchasing 5G enabled devices, in line with their license obligations and the operators competitive market driven "requirement" to provide a high-quality service. Customers expect to be able to access their portable hand-held devices wherever they are, whether that be indoors or outside. There is currently no 5G service provision that is provided by VMO2 or VodafoneThree in this cell area. This gap can only be filled by providing a new installation within this locality.

7.1.145 It is therefore imperative that the operator continues to invest in ensuring that the latest technologies are available on its network, so that customers are able to continue to use their handheld devices wherever they are, for whatever reason, for the purposes in which they were purchased.

Balancing Exercise - Economic and Social Benefits

7.1.146 This appeal statement will clearly demonstrate the strong economic, social and environmental well-being benefits for the area if the proposed telecommunications installation is allowed to be installed in this location.

7.1.147 The social and economic benefits of providing 5G coverage to an area which currently has no

such service provision is a significant material consideration which should be weighed against the perceived impact on the character and appearance of the streetscene, and the visual amenity of the area associated with an installation at this location. However, the council failed to carry out a full balancing exercise, preferring to refuse the application even though it is an item of essential infrastructure which has technical constraints on its siting and appearance. The proposed lattice tower has a functional appearance, typical of telecommunications equipment generally found within sports grounds, taking this into consideration the installation would not appear prominent in the area. The cabinets are the minimum required in order to service the antennas.

7.1.148 Being able to use smartphones and other mobile devices such as tablets whenever and wherever you are is essential for the community as a whole. Indeed, there are some users who rely solely on their mobile devices as their form of communication and do not have a land line.

7.1.149 NPPF clearly acknowledges the benefits of advanced, high quality and reliable communications infrastructure citing it as '*essential for economic growth and social well-being*'. It enables people to connect and interact with each other, either in person or electronically, to increase prosperity. It enables effective communication between people and businesses and provides a place for people to work and enjoy our natural and cultural assets. Poor infrastructure can be both a disincentive to investment and growth, and have a detrimental impact on quality of life, prosperity and the well-being of communities.

7.1.150 The NPPF strongly supports sustainable development, as does the Policy JP-S1 of the Places for Everyone Joint Development Plan which supports delivering a pattern of development that minimises both the need to travel and the distance travelled by unsustainable modes to jobs, housing and other key services. The case officer states in the delegated report that:

'The proposal would not improve the economic, social and environmental conditions of the area nor does it comply with the development plan and therefore does not comprise sustainable development.'

7.1.151 The appellant refutes the above statement that the proposal would not improve the economic, social and environmental conditions of the area and that it does not comprise sustainable development. The proposed scheme will enable significant improvements for private and business users and facilitate connectivity, innovation, efficiency and user security through a 5G network which currently does not exist in the locality. The proposal will contribute to the expansion of home working to assist in the reduction of travel requirements and thus the environmental quality of the locality. The proposal therefore constitutes sustainable development

which significantly outweighs the harm to local distinctiveness, which is limited, and complies with the development plan contrary to the delegated report as above.

7.1.152 Mobile communication plays a significant role in sustainable development, being able to access the internet via a mobile device allows people to access a wide range of central and local government services buy groceries, manage finances, apply for jobs/university, and carry out school projects, send emails, download applications, send and receive instant messages, participate in social media, streaming and downloading data to name just a few of the benefits of being able to use an internet enabled handheld device. It also allows people to work from home or on the move without needing to return to the office. Residents and businesses will enjoy better accessibility, assisting home-base working by improving the electronic means of communication and the roll-out of high-speed broadband helping to promote live-work development. This reduces travel time, carbon emissions and increases the speed in which information is processed/shared. The proposals therefore fully comply with NPPF and the Policy JP-S1 of the Places for Everyone Joint Development Plan to minimise the effects of climate change reducing the need to travel and therefore the carbon footprint. It will support a carbon-neutral Greater Manchester and be economically, environmentally and socially sustainable in line with the GM Infrastructure Framework and Policy JP-S1 of the Places for Everyone Joint Development Plan.

7.1.153 In such instances, as described above, the NPPF supports development that improves the economic, social and environmental conditions in the area. Enhancing 4G coverage and capacity in this area and providing new 5G services will fully meet this national policy objective. Continuing to transform the digital connectivity of the city-region to drive economic growth and innovation, working to meet national targets of full roll-out of 5G technology for most people by 2027 will comply with the ambitions of the Greater Manchester Local Industrial Strategy. These factors should have all been taken into account when determining the application. The delegated report, although mentioning the benefits that the application documents set out does not carry out a significant balancing exercise weighing the full social, economic and environmental benefits against the perceived harm. Indeed, it doesn't consider that there are any economic, social or environmental benefits to the area from the proposed scheme. This stance is at complete odds with both national and regional guidance.

7.1.154 The council have not fully considered the benefits the proposal will bring, otherwise they would have referenced all the aforementioned digital and industrial strategies within the policy section. They only provide brief sentences on there would be public benefits but do not explain how these have been taken into account.

- 7.1.155** Mobile connectivity is essential to the future success of the economy. The combined value of 4G and 5G mobile connectivity is estimated to add £18.5bn to the economy by 2026 (Councils and Connectivity Sept 2018). Mobile connectivity is essential to creating a better society. Digital inclusion can help people gain employment, become more financially secure and improve health and well-being, enabling communities to be more inclusive. Mobile connectivity is essential to fulfilling the potential of new technologies. Innovations such as artificial intelligence and connected cars will change how we work, spend our leisure time and run our public services. This is in full accordance with the Greater Manchester Infrastructure Framework which acknowledges the importance of 5G and states that *‘as our homes businesses and cities become more reliant on digital technology to function the robustness of these systems becomes even more critical’*.
- 7.1.156** Providing the latest digital infrastructure to enable improvements in digital technology empowers and enables residents to have the highest quality of life, supports the creation of high-quality jobs and achieves the maximum productivity levels. It will help Greater Manchester achieve its ambition of being a world-leading digital city and one which its businesses, public service providers and citizens are using digital technology by default and to the fullest to grow their businesses and improve productivity to access skills, training and employment opportunities to address global challenges that have a local impact such as ill health, social isolation, homelessness and pollution; to improve living standards and well-being; and to improve the quality and value for money of public services. However, the Council did not take this into account in the determination of this scheme.
- 7.1.157** The Cornerstone Local Authority Engagement Brochure September 2020 (see Appendix CTL 27), emphasises further the benefits of high quality mobile connectivity including: promoting economic growth by attracting investment from business, which creates jobs and regional prosperity in line with national and local economic strategies; helps local businesses to offer a broader range of services, boosting the local economy; helps local Councils to offer online services such as school admissions and local information for residents supports local companies by facilitating working from home, offers social benefits such as being able to connect with vulnerable family and friends (a life line during COVID 19 lockdown) or contact the emergency services 24/7, and helps local councils to offer online services such as paying council tax bills which provides a more efficient service to name but a few benefits.
- 7.1.158** The appeal site is located in a residential area which will include pupils of school age. The relationship between 5G and education is evolving at a massive rate with educators exploring the relevance of Virtual Reality (VR) technologies for education and training. Crucially, VR can

support remote learning, allowing students a presence in the classroom even when working elsewhere, such as during lockdown or when unable to attend school for health reasons.

7.1.159 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high-definition images and video), increased capacity and heightened security will also allow learning on the job, thanks to technologies such as Augmented Reality (AR) goggles, which can give engineers real-time instructions on how to fix a machine on a production line, for example.

7.1.160 Patients across the country are now becoming accustomed to relying on remote healthcare services such as NHS 111, virtual GP appointments, and ordering online deliveries of essential medical supplies.

7.1.161 5G will prove critical in providing the infrastructure required to deliver remote health services over the next decade. By design, 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high-definition images and video), increased capacity and heightened security are going to be fundamental in scaling the patient benefits of remote healthcare and keeping medical records secure and private. For instance, trials have shown that connecting ambulance crews to expert resources using 5G allows paramedics to work with doctors and conduct specialist procedures in real time whilst on the road.

7.1.162 There is a demand for mobile connectivity in areas where geography, logistics or economics – or a combination of all 3, make it difficult. Mobile network capacity needs to grow to meet the demand of mobile users, who are consuming ever increasing amounts of data.

7.1.163 Paragraph 39 of the revised NPPF states that:

'Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including...permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible'.

7.1.164 Providing improved 4G coverage and capacity and new 5G service provision in this area will fully meet paragraph 39 of the NPPF, and the Greater Manchester Strategy 2025 - 2035, Infrastructure Framework, Local Industrial Strategy and Places for Everyone Joint Development Plan which aspires Greater Manchester to be a world-leading digital city-region, and Manchester to be the Smartest City. These strategies, the Framework and Places for Everyone Joint Development Plan also support strengthening digital and data infrastructure (including 5G) and

using data to help address challenges. However, there is little evidence that the strong support that Rochdale Metropolitan Borough Council and the Greater Manchester City Region have for the immediate roll out of 5G was fully taken into consideration in the determination of this application. If it had then the decision may well have been different.

7.1.165 It would appear that the Council chose to ignore these key elements of national and local planning policy and the plethora of Greater Manchester Regional documents published specifically to emphasise the need to bring 5G into the area at pace, even though this was highlighted in the Supplementary Information Statement submitted with the application. They did not carry out a full balancing exercise weighing the social and economic benefits of the proposal against the perceived harm to the visual amenity. They dismissed the technical constraints of the operator and the reasons for not being able to site the installation in alternative locations too easily. It is too simplistic to state that *'In conclusion, it is considered that the proposed installation would have a significant and detrimental visual impact and by virtue of this would fail to satisfy Policies P1, P3 and DM1 of the Rochdale CS, Policy JP-P1 and JP-C2 of the Places for Everyone JDP, and the NPPF'*. It has been demonstrated both at application stage and in this appeal statement that there are technical restraints that dictate the height and siting of telecommunication infrastructure, and that there are no more suitable locations within the search area that would be able to host the proposed monopole.

7.1.166 Technical constraints can impact the operators ability to site a mast elsewhere, so whilst it may be more visually better, if it does not work technically then it is not a viable option. This was acknowledged by a planning inspector recently, see paragraph 3.79 and appendix CTL 9 for a copy of the decision and plans. However, the council have decided to ignore these technical constraints, the social and economic benefits of the proposed appeal location.

7.1.167 The social and economic benefits are a significant material consideration which should be weighed against the visual impact associated with a radio base station in this location. HM Treasury outlined such benefits in its report *'Fixing the Foundations: Creating a More Prosperous Nation'* – July 2015. Paragraph 7.1 of the plan stated that reliable and high quality fixed and mobile broadband connections support growth in productivity, efficiency and labour force participation across the whole economy. They enable new and more efficient business processes, access to new markets and support flexible working and working from home.

7.1.168 Paragraph 7.2 goes on to highlight strong support for high quality communications infrastructure. It states:

'by reducing red tape and barriers to investment, the Government will support the

market to deliver the internationally competitive fixed and mobile digital communications infrastructure the UK's businesses need to thrive and grow, and which will enable the UK to remain at the forefront of the digital economy. The Government is working with business so that the market can play the lead role in delivering against the ambitions set out in the Digital Communications Infrastructure Strategy, published March, of near universal 4G and ultrafast broadband coverage'.

7.1.169 Indeed, MPs have noted in parliament that the UK's Superfast Broadband connectivity was 'relatively poor' and businesses were losing out from patchy coverage.

7.1.170 The Government recognises that widespread coverage of mobile connectivity is essential for people and businesses. People expect to be connected where they live, work, visit and travel. That is why the Government is committed to extending mobile geographical coverage further across the UK, with continuous mobile connectivity provided to all major roads and to being a world leader in 5G. This will allow everyone in the country to benefit from the economic advantages of widespread mobile coverage. As well as improved mobile signal, 5G networks are also crucial to drive productivity and growth across the sectors that local areas are focusing on through their emerging Local Industrial Strategies which is also acknowledged in the published Greater Manchester Local Industrial Strategy. Enabling and planning for 5G implementation is central to achieving the Government's objective to deliver prosperity at the local level and enable all places to share in the proceeds of growth.

7.1.171 This will allow everyone in the country to benefit from the economic advantages of widespread mobile coverage. As well as improved mobile signal, 5G networks are also crucial to drive productivity and growth across the sectors that local areas are focusing on through their emerging Local Industrial Strategies which is also acknowledged in the published Greater Manchester Local Industrial Strategy. Enabling and planning for 5G implementation is central to achieving the Government's objective to deliver prosperity at the local level and enable all places to share in the proceeds of growth.

7.1.172 The Government is determined to ensure the UK receives the coverage and connectivity it needs. To this end, the Government wants to be a world leader in 5G, the next generation of wireless connectivity, and for communities to benefit from the investments in the new technology. The GM aspirations align with the Government objectives of being a world leader in 5G. The proposed upgrade will fully support these national and local aspirations.

7.1.173 The case for 5G is compelling as it will bring faster, more responsive and reliable connections than ever before. More than any previous generation of mobile networks, 5G has the potential

to improve the way people live, work and travel, and to deliver significant benefits to the economy and industry through the ability to connect more devices to the Internet at the same time, creating the so-called “Internet of Things”. This will enable communities to manage traffic flow and control energy usage, monitor patient health remotely, and increase productivity for business, all through the real-time management of data. This is in full accordance with the Wireless Infrastructure Strategy that notes 5G can be a critical enabling technology. It can help increase productivity and efficiency by driving autonomous machines, enabling asset tracking and predictive maintenance and increasing the lifespan of machinery. In the public sector, 5G can support remote healthcare monitoring and smart city applications.

7.1.174 The Local Government Association (LGA) has produced a Councillor’s Guide to Digital Connectivity and sets out some of the benefits of 5G technology (see Appendix CTL 28):

- Faster mobile broadband and a more consistent experience in congested areas with a very high number of devices.
- Industrial applications, enabling businesses to improve their productivity, for example through predictive maintenance and real-time analytics.
- Internet of Things (IoT) services, many of which will help council’s and businesses deliver services more efficiently including:
 - Transport and logistics: connected parcels and fleet tracking.
 - Health and social care.
 - Environmental monitoring: sensors monitoring air quality and water pollution in real-time.
 - Smart agriculture and smart animal farming, smart retailing.
 - Connected and autonomous cars: allowing cars to communicate with each other, other road users and even the road infrastructure.

7.1.175 A National Needs Assessment – A Vision for UK Infrastructure has been published in October 2016). It sets out the infrastructure needs for the UK which includes the importance of digital technology. An extract of this assessment can be found at Appendix CTL 29 which states that:

‘A lack of digital connectivity has a detrimental effect on business operations, productivity and output and hence competitiveness in the global market place. Securing digital connectivity is thus critical to the UK’s long-term prosperity. A key challenge for

the digital sector is a persistent digital divide between those who have access to the latest technologies and those who do not, with resulting social and economic exclusion, particularly as dependence on e-services and digital communications increases' (page 66 A National Needs Assessment).

- 7.1.176** The Assessment goes on to note that 'Universal digital connectivity would serve as an equaliser of economic opportunity in that it enables participation in a modern digital economy'. Therefore, this Needs Assessment further explains the consequences of a lack of coverage and the effects this has on social and economic prosperity. This clearly highlights the importance of providing new 5G coverage to Bagslate Moor, where the economic benefits will outweigh the environmental considerations.
- 7.1.177** The Government's continued strong support for connectivity is further evidenced by the DCMS who launched their UK wide Digital Connectivity Portal on 20 December 2018. The Digital connectivity portal provides guidance for local authorities and network providers on improving connectivity in local areas. The Government wants everyone in the UK to benefit from world-class connectivity no matter where they live, work or travel. The Future Telecommunications Infrastructure Review outlines a package of measures to create the right market and policy conditions to deliver world-class connectivity for citizens and businesses. As a result, the pressure to provide a new radio base station in this densely populated area of Rochdale with national road infrastructure crossing through it to provide improved 4G and new 5G is significant.
- 7.1.178** The environmental considerations of the proposed development should be considered in light of the strong economic and social benefits of providing high quality indoor 4G service provision and new 5G coverage to residents, businesses, and visitors alike to the Bagslate Moor area. It is therefore vitally important that the whole of Rochdale has the necessary infrastructure to support the important role of the city, locally, regionally and nationally.
- 7.1.179** On the 29 November 2024, the Minister of State for Data Protection and Telecommunications, Sir Chris Bryant wrote a letter to Council Leaders and Council Chief Executives expressing his support for digital infrastructure in their area (see Appendix CTL 30 for a copy of this letter):

"Fast and reliable digital connectivity is increasingly important to our way of life. As people increasingly rely on their devices to work, learn and stay connected with each other, demand for greater speeds and more reliable connectivity is growing. Better digital connectivity is also key to delivering faster economic growth and increasing social inclusion.

The Government is committed to supporting the delivery of next-generation connectivity to communities across the UK by driving towards nationwide gigabit broadband and 5G coverage by 2030...

... While I understand how frustrating repeated street works can be, they are vital for improving both fixed-line and mobile connectivity...

*...Whilst we recognise the need to fully scrutinise planning applications, I ask for you to **support the deployment of this infrastructure wherever possible (emphasis added).***"

7.1.180 This letter by Sir Chris Bryant highlights the importance that Government places on 5G and advanced, reliable, high quality 5G technology. To prevent this technology from being brought into the area would be contrary to the Government's key aims and the Council's own aspirations in the Places for Everyone Joint Development Plan, relating to digital infrastructure which includes improving access for all residents and business to high quality digital infrastructure, enabling them to fully participate in the world and future proofing the city for the benefit of future generations. It acknowledges that the competitiveness of cities will be heavily influenced by the quality and capacity of their digital infrastructure such as the latest generation of mobile phone and wireless technology. Furthermore, access to high quality digital infrastructure, will be an initial component of social inclusion, enabling everyone to take up employment, education and social opportunities as well as accessing the full range of services that are increasingly provided on line. It will also enable greater homeworking and hence reduce pressures on transport systems. These aspirations cannot be brought to fruition without the infrastructure to enable Tameside to be part of a leading world-class Digital City region. Furthermore, without this installation, these ambitions cannot be fully realised, and this important part of the city will fall behind the rest of Tameside where 5G installations have been allowed as well as the UK as 5G rolls out across the nation.

7.1.181 On the 1 October 2020, as part of the Speed up Britain Campaign, The Centre of Policy Studies Report published '*Upwardly Mobile: How the UK can gain the full benefits of the 5G revolution*'. The report identifies what the 5G opportunities are and what the Government needs to do so we can all benefit from this vital new technology. It states that delays to the rollout of 5G could cost the country tens of billions of pounds in lost economic output. The former Government advisers Alex Jackman and Nick King argue that Government's 'levelling up' agenda and the UK's recovery from the COVID-19 pandemic is at risk without a faster 5G rollout – to the tune of £41 billion.

- 7.1.182** The report highlights that if delays continue at their current rate, by 2027, over 11 million households and businesses could be missing out on vital digital connectivity. Improving digital infrastructure supports the Government's 'levelling up' agenda, by helping local areas to retain and attract businesses and talent as well as by reducing regional inequalities.
- 7.1.183** The report states that 'the UK must have a functioning network to now support the recovery from the pandemic, empowering businesses and communities with wider coverage, and preparing the ground for the services that 5G can provide'.
- 7.1.184** Using analysis by the independent consultancy Policy Points, the report estimates that if 5G coverage reaches a quarter more of the population than the Government's current target of 51%, it will produce GDP gains of £41.7 billion by 2027. It highlights that the difference between the UK being a leader and a laggard in 5G adoption could be as much as £173 billion in incremental GDP over the coming decade, as estimated by the Future Communications Challenge Group.
- 7.1.185** The manufacturing, construction and agricultural sectors have been hit particularly hard by the pandemic, and these would benefit significantly from improved connectivity. However, onerous planning rules and loopholes in existing legislation are slowing down the infrastructure upgrades needed to make the most of this mobile revolution in these much-needed industries.
- 7.1.186** The report states that 'Digital networks and services have underpinned our resilience to the COVID-19 pandemic and they will drive our recovery. By expanding them, we deliver not only immediate benefits but also the essential foundation stone for future prosperity. This is no time for the Government to be passive – the difference between the UK as a 5G pioneer and ceding leadership to others is as much as £173bn'.
- 7.1.187** The report highlights that while 5G promises to create economic benefits through increased capacity, reliability and speed – vastly improving business productivity and removing barriers imposed by poor digital connectivity – the system is plagued by red tape.
- 7.1.188** The report acknowledges that 'the gains are not just at national level. A more extensive digital infrastructure helps local areas to attract and retain businesses and talent, thereby playing a vital role in reducing regional inequalities. Providing a supportive environment for digital infrastructure is one of the few things the Government can do that costs little, boosts growth and helps level up the UK....**the key is speed. The faster a network is built, the bigger the regional gains** (emphasis added). The telecommunications industry faces challenges on this front... The COVID-19 pandemic has increased demand on networks but delayed the availability of new spectrum to provide additional capacity'.

- 7.1.189** The report notes that ‘the reliability and reach of 4G is more important than ever. It is needed both to quench immediate demand...and also to facilitate future 5G rollout, as the underlying passive infrastructure will initially support both technologies...Every failure to provide better coverage not only presents an immediate opportunity loss for local business and consumers but also has a bigger downstream economic impact. It acknowledges that productivity gains to business, equality gains for regions and economic gains for the country are only as achievable as the networks they can access.
- 7.1.190** The report recommended that the Government should reform the strategic planning framework to compel local authorities to ensure that the needs of future mobile connectivity are adequately addressed in Local Plans and that new developments are assessed on how they might impact, or could support, local connectivity.
- 7.1.191** The proposed installation in this location will allow the operator to provide improved high quality 4G coverage and capacity and new 5G service provision supporting the Government’s aim of ‘*focusing on ensuring that everyone is connected to the information superhighway*’. This fully meets the aspirations of the NPPF, and the Greater Manchester Strategy 2025 - 2035, the Digital Blueprint, Industrial Strategy, Infrastructure Framework and Places for Everyone Joint Development Plan.
- 7.1.192** An installation in this location will ensure that the expansion of the electronic communications network is facilitated, and that high quality communications infrastructure is provided to the immediate area. This is in full accordance with the operator’s 4G license obligations and the Greater Manchester aims and aspirations to be a smart city region and have high quality 5G infrastructure, promoting and growing the digital sector and increasing digital inclusion.
- 7.1.193** It has been demonstrated that the proposed tower will not appear out of place in this location. The proposed equipment cabinets are common place in this location already and are vital essential infrastructure. The appeal site is no exception to this. There are other, non-telecommunications, statutory undertakers’ equipment cabinets who are providing an essential service to this area. The appellant aims to do the same, providing this high-capacity demand area with the latest 4G and 5G service provision it needs. If the appellant did not require this site, it would not be wasting time and money progressing this appeal. Simply put, it would not make financial sense.
- 7.1.194** The proposed installation would also enhance and provide new community facilities, positively contributing to the quality of local community life, meet the economic and social needs of the people who live and work in the area, provide balanced communities with appropriate services

and facilities and conserve the character of the area. Therefore, the appeal proposals fully accord with NPPF and The Code of Practice.

7.1.195 There are no grounds for withholding prior approval for the installation of a telecommunications installation at this location. Furthermore, after detailed consideration of the target service area and other potential sites it is clear that this is the best viable and most sensitive siting and design from which to provide this vital service to local residents, businesses, visitors and those travelling through the area. There are strong economic and social benefits attached to the service and connectivity the proposed scheme will provide and these significant benefits will outweigh any minimal perceived harm to the amenity of the surrounding area.

8.0 CONCLUSIONS

8.1.1 Having had regard to all the evidence in relation to this matter the following conclusions have been reached:

- i) The site has been carefully located against the backdrop of a mature trees, away from residential properties, heritage assets. It remains in a similar location to the other monopole's within the sports ground to ensures that the views of this mast from the wider area are minimised as far as possible.
- ii) The appeal proposals have been sympathetically designed so as not to look incongruous in the area and will resemble similar structures commonly found in sportsgrounds. As such, the proposed scheme would integrate well with the existing vertical structures within the immediate locale. The installation will allow for 3 out of the 4 main operators to share one installation.
- iii) Once the proposal is in place and operating, the existing VMO2 and VodafoneThree site will be removed and ground made good.
- iv) The height of the proposed mast is the lowest it can be in order to clear the trees and avoid the antennas signal being blocked to provide the necessary coverage to target coverage area.
- v) The installation would not result in a dominant structure incongruous with its surroundings and would not cause detrimental harm to the visual amenity of the area. The presence of other similar linear structures including the flood lights, rugby goal posts and other lease operators monopoles, provides a context in which the appeal proposals can assimilate with rather than appearing out of place to the detriment of the character and appearance of the area.
- vi) It has also been demonstrated that a new radio base station in this location would fill a significant hole in 5G coverage for the existing residents, businesses and visitors to the Bagslate Moor area. Without this installation, this area will remain without 5G coverage for 17 MNOs/MVNOs which accounts for some 75% of all mobile users.
- vii) The perceived harm to the character and appearance of the area is outweighed by the need for high quality, reliable, advanced telecommunications provision, as advocated by the Government in their recent Infrastructure Strategy and the Greater Manchester region within their latest Greater Manchester Strategy 2025 - 2035.
- viii) The benefits of enhancing and providing new community facilities that a high quality indoor new 5G communications network and improved 4G service provision would bring to the Bagslate Moor area have been demonstrated. It has been shown that such provision is

essential for sustainable economic growth and plays a vital role in enhancing the provision of local community facilities and services and has significant environmental benefits reducing the need to travel in line with paragraphs 8 and 39 of the NPPF.

- ix) Access to the latest superfast mobile technology in the form of 5G coverage is a strong material consideration in the determination of this proposed telecommunications installation.
- x) It has also been demonstrated that a new radio base station in this location would fill a significant hole in 5G coverage for the existing residents, businesses, visitors and users of the national road network in this area of Rochdale. The demand on the network has become greater with the large number of dwellings in the area to the south. Otherwise, the deficiencies on the network will prevent anyone using their 5G enabled mobile devices for the purposes in which they were purchased. Without this installation, this area of the borough will fall behind the rest of Rochdale where 5G installations have been allowed and the rest of the UK where 5G rollout is continuing at pace, in terms of being able to provide improved broadband services for consumers via public networks and where future 5G networks could provide specialist services to organisations and businesses.
- xi) The appellant is proposing to provide new, latest 5G technology for VMO2 and VodafoneThree. This fully meets the requirements of the NPPF, the Code of Practice, the Greater Manchester Strategy 2025 - 2035, the Digital Blueprint, the Local Industrial Strategy, the Industrial Framework and Places for Everyone Joint Development Plan to provide high quality digital infrastructure, being at the forefront of 5G rollout and a top 5 European Digital City Region linking up this part of the city to the national network. A break in the network will prevent a seamless connection between cell area to cell area leading to dropped calls and buffering. The benefits are therefore strong material considerations which outweigh any perceived harm to the character and appearance of the streetscene.
- xii) Providing a 5G network in this part of the city will help ready this urban part of Rochdale for further technological innovation in the mobile and broadband sector so it can adapt to future change while helping to ensure that all parts of Rochdale have access to modern communication systems. This is in full accordance with the NPPF, the Greater Manchester Strategy, the Digital Blueprint, the Local Industrial Strategy, the Industrial Framework and the new Places for Everyone Joint Development Plan.
- xiii) It has been demonstrated that the proposed 20m structure is the lowest possible that will allow the appellant to obtain its required new indoor 5G coverage and improved 4G service provision to the Bagslate Moor area. At lower heights the 5G antennas would be blocked by the urban

clutter in the immediate area and their requirement to be taller due to higher attenuation of the radio signal.

- xiv) There are no more sequentially preferable, suitable sites that would provide the required new 5G service and replacement 2G/4G coverage which would cause less harm than the appeal scheme. Inspectors have concluded that *'even if alternative sites were available, there is no requirement within the Framework or the GPDO for developers to select the best feasible siting'*; and
- xv) It has been demonstrated that the installation of the new telecommunications radio base station in this location will help to secure urgently required new 5G coverage and enhanced 4G service provision within the local area and would be significantly important for the operator's network. This is a very important site for VMO2 and VodafoneThree as it currently has no 5G service provision throughout the area. Furthermore, this site is one of the key sites for VMO2 and VodafoneThree in order to meet its legal license obligations to provide high quality 5G service provision to the Bagslate Moor area. As such, it will allow the operator to enhance and expand the electronics network carrying significant economic benefits, including facilitating home working (which in turn has its environmental benefits through reducing the need to travel, and facilitating home working), social inclusion, greater connectivity for businesses to their suppliers, customers, operating systems etc. to name just a few of the benefits. This is in full accordance with NPPF and underpins economic competitiveness and opportunities for households and businesses to achieve more socially and environmentally desirable ways of living and working in line with the Places for Everyone Joint Development Plan.

8.1.2 In the light of the foregoing, it is asked that this appeal be allowed and permission be given. It has been demonstrated that the appeal proposals accord with national guidance and the Council's development plan. It is considered that there are no other material considerations of sufficient weight that indicate the appeal should not be allowed.

8.1.3 In making its decision the Council has taken little consideration of the operator's technical constraints. No matter where the installations are located, they will have some visual presence. It is wholly unrealistic to consider otherwise. However, being visible does not automatically equate to harm. The operator has minimised the visual appearance of the installation as much as technically possible and reasonably practicable in line with the requirements of NPPF. The necessary associated equipment cabinets are also the smallest number possible and the minimum in height.

- 8.1.4** In making its decision the Council attached no weight upon the significant material social and economic benefits the proposal would provide; the Council's Digital Strategy for the city to be connected and which supports modern fit-for-purposes technology being used to ensure efficiency and which seeks to make the most of emerging technologies; or the strong Government support for such infrastructure proposals.
- 8.1.5** This appeal statement has addressed all the relevant policies of the statutory development plan and national guidance and shown the appeal proposals accord with the relevant policies and guidance. It is considered that there are no other material considerations of sufficient weight that indicate the appeal should not be allowed.
- 8.1.6** It has also been shown that the proposed development will cause no detrimental harm to interests of acknowledged importance.
- 8.1.7** For the above reasons, it is respectfully requested that the Council's decision is overturned, and the appeal be allowed.

Appendices