

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Doctor Fold Lane	Site Address:	Doctor Fold Lane, Heywood, Oldham, OL10 2QE
National Grid Reference:	E384921, N408266		
Site Ref Number:	12517125	Site Type: ¹	Macro

2. Pre Application Check List

Site Selection (for New Sites only)

(Would not generally apply to upgrades/alterations to existing site including redevelopment or replacement of an existing site to facilitate an upgrade or sharing with another operator)

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?		No
If no explain why: Upgrade of an existing site.		
Were industry site databases checked for suitable sites by the operator:		No
If no explain why: Upgrade of an existing site.		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	Yes
Date of pre-application contact:	17/03/2023
Name of contact:	N/A

¹ Macro or Micro

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

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Registered Address:
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Hive 2, 1530 Arlington Business Park, Theale, Berkshire, RG7 4SA.
Registered in England & Wales No. 08087551.
VAT No. GB142 8555 06

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Summary of outcome/Main issues raised:

A consultation letter, associated plans and proposed consultation plan were sent to the Chief Planning Officer at the Local Planning Authority by email on 17/03/2023. At the time of writing, a consultation response had not been received. Given the nature of the proposal being an upgrade to an existing telecommunications site, it was considered appropriate to proceed to the application stage. The Agent can be contacted during the application's determination period, should the local authority wish to discuss the proposal.

Annual area wide information to planning authority

Has annual area wide information been provided?	No
If no explain why:	
Summary issues raised: Cornerstone's commercial relationship with Virgin Media O2 and Vodafone has changed, effectively increasing their independence to work with other companies in the deployment of mobile infrastructure. It means they no longer have visibility of VMO2's and Vodafone's full update plan. However, Cornerstone is fully committed to working closely with Local Planning Authorities and following best practice guidance. Cornerstone aim to engage and work with the planning department at the earliest opportunity from when they are instructed to deliver new infrastructure within your Local Authority area and often conduct strategic pre-rollout engagement meetings to discuss their wider rollout. If your Local Authority would like a meeting to discuss wider Cornerstone rollout plans then please advise. Cornerstone recognise the importance of developing long term partnerships and will always work with you to deliver improved mobile connectivity.	

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Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline of consultation carried out: The proposal was rated Amber in accordance with the traffic light consultation model in the Code of Practice for Wireless Network Development in England (published March 2022). The community consultation plan adhered to best practice guidance. In addition to consultation with the local planning authority, consultation was also undertaken with the Council Members for the ward in which the site is located; and with the Member of Parliament for the constituency in which the site is located. Consultation correspondence enclosed with application.			
Summary of outcome/main issues raised (include copies of relevant correspondence): At the time of application submission, consultation responses have not been received from any of the consultees. The Agent can be contacted during the application's determination period, should the local authority wish to discuss the proposal.			

School/College

Location of site in relation to school/college (include name of school/college): The nearest educational facility was assessed to be: Bowlee Park Community School, Windermere Rd, Middleton, Manchester M24 4LA – located approximately 1.km distance from the site.
Outline of consultation carried out with school/college (include evidence of consultation): Given the separation distance and built-up nature of the space between the site and the school, screening any views from the school; and the fact this is an existing telecommunications site being upgraded, it was considered appropriate to proceed without directly consulting the school.

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Summary of outcome/main issues raised (include copies of main correspondence):

N/A

Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation (only required for an application for prior approval)

Will the structure be within 3km of an aerodrome or airfield?	Yes	No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	No
Details of response:		
N/A		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	30/05/2023	

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3. Proposed Development

The proposed site:

The application site is an existing telecommunications site comprising a 15m high mast, equipment cabinets and ancillary developing, including stock-proof fencing forming a site compound. The existing equipment forms a mobile base-station and it forms an important part of the Virgin Media O2 and Vodafone (the "Operators") radio networks, providing mobile connectivity to the surrounding area.

The site is located inside the grounds of a large farmstead and surrounded by agricultural fields. The farm is made-up of several large agricultural buildings. The site compound is located amongst mature trees and to the rear of an agricultural building. The site location is within the Liverpool, Manchester and West Yorkshire Green Belt. It is of note that the majority of the area and further surrounding is in the same wash over designation.

The wider area is predominately rural in nature. The M62 motorway and associated Birch Eastbound Service Station are notable land uses in the area. The existing mobile-base station at the site serves the high number of mobile users using this nearby highway infrastructure, including commuters, haulers and delivery businesses. It is this high demand for services that has contributed to the need to improve mobile connectivity in the area.

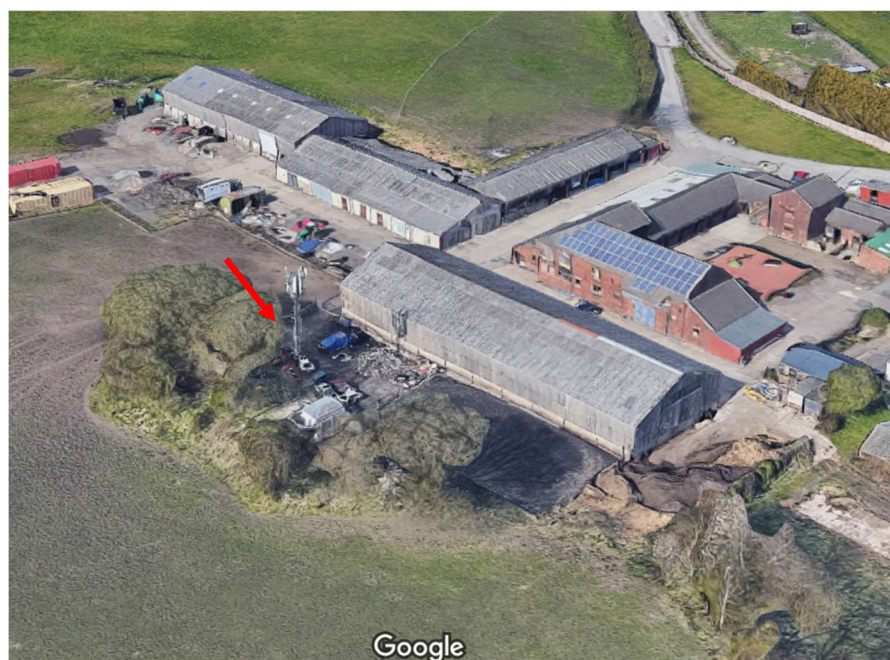
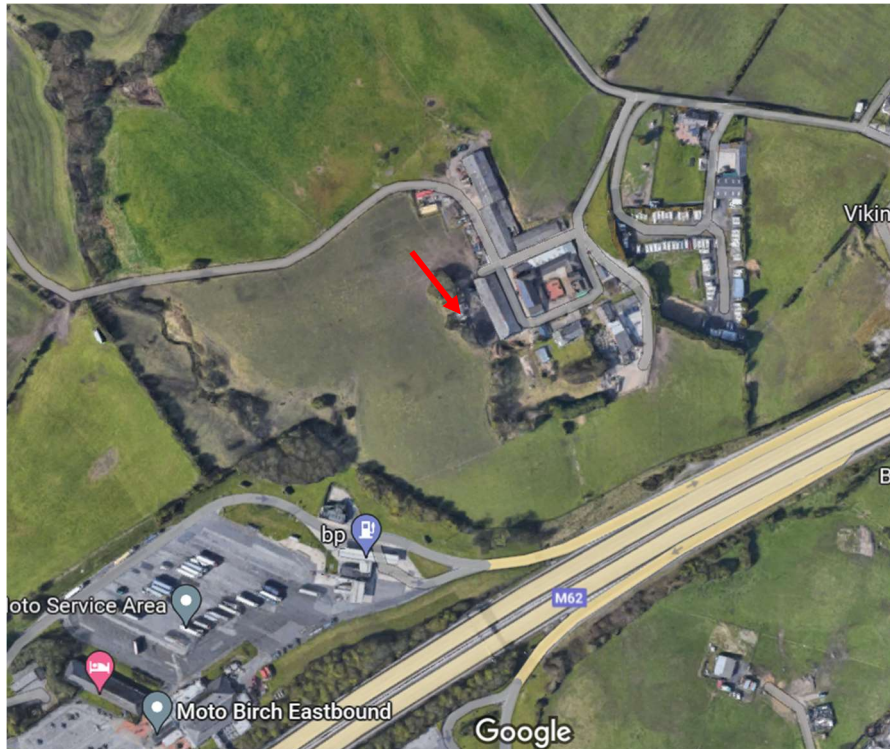
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Application Site denoted. Image source: Google

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

The proposal will ensure that the latest 3G, 3G and 4G technology will be able to be provided from this existing established radio base-station, with minimal amendments to the visual amenity of the area. This includes the superfast 2100MHz frequency required for the most advanced 4G spectrum, adding additional capacity into the operators' networks for data provision to meet the growing demand on the network, as more people access data from their hand-held devices in order to go about their daily lives. The upgraded site will also provide ultra-fast 5G connectivity to the area. This will ensure high quality and reliable connectivity, as demand on the network continues to increase exponentially.

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

Description:

Installation of 6m high steel extension and replacement head-frame onto existing 15m high mast to facilitate additional and upgraded radio antennas, ancillary works thereto.

Overall Height: 21m (antenna top height same as existing)

Height of existing building (where applicable):	N/A
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Equipment Housing:	N/A
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Length:	
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Width:	
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Height:	
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Materials (as applicable):

Tower/mast etc – type of material and external colour:	Galvanised-steel, same as existing.
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Equipment housing – type of material and external colour:	N/A
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Reasons for choice of design, making reference to pre-application responses:

Mast extension

Cornerstone are proposing to upgrade an existing mobile base-station within the cellular network. The amount of equipment proposed, its layout and design are based on the principle of meeting operational requirements, whilst minimising visual impact as far as possible.

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At present, the base-station provides services to customers that are on the Vodafone network, this proposal would allow Virgin Media O2 to share the site, making it dual-operator. Therefore, the number of people in the surrounding area that will benefit from improved connectivity will increase significantly.

The base-station has been designed to accommodate advanced radio apparatus on two mobile networks, allowing improved provision of 3G and 4G service, and the introduction of 5G mobile connections. This digital infrastructure will provide higher mobile down-load speeds and more reliable, quicker phone connections. It would provide increased network capacity, enabling reliable service provision to a higher number of people at the same time.

In order to maintain and upgrade existing services from the site and provide new 5G services, the operators require additional radio antennas. The existing mast does not have the physical space, nor the capability of supporting the cumulative weight of the required apparatus, therefore a more structurally robust head-frame is required. The latest 5G radio waves are also more susceptible to interference from physical objects in the surrounding area, such as buildings, hence the need to increase the height of the mast which will allow effective radio operations.

The antennas emit the radio coverage which enables connectivity for mobile devices such as phones and tablets. They must be allowed to unrestrictedly emit a radio signal, meaning they need to be sited at an elevated position above surrounding structures, such as buildings and trees, with the aim of reducing signal interference. The replacement antennas must therefore be elevated at the height proposed.

The antennas are strategically positioned in the top section of the monopole so that they can collectively provide 360-degree coverage to the surrounding area.

The proposed mast alteration is designed around its function as a support structure for the antennas and other apparatus it will accommodate. It's scale factors the required antenna height, as well its structural and physical capacity with respect to the amount and weight of apparatus it will support. Reducing the scale of the extension to any smaller than proposed would not allow all of the required antennas, for two mobile operators, to be accommodated and therefore customers on both

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networks would not have access to the improved mobile connectivity that they require.

The aforementioned factors have informed the design of the proposed equipment which is of an amount and scale that is capable of meeting structural and radio planning requirements. Due care has been had to limit visual impact as far as possible, working within technical constraints. The mast extension has been designed to have an indistinct appearance and should not result in a high degree of visual change, given the presence of an existing mast at the site. The extension would have a galvanised-finish to match the existing mast.

Cabinets and Compound

The proposed antennas must connect to the equipment cabinets by electrical cable feeders. The equipment cabinets form an essential component of the base-station and must be located as close to the antennas as possible in order to minimise electrical power losses during operation.

All alterations to equipment cabinets would be inside the existing cabin buildings and would therefore not be visible from public areas. This element of the proposal does not form part of the application for approval. The existing compound fencing would not be altered.

Health and Safety - including ICNIRP compliance

The Application Site complies with the International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines. A declaration of compliance is included with this Application. Paragraph 118 of the National Planning Policy Framework states:

"Local planning authorities must determine 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."

International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and

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

In order to minimise interference within its own network and with other radio networks, the mobile operators operate their networks in such a way that the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision. As part of the operators' networks, the radio base station that is the subject of this application will be configured to operate in this way.

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

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

4. Technical Justification

Enclose predictive coverage plots if appropriate, e.g. to show coverage improvement. Proposals to improve capacity will not generally require coverage plots.

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

At present, the base-station provides services to customers that are on the Vodafone network, this proposal would allow Virgin Media O2 to share that site to make it dual-operator. Therefore, the number of people in the

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surrounding area that will benefit from improved connectivity will increase significantly.

The base-station is required in order to improve the provision of 3G and 4G mobile connectivity on two licensed operators' networks, in an area where there is an identified deficiency in service levels. It has also been designed to accommodate advanced technologies in the form of 5G, introducing high-speed mobile connectivity. This critical digital infrastructure will provide higher mobile down-load speeds and more reliable, quicker phone connections to surrounding users.

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.

Base stations use radio signals to connect mobile devices to the network, enabling people to send and receive calls, texts, emails, to upload and download data, and access services and information. They are low powered radio transmitters which have a limited range, meaning that they need to be located close to the area that requires coverage.

Importantly, the base-station would also provide increased network capacity, allowing quality service provision to a higher number of people at the same time. Improving cellular connectivity is led largely by demand. The very high level of mobile phone use in the UK, requires the upgrade of existing base stations to enable the network to handle the ever-increasing high demand for connections.

While varying levels of "coverage" may presently be available from the Operators, this does not necessarily mean that there is enough network "capacity" to meet the demand for services which can consequently result in service reliability issues. Network capacity is the amount of calls and data that a base station can handle at any one time. This is a challenge for mobile networks across the country.

In response to the global COVID-19 pandemic, the UK government introduced various travel restrictions which stipulated that most of the population must only leave the house for very limited purposes. As a result, practices such as working, socialising and shopping from home became essential. These practices are reliant on digital connectivity. Consequently, mobile operators experienced an unprecedented growth in network traffic.

The pandemic has caused changes to user behaviour with increased demand for services where people live during the day, as opposed to where the existing high network capacity already exists which is in cities and around transport nodes, for

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example. This is in part due to the unprecedented number of people now working from home on a regular basis. This has caused even greater urgency to increase the capacity and capability of mobile networks in the UK, including in rural areas such as the one that the application proposal will continue to serve. The need for increased network capacity existed prior to the pandemic and has now been intensified for the foreseeable future.

The improvement in mobile reception will deliver important benefits for surrounding businesses (including farms), commuters on the nearby motorway network and residential communities. The high demand on the cellular networks is a driver behind the need for improved mobile coverage and increased network capacity.

Ofcom's Connected Nations 2020 UK report² explains the importance of having reliable mobile voice and data services, and the ever-increasing data demands on mobile networks, which this proposal would help to meet:

*"Mobile services are an important part of people's daily lives. The experiences of the **Covid-19 pandemic over the course of this year have further emphasised the reliance society and business place on access to good mobile services**, and the key role these services play in helping people communicate and stay in touch"*

*"**Mobile data consumption continues to rise, increasing by 42%** compared with last year. 83% of the total data traffic was consumed in England with about 10% in Scotland, 4% in Wales and 3% in Northern Ireland (largely in line with UK population distribution). Reflecting this growth, the traffic carried in England in June exceeded that carried across the whole UK in February." (p 30/31)*

² <https://www.ofcom.org.uk/research-and-data/multi-sector-research/infrastructure-research/connected-nations-2020>

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5. Site Selection Process

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

Site Type	Site name and address	National Grid Reference	Reason for not choosing site
N/A	N/A	N/A	N/A

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

As referred to above, the applicant has taken a sequential approach and is seeking to upgrade the existing established telecommunications site. Due to the increased size and weight of the replacement antennas, required in order to provide the enhanced coverage and network capacity, a new headframe is required. The headframe is larger than the existing, in order to be capable of structurally supporting the upgraded antennas which are heavier than their processor. The latest 5G radio waves are also more susceptible to interference from physical objects in the surrounding area, such as buildings, hence the need to increase the height of the mast which will allow effective radio operations.

These amendments to the existing radio base-station will ensure that the latest superfast technologies will be able to be accessed by users in this area. This is in line with the operator's legal license obligations, the Government's aspirations that everyone has access to the latest information super highway network, and customers' expectations that their handheld devices are able to reliably operate, wherever they are located, whether that be indoors or outside.

It is considered that utilising an existing established radio base station is preferable to pursuing a second base station within the immediate vicinity because it would reduce the visual impact, therefore preserving the character and appearance of the surrounding area. Given the makeup of the area and the siting of existing telecoms infrastructure on the site, it was established that the upgrading of facilities through the use of existing infrastructure would be the most viable solution. Based on this sequential approach, no other sites have been considered.

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Land use planning designations:

The application site is located inside the Green Belt. The land designation is discussed in the proceeding section.

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

Local planning policy

In the context of the proposal being permitted development, Section 38(6) of the Planning and Compulsory Purchase Act 2004 does not apply to Class A of Part 16 of the General Permitted Development Order (GPDO) because the GPDO does not require regard to be had to the Development Plan. However, Development plan policies may be of material consideration to this proposal if they relate to siting and appearance. The following appeal decision, issued February 2022, clarifies:

*"Part 16 of the Order establishes that the proposal is permitted development and therefore it is accepted in principle by virtue of the legislation. Furthermore, **there is no requirement to have regard to the development plan** as there would be for any development requiring planning permission.*

*Nevertheless, policies S25 and S28 of the Westminster City Plan (2016), policies DES1, DES6 and DES9 of the City of Westminster - Unitary Development Plan (2007), as well as policies 19QA, 38, 39 and 40 of the City of Westminster - City Plan (2021) **are material considerations as they relate to issues of siting and appearance.**"*
(paragraphs 3 & 4, appeal case APP/X5990/W/21/3284041)

Relevant parts of Rochdale Council's Development Plan come from:

- Rochdale Core Strategy (adopted 2016)
- Unitary Development Plan (adopted 2006)

Core Strategy

I POLICY P3: IMPROVING DESIGN OF NEW DEVELOPMENT

Most of this policy is not relevant to the application proposal; however, in relation to the policy objective 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"*, it is noted that the proposed alterations to the mast are proportionate in scale and massing to the existing mast, will use matching materials,

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and will remain respectful to the site's context, which is the farm and associated agricultural fields. The degree of visual change at the site would be limited.

Unitary Development Plan

I POLICY CF/6: TELECOMMUNICATIONS

The proposal performs well when appraised against Policy CF/6 criteria. In particular, the upgrade will meet the ever-increasing demand for network capacity, and provide people in the surrounding area with more advanced and reliable connectivity, facilitating notable public benefits in the process.

This will be achieved in a way that would not be determinantal to the visual amenity of the area (criterion b); the proposed alterations to the mast would facilitate the site becoming dual-operator i.e. shared by two operators (criterion c); and the proposed mast extension and replacement head-frame has been kept the minimum scale necessary, commensurate with the need to host the radio equipment of two operators and provide the latest advanced technologies across both networks i.e the "technical and operational considerations" (criterion e).

Greater Manchester Digital Strategy 2018-2020

The application site is in Greater Manchester where the Greater Manchester Combined Authority has adopted a strategy setting out priorities for creating a leading digital city-region. The strategy adds further context to the critical need and wider benefits of access to the latest digital services, including mobile connectivity.

"We live in a world where the number of digital devices has now passed the number of people. Digital technology is re-shaping every aspect of our lives in ways which were inconceivable a generation ago: how we work, travel, shop, access services, meet people, communicate and are entertained..."

We can only be a world leading city-region if we bridge the digital divide. Progress must be universal; geographically, socially and economically. It is this unique approach that we believe sets us apart. We will put people at the heart of our plans, for example, by using digital to connect young people to opportunity or tackle homelessness.

At the same time, we will capitalise on GM's unique ability to use digital to connect and enhance our other high value sectors such as creative industries, health innovation and advanced manufacturing and materials"

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The strategy's aim to "bridge the digital divide" and the potential for digital to tackle issues such as homelessness, links to the Vision of the Oldham's Core Strategy to create inclusive communities. The proposal would contribute to achieving these ambitions through the improvement of mobile connectivity. The strategy's recognition of the economic opportunities of digital connectivity, including in creative industries and in health care, is also testament to the significance to the proposal.

The strategy establishes actions to achieve the city-region's digital ambitions, which the appeal proposal will deliver through new infrastructure provision:

"These actions will increase average mobile and fixed broadband internet speeds, and expand the availability and reliability of online access to a wider group of people. They will therefore contribute to local demand for digital services, and enabling industrial and service delivery models that are highly data- intensive..."

- *Improving call and mobile coverage including securing a national 5G test bed status, thus positioning GM at the forefront of next generation 5G mobile"*

The Greater Manchester Digital Blueprint April 2025

The Blueprint builds on the GM Digital Strategy and sets out the next chapter in Greater Manchester's ambition to be a world leading city- region, recognised globally for its digital innovation.

The blueprint contains "digital priorities" which include "Extending our world-class digital infrastructure". To achieve this aim, the blueprint advises that the Greater Manchester local authorities will:

"Remove bandwidth as a barrier to our social, economic and public sector reform objectives.

Deliver ubiquitous high speed digital connectivity over full fibre and 4G & 5G mobile across the whole city region by 2025.

Accelerate market investment by:

- *Extending network reach by connecting over 1600 public sector sites and assets with Full Fibre across Greater Manchester*
- *Making public sector buildings and other assets available for infrastructure to support 5G roll out*
- *Driving market investment in fibre and mobile by minimizing roll out costs through a Prospectus agreed by Greater Manchester local authorities"*

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The proposal would increase bandwidth by providing additional mobile network capacity, resulting in more reliable connectivity for a higher number of people, responding to the ever-increasing high demand on the network. The proposal would also deliver high-speed mobile connectivity, including the provision of 5G services to an area where the Operators don't have coverage at present. The proposal would make a key contribution to delivering the digital aims for the city-region.

National Planning Guidance

Planning policy is provided at the national level by the National Planning Policy Framework (NPPF). It is a material consideration in planning decisions. It is not necessary to quote extensively from this document but the following points are highlighted.

National Planning Policy Framework (July 2021)

The Government's National Planning Policy Framework (NPPF) was published on 24 July 2018 and updates the 2012 version. In February 2019 the NPPF was revised again, with minor alterations to wording relating to housing supply and not any parts relating to telecommunications. The NPPF was updated in July 2021, in order to strengthen sections including requirements on improved design quality, a new requirement for Councils to produce local design codes or guides, an emphasis on using trees in new developments, revised policies on plan-making, removing statues and opting out of PD rights relating to residential conversions.

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 114 states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. This wording echoes guidance set out in paragraph 42 of the 2012 version of NPPF. However, it also includes the importance of reliable communications infrastructure for both economic growth and social well-being.

The NPPF continues to support the expansion of electronic communications networks at paragraph 114. It 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.

The NPPF makes reference to 5G:

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*'Planning policies and **decisions should support the expansion of electronic communications networks**, including next generation mobile technology (such as 5G)...'* (para. 14)

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.

Paragraph 115 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.

Paragraph 118 of the NPPF retains the guidance set out in paragraph 46 of the 2012 NPPF version which 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.

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.

The NPPF continues to provide guidance on decision-making. At paragraph 38 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'.*

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The NPPF builds on the aspiration to build a strong, competitive economy. Paragraph 81 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 innovation⁴²'...*

Footnote 42 of the NPPF states:

*'The Government's Industrial Strategy sets out a vision to drive productivity improvements across the UK, identifies a number of Grand Challenges facing all nations, and sets out a delivery programme to make the UK a leader in four of these: **artificial intelligence and big data**; clean growth; future mobility and catering for an ageing society. HM Government (2017) Industrial Strategy: Building a Britain fit for the future'.*

Code of Practice for Wireless Network Development in England

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

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

The Code of Practice covers all forms of wireless infrastructure development, including mobile masts and cabinets. It is recommended that other wireless communications operators follow the principles of this Code of Practice, where appropriate.

Unlike previous iterations this Code of Practice has been led by the Department for Digital, Culture, Media and Sport (DCMS) and developed in collaboration with

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representatives of the mobile network industry, other government departments and public bodies, local planning authorities, and protected landscapes. This document replaces the previous Code of Best Practice on Mobile Network Development, which was published in 2016 and is now published by DCMS.

The CoP sets out the legal and policy framework for the delivery of wireless infrastructure development.

Paragraph 8 of the revised Code acknowledges that connectivity is vital to enable people to stay connected and that fast, reliable digital connectivity can deliver economic, social and well-being benefits for the whole of the UK. The Code continues to acknowledge that as the demand for mobile data in the United Kingdom is increasing rapidly, and that it is important that everyone has access to dependable and consistent mobile coverage where they live, work and travel.

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.

The CoP sets out 'How wireless networks function.

Para. 16 states “Cellular wireless networks use base stations to provide an area of radio coverage. Wireless technology uses the radio spectrum to broadcast radio waves between base stations and devices. **Different radio frequencies have different characteristics which, along with the density of cell site locations, affect the extent of coverage and how much data can be carried over the network.** Depending on the radio frequencies used, base stations can deliver coverage over a wide area or provide extra network capacity in areas where there is a high demand for network bandwidth”.

Para. 17 sets out that “Wireless technology continues to evolve rapidly, and mobile devices are now capable of much more. Second generation (2G) technology gave us voice calls and text messages, 3G led to the launch of smartphones, and 4G, which enabled faster browsing, allowed us to do things like watching videos on the move. **5G, the latest generation of wireless technology, is much faster than previous generations of wireless technology and can offer greater capacity and lower**

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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”.

The CoP establishes ‘Principles and commitments’ by which operators should develop their networks and that Local Planning Authorities should demonstrate their support by.

Para. 18 states “Operators should develop their networks and install wireless infrastructure according to the following principles and commitments:

- **Site sharing and use of existing infrastructure:** make use of existing structures, sites and masts wherever possible to reduce the need for new development. The NPPF states that, when installing mobile infrastructure, the number of masts and sites should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion.
- **Consultation with local planning authorities, local communities and other stakeholders:** participate in dialogue with local planning authorities, along with other relevant stakeholders such as the highways authorities, Area of Outstanding Natural Beauty bodies, Historic England, and Natural England, including pre-application discussions, where appropriate. Maintain clear procedures, and high quality communication and consultation with local communities and other interested parties. Operators should agree community engagement with local planning authorities and share information as appropriate (see Pre-application consultation with local communities below).
- **Standardised and high-quality approach to planning applications, and the notification procedure:** provide standardised supporting documentation for planning applications (where appropriate) within the context of national and local requirements. Ensure planning submissions are of high-quality and provide the necessary evidence to support the application (as per the NPPF).
- **Prompt responses to enquiries:** respond to complaints and enquiries within a timely manner (see Review and Enquiries section below).
- **Siting and Design:** wireless infrastructure should be deployed in accordance with the guidance set out within this Code of Practice. Where appropriate, equipment should comply with the principles set out in the NPPF and consider any local planning policies, including any local and national design codes. When located in protected landscapes and other designated land, the sensitive nature of these areas must be considered.
- **Removal of redundant equipment and site restoration:** ensure that when infrastructure is upgraded, any equipment that is made redundant by the upgrade, such as brackets, is removed to benefit the local environment. Where a whole site is no longer in use, the site should be restored to its original state.

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- **Compliance with guidance laid out in the International Commission on Non-Ionizing Radiation Protection (ICNIRP) public exposure levels guidance:** as required

by spectrum licences, comply with international guidelines for limiting exposure to electromagnetic fields (EMF) - including, as set out in the NPPF, providing a statement that self-certifies that ICNIRP guidelines will be met with all applications (see Annex C)."

Paragraph 19 states that Local Planning Authorities should demonstrate their support by:

- **"Incentivising connectivity:** support the expansion of telecommunications networks and take a 'joined-up' approach to the wireless infrastructure planning process, including ensuring that Local Plans effectively support the deployment of digital infrastructure.
- **Facilitating sites:** engage with operators when new sites have been proposed and discuss site requirements.
- **Engagement with operators:** respond positively to requests for engagement and make decisions in line with national policy and Local Plans. For planning applications, find solutions to issues and ensure timely decisions are made.
- **Information and communication:** ensure that members of the public can access information about any development proposals within their local area. Send communications promptly to an appropriate operator contact (or their representatives)".

The added emphasis on support from Local Planning Authorities in the deployment in digital infrastructure is even more evident in the revised CoP. The CoP recognises the importance of collaboration and partnership to help drive network coverage across the country. It goes on to state that *'In all instances, it is important for all parties involved in the process to take a positive approach to consultation and engagement'*.

SITING AND DESIGN PRINCIPLES

The government's objective is to deliver high quality, reliable wireless infrastructure whilst ensuring the impact of new network development is kept to a minimum. The siting and design of wireless network infrastructure is central to achieving this. The CoP acknowledges that *'good siting and design principles should apply to all wireless network development and take into account any site specific considerations and context. Both can create better places in which to live and work and help make development acceptable to communities'*.

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The Code provides guidance on siting and appearance principles. It sets out several design principles in respect of telecommunications development and acknowledges that the options for design used by an operator will be affected by site conditions including requirements to link the site to the network, landscape features and coverage and capacity requirements. The guidance includes at Para. 22 *'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'*.

Para. 23 confirms that 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 (emphasis added).

Paragraphs 24 - 27 sets out general siting and site selection principles which Operators should consider. The CoP acknowledges at Para. 24 that:

'Operators use a range of sophisticated, computer-based planning tools to predict levels of signal strength and coverage from sites for 2G, 3G, 4G and now 5G. Once an operator has identified a requirement for a new cell site, a suitable site needs to be found. Elements that make a site favourable include: having 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. Operators will typically look to upgrade existing infrastructure prior to considering a new deployment, in particular for initial 5G deployment'

Para 25 notes that:

'When selecting sites for mobile infrastructure, operators should examine local plans and designations for the area, as well as carrying out an in-person site search to identify potential options which meet their requirements. Operators should follow these general siting and site selection principles:

- Installation on existing buildings and structures;*
- Erecting new ground based masts;*
- Camouflaging or disguising equipment where appropriate;*
- Using small scale equipment (although small cells themselves are generally used to address capacity issues as opposed to providing coverage); and*
- Mast and/or site sharing (including **redevelopment of a site to enable upgrade or sharing with another operator**)'.*

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Para. 26 highlights that the installation of all wireless infrastructure requires a balanced approach between the technical needs and constraints of the proposed site and the potential impact of the development. The three key technical and operational considerations for installation sites are:

- **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 the demand for network capacity in a particular area, additional sites may be required within that coverage area to meet the demand. This is more likely to be required in densely populated areas or areas of high footfall.
- **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.

Para 27 requires that Local Planning Authorities consider these issues and consider the need for a site within a limited search area alongside the public benefit of improved connectivity. Para. 27 further considers that 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.

In respect of 'Design', the CoP at Para 28 acknowledges that the siting of wireless infrastructure will influence which design options are most appropriate for reducing the visual impact including

- Protecting visual amenity
- Mitigating visual impacts

Para. 29 acknowledges that these factors along with location and the coverage and capacity requirements can influence the type of infrastructure structure that is deployed and requires that *'planning authorities should be aware of these constraints when considering proposals. In particular:*

- *In urban areas, where there is a high level of demand for mobile data, mobile base stations are likely to need to be deployed more densely. In these settings you can expect to see more use of streetwork monopoles and rooftop installations and, in future, we are likely to see a larger number of smaller units (so-called "small cells") deployed on buildings and on street furniture.*
- ***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***

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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'.*

The CoP establishes radio equipment housing (cabinets) principles. The CoP at Para. 30 states that “cabinets protect radio transmitters and receivers, provide the power source for mobile equipment, and are connected to antennas via cables.

Equipment cabinets are likely to be needed at most sites. The cabinets must be of sufficient size to facilitate hosting various operating equipment whilst also allowing air circulation to reduce the potential for overheating”. The CoP establishes the planning and visual considerations for siting radio housing. These include:

- Colouring
- Siting on highways and footways:
- Highway safety:
- Listed buildings/ scheduled monuments and Conservation Areas:
- Access
- Trees

Connected Nations 2021 Report (June 2021)

The importance of the internet and access to smartphones is acknowledged within the latest Online Nation 2021 Report (June 2021). The report notes that the pandemic has highlighted the importance of being online and driven changes in the take-up and use of internet services, as many people have had a critical reliance on the internet for communications, information, entertainment and commerce. Increases in internet use in 2020 were most pronounced in spring and November 2020 lockdowns, as people turned to the internet and were more dependent than ever on online services for video calling for socialising or home-based working, home schooling, keeping in touch, films and gaming, shopping and information about the pandemic.

In September 2020, UK Internet **users spent nearly 4 times as much time on smartphones than they did on computers.** 68% of the time spent online was via smartphones up 4% from September 2019, this was compared to 18% of time spent on line via computers and 13% via tablets.

By the end of 2020 approximately 94% of UK homes had internet access, up from 89% in 2019. Video calling became an important way for people to keep in touch during the pandemic. Zoom went from a few hundred thousand users in the first few months of 2020 to more than 13 million in April and May 2020. This has dropped to 10.4 million users in March 2021, while platforms used mainly for work and education,

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notably Microsoft Teams have shown a sustained increase in use (13.7 million users in March 2021m up by 5.3 million year on year).

The report found that **most of the time people spend on the internet is via apps on mobile devices**. Online services were a crucial way for people to find out information about the pandemic, and for governments to try and track and control the spread of the virus.

The report acknowledged that the **internet helped most children continue their education throughout lockdown**. Virtually all households with school-aged children had access to the internet at home. 7% did not have fixed broadband and 4% had access only to a mobile phone. 1 in 5 did not have access to an appropriate device for their schoolwork all the time. The Report found that 2020 saw the rapid adoption of digital remote education by teachers, parents and children such as video conferencing, and platforms for setting and collecting work. In the first few weeks of lockdown in spring 2020, two thirds of children in England were not receiving any live or recorded lessons. By January 2021, this was down to just one in ten. The Report suggests that the use of these platforms may continue such as for those who can't attend school due to illness, or to provide additional revision materials.

Nine in ten 8 – 15 year olds who use social-media said it helped them to feel closer to their friends in 2020. The report stated that social video services offer huge benefits for users and the economy. They provide a platform for self-expression through enabling user-generated content (31% of adults and 40% of 13-17 year olds post video content).

Lockdown influenced the types of social video that were most popular such as the first episode of Joe Wicks' PE which was the most viewed YouTube video of 2020, and videos relating to home baking such as sourdough bread increased by 458%. **Social media serves as a means of entertainment and education for many** (used by 97% of adult internet users), and as an important method of marketing for businesses (online video advertising grew by 23% in the UK in 2020).

On line retail spend in the UK increased by 48% in 2020 (compared to an average annual increase of 13% in the previous 4 years). Online's share of retail spend increased from approximately 20% in 2019 to 35% in the spring lockdown and 30% in December 2020. By December 2020 11% of the UK grocery market sales were online, up from 5% at the beginning of the year. Online food delivery services also increased in demand. Just Eat being the most popular with its UK orders up 58% higher in the last quarter of 202 compared to the same period in 2019.

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People have relied on the internet for news and information throughout the pandemic. During the spring 2020 lockdown 52% of people said that news and current affairs was one of their main reasons to go online.

Adults are as likely to use social media to find information about the COVID-19 pandemic as they are to use news sites and apps (approximately 1 in 3). Whilst one in eight 16 – 24 year olds considered social media to be their most important source of information about the coronavirus pandemic, compared to 5% of all UK online adults.

The report found that **91% of households used smartphones to access the internet in 2021**, compared to 65% who used tablets and 47% who accessed the internet using computers. The report also noted that 61% of UK adults who access the internet did so using both computers and smart devices.

The Report notes that the smartphone is the most-used device for accessing the internet for all age groups apart from those aged 65 +. It found that in 2020, 85% of internet users aged 16 + used a smartphone to go online, compared to nearly 75% accessing the internet via a computer and just over 50% using a tablet to access the internet. One in ten adults also stated that they only use a smartphone to go online and three in ten used their phone to complete an online form or app on a weekly basis.

In February 2021 the Government said that more than 1.7 million app users across England and Wales had been advised to isolate by the NHS COVID-19 app, following close contact with someone who had tested positive.

Levelling Up the United Kingdom (February 2022)

Digital Connectivity is a focus area and the mission is 'By 2030, the UK will have nationwide gigabit-capable broadband and 4G coverage, with 5G coverage for the majority of the population'.

Chapter 3 - The Policy Programme:

Para 3.2.4 - By 2030, the UK will have nationwide gigabit-capable broadband and 4G coverage, with 5G coverage for the majority of the population

This mission is focused on improving digital connectivity.

Digital connectivity: The case for action

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The COVID-19 pandemic demonstrated the importance of digital infrastructure right across society, from ensuring business continuity to reducing isolation. Improved digital connectivity has the potential to drive growth and productivity across the UK and widen job opportunities through remote working. However, **there are significant spatial disparities in the quality of broadband and mobile networks, with rural areas likely to experience worse digital connectivity than urban areas**. Infrastructure is only part of the picture: economic benefits will only materialise if businesses and workers have the skills to take advantage of improved infrastructure.

More broadly, **high quality digital infrastructure can deepen local labour markets through remote working, making it more attractive for both workers and companies** to locate regionally. It also allows for the development of high-value sectoral clusters, which can drive growth and jobs in new areas. Existing specialisms in the UK regions have the potential to generate strong tech clusters, such as fintech in Scotland and Wales, e-Commerce in the North West and Northern Ireland, and Agri-Tech in Yorkshire and the Humber. The sector also provides opportunities for raising living standards – median earnings for the sector are 50% higher than the UK average.

The policy programme In 2020, the **UK Government published the National Infrastructure Strategy, committing to providing £5bn in public funding to roll out gigabit broadband** to at least 85% of the country by 2025, and subsequently to as close to 100% as possible, working with the private sector.

Public investment will target premises that are hardest to reach and which would otherwise not be provided for by the private sector, ensuring no areas are left behind. Gigabit coverage has increased from 10% to over 60% in less than two years. Since 2019, coverage has improved across the UK, and the UK Government anticipates the following additional improvements to be delivered as a minimum by 2025, as set out below.

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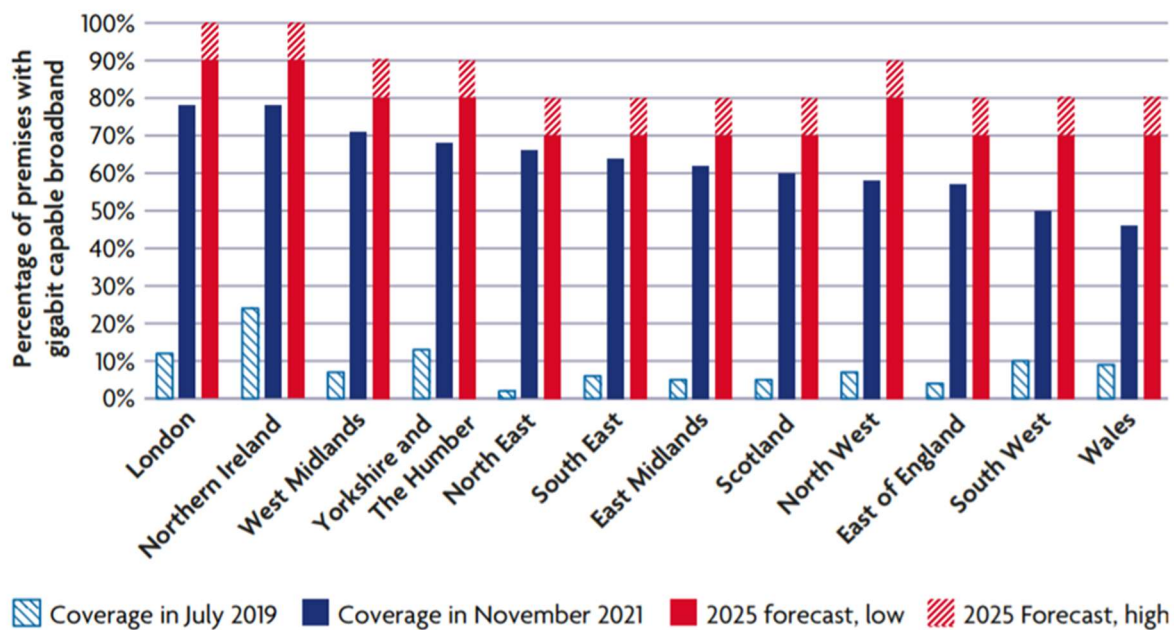
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Figure 3.1 Gigabit coverage improvements, UK countries and regions, 2019, 2021 and 2025 (forecast)



Source: Levelling Up the United Kingdom.

5G has the potential to radically change the way people live and make businesses more productive and competitive. The UK Government's ambition is for the majority of the population to have access to a 5G signal by 2027. Since 2017, the UK Government has provided £200m in funding for 5G Testbeds and Trials, supporting over 200 startups and SMEs across a range of sectors – including healthcare, manufacturing, Agri-Tech and creative industries – to better understand how to use the technology to develop new solutions and services.

In 2022, the UK Government will publish the **Wireless Infrastructure Strategy**. This will review how far the private sector will go to deliver wireless infrastructure – including 5G – across the country, and determine whether there are any market failures in places that need to be addressed, and how the UK Government could tackle these.

Box 3.9 - West Midlands 5G The West Midlands 5G (WM5G) Testbed started in 2018 with the mission of testing and proving the benefits of 5G to public and private sector productivity, creating jobs and boosting growth. The UK Government has invested £21m over three years, alongside investment from local government and the private sector. By working with local authorities and Mobile Network Operators (MNOs), WM5G has accelerated 5G deployment by over six months, resulting in the West Midlands being amongst the best connected places for 5G in the UK. In addition, WM5G has delivered a number of UK firsts, including **a 5G road sensor**

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network, 5G connected ambulance and capsule endoscopy trials, and a 5G application accelerator programme called 5sprinG, which has already upskilled over 400 organisations on the benefits of 5G and allowed over 60 start-ups to develop new 5G products and services.

We must **ensure that people have sufficient digital skills to reap the benefits and prosperity arising from the digital economy**. In 2020, the UK Government introduced a new digital skills entitlement, giving adults with low or no digital skills in England free access to new digital skills qualifications based on employer-supported national standards. The UK Government continues to work with local leaders to develop Local Digital Skills Partnerships. These collaborative partnerships are now operating in seven regions across England, with an eighth formally launching in Hull and East Yorkshire in early March. The UK Government will work with devolved administrations to consider how best to share the insights and evaluation of the programme to help build digital skills capability across the UK.

Planning Assessment

The main issues arising from this prior approval notification are whether the proposed mast alterations, due to their appearance, would be a visually obtrusive feature which would be detrimental to the character and appearance of the area, and whether any perceived harm would outweigh the significant social and economic benefits associated with the increased service provision attributed to the proposal, and other valid material considerations as outlined in NPPF and in relevant policies from the Rochdale development plan. Installation of antennas and equipment cabinets is permitted development, not requiring prior approval.

The principle of siting telecommunications equipment in this location was accepted many years ago. The installation has been in situ for many years and is an established feature of the local landscape. It currently provides coverage to the local area. The proposal will allow for the upgrade of the existing coverage and capacity on the 3G/4G networks, and will also allow for new 5G coverage to be provided for two mobile operators.

The proposal fully complies with Policies P3 and CF/6 of the Rochdale development plan, as discussed in the earlier policy appraisal and in the context of the proposal improving digital connectivity for the surrounding area, including for local residents, businesses and farmers.

Access to a high quality, reliable superfast mobile network is not just 'a nice to have' but an essential part of everyday life. Indeed many, including the former Minister for Digital Infrastructure Matt Warman, consider it to be the fourth utility service as important as gas, water and electricity, a life line for many especially during the

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COVID-19 pandemic where people were able to see their loved ones, speak to friends and family and arrange virtual meetings allowing some form of normality in a very abnormal situation.

The principle of the development has been established by the Government when the new permitted development rights came in to force in April 2022, which enabled sites such as this one to be built under the operators permitted development rights, with prior approval for siting and appearance being the only matters that the local planning authority can take in to consideration.

Planning Practice Guidance explains how a prior approval application differs from a planning application at paragraph 28. It states that:

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

The Planning Portal also provides Application Type Guidance. This guidance states that:

'Certain forms of telecommunication development, for example, mobile telephone masts, are known as 'permitted development' and subject to prior approval from the local planning authority. The prior approval procedure means that the principle of development is not an issue. The LPA can only consider the siting and appearance of the proposal'.

Siting

The proposal is for the upgrade of the existing telecommunications site located at Doctor Fold Lane. The principle of telecommunications development in this location has already been accepted by the Local Planning Authority. The upgrade of an existing site is wholly in line with national planning policy guidance and Policy CF/6 relating to digital connectivity, and on taking a sequential approach by seeking to upgrade existing sites first.

Government guidance states that in order to limit visual intrusion, the number of radio and telecommunication masts and the sites should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and

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providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability should be encouraged. The application proposal will prevent the need for an additional mast in the local area.

The proposal fully complies with this Government guidance. The existing site will be upgraded, allowing the Operator to provide better quality coverage and capacity to the area. The site will provide 3G, 4G and 5G coverage for users living, working or commuting through the local area. This is fully in line with Policy CF/6 and the NPPF, which recognise the importance of improving digital infrastructure and connectivity.

Appearance

The design of the alterations has been carefully considered. A wider headframe is required to allow for the upgraded antennas to be installed at the required orientations. The more structurally robust frame will be capable of supporting the increase in the amount of radio equipment required for the upgrade – both with respect to its cumulative weight and with respect to the weight of the individual antennas, which are heavier due to their higher technical capability.

The least amount of equipment possible has been proposed to minimise its visual impact. The proposed heads-frame will be coloured green as this is considered the best colour to assimilate with the background setting. Equipment is of the minimum amount and scale possible, while still being capable of delivering effective the digital infrastructure that Policy D1.12 aspires for.

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 a shroud is made from. This affects the 5G antennas more so than any other technology. The result being they cannot operate effectively close to Glass Reinforced Plastic or any other blocking material. Therefore, there is a technical reason why the 5G antennas need to be unshrouded. 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 Gateshead achieve optimum coverage levels and provision of new 5G coverage, in line with the NPPF and aspirations in the local plan.

If the headframe was to be any slimmer, then the multi technologies for would not be able to fit on the same installation and an additional radio base station would be required, which would be contrary to national planning guidance. It would also not be structurally incapable of supporting all of the technologies.

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The replacement headframe will allow the antennas and dishes to be orientated in a way which maximises the 5G provision to the area. A smaller headframe would not be able to host all of the required antennas and would restrict the orientation of the antennas it could hold, which would not adequately serve the operators' target coverage area and would therefore fail the design brief.

In addition, if the height of the mast was not extended and the antennas were to be sited any lower than proposed, then their emitted radio waves would not be able to clear buildings and trees in the surrounding area, and as such would not be able to operate effectively. This is particularly relevant to 5G services.

Also, the dishes would not be able to transmit their micro-waves with an effective line of sight to neighbouring base-stations. A lower height would lead to a poor user experience for a large part of the target coverage area. 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.

The photograph below shows that the existing mast does not dominate the landscape, in the context of the site's setting which includes existing vertical structures including a telegraph pole at the host farm. The scale of the alterations proposed should not greatly change this situation. The proposed alterations are moderate and a case is made that this limited visual change in the landscape is outweighed by technical constraints and by the significant planning need, and associated public benefits, of delivering improved mobile connectivity to the area, as identified as being a priority in the development plan and in strategies for Greater Manchester.

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*Photograph of existing mast, taken from Dr Fold Ln
Image source: Google*

The proposed upgrade accords with NPPF because the equipment will expand two operator's networks, ensuring high quality communications infrastructure is maintained whilst minimising the number of radio base stations in the area. The height and amount of equipment has been minimised so far as practicable. Utilising simple and unfussy designs is acknowledged in the Code of Practice on Mobile Network Development in England to be less likely to dominate and be in discord with the local landscape, and as a result less likely to have a detrimental impact on the visual amenity of the surrounding area.

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Economic and Social Benefits

The NPPF strongly supports sustainable development, as does the Rochdale development plan. 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 Policy GP20 of the local plan to minimise the effects of climate change by reducing the need to travel and therefore the carbon footprint.

In such instances, as described above, the NPPF supports development that improves the economic, social and environmental conditions in the area. Ensuring that the 3G and 4G coverage and capacity in this area is maintained and enhanced, and providing new 5G services, and continuing to transform the digital connectivity of the city to drive economic growth and innovation, working to meet national targets of full roll-out of 5G technology for most people by 2027, will fully meet this national policy objective.

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. 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.

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 also helps the economy to be resilient and competitive. This is in full accordance with the ambition of the Oldham development plan.

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It will help Rochdale become an area where 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, and pollution; to improve living standards and well-being, helping people to lead prosperous and rewarding lives; and to improve the quality and value for money of public services.

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.

Paragraph 38 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'.*

Providing enhanced 3G and 4G coverage and capacity and new 5G service provision in this area will fully meet paragraph 38 of the NPPF, to develop the best in class digital infrastructure to underpin the efficient functioning and growth of the regional economy, and identify opportunities to improve and accelerate the roll out of fibre, 4G and 5G technologies to accelerate business opportunities and growth to gain regional competitive advantage.

The social and economic benefits are a significant material consideration which should be weighed against the visual impact associated with the upgrade to the existing 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.

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

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*'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.'*

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

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. Enabling and planning for 5G implementation is central to achieving the Government's objective to deliver property at the local level and enable all places to share in the proceeds of growth.

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.

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 and farmers, all through the real-time management of data.

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The Local Government Association (LGA) has produced a Councillor's Guide to Digital Connectivity and sets out some of the benefits of 5G technology:

- **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:
 - o **Transport and logistics:** connected parcels and fleet tracking.
 - o **Health and social care.**
 - o **Environmental monitoring:** sensors monitoring air quality and water pollution in real-time.
 - o **Smart agriculture** and smart animal farming, smart retailing.
 - o **Connected and autonomous cars:** allowing cars to communicate with each other, other road users and even the road infrastructure.

A National Needs Assessment – A Vision for UK Infrastructure was also published in October 2016 ([https://www.ice.org.uk/getattachment/media-and-policy/policy/national-needs-assessment-a-vision-for-uk-infrastr/National-Needs-Assessment-PDF-\(1\).pdf.aspx](https://www.ice.org.uk/getattachment/media-and-policy/policy/national-needs-assessment-a-vision-for-uk-infrastr/National-Needs-Assessment-PDF-(1).pdf.aspx)). It sets out the infrastructure needs for the UK which includes the importance of digital technology. An extract of this assessment can be found below:

*'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**'*

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 maintaining and enhancing high quality 23G and 4G coverage and capacity in Rochdale, as well as providing 5G on the operator's network, where the social and economic benefits will outweigh the visual change.

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

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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 upgrade the existing site in this area to provide enhanced mobile connectivity is significant.

On the 23 September 2020, the former Digital Infrastructure Minister Matt Warman MP spoke about the ongoing work by the Government and telecoms industry to boost the UK's world class digital connectivity in his keynote speech at Connected Britain 2020 :

...'I'd like to take this opportunity to thank everyone in the industry for their tireless efforts at keeping us all connected through an unprecedented period of disruption.

*...COVID has altered the way we live, work and most importantly, stay connected with our family and friends. **The digital infrastructure that keeps us all connected was essential to our daily way of life under lockdown – and is now more important than ever as we head into recovery.** Many of these changes – such as increased working from home – will stay with us for the foreseeable future.*

*People have referred to the internet as “the fourth utility” – and it's true. For countless people across the country, **having fast and reliable broadband and a good mobile connection is as essential and vital to our daily lives as gas, water and electricity.***

That's why I'm committed to working with you to ensure the entire nation has access to world-class, next generation gigabit connectivity that is secure and resilient enough to deal with all sorts of future challenges.

This Government is ambitious for the UK's digital infrastructure.

And because we know that more citizens are increasingly living their lives online, we will be one of the earliest adopters of 5G coverage, with the majority of the population able to access 5G by 2027.

...We know how important local authorities are to the delivery of digital infrastructure, which is why I have written to them, together with the Local Government Minister, to outline how they can work more effectively with the industry...

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...Turning to 5G, while the commercial rollout of 5G continues at pace, we're pushing ahead with plans to make sure all sorts of industries benefit from this **game-changing technology**.

...since the start of the 5G Testbeds and trials programme, we've now funded 24 5G testbeds across the UK. Between them, those testbeds have trialled almost 70 different 5G technologies, products and applications. And more importantly than ever, we are investing in a range of sectors to foster, build and grow 5G cross wider industry...

...The world is in the middle of a digital revolution. COVID has accelerated this process, digitising almost every part of our everyday lives and making **the infrastructure that connects us more important than ever**. That's why it is at the top of the government's agenda..."

In a more recent letter published by the former Digital Infrastructure Minister Matt Warman MP on the 24 May 2021 he spoke further about the Government's Commitment to extending mobile coverage:

'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...

...The National Planning Policy Framework ("the Framework") for England states that planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology, such as 5G...

...In relation to electronic communications development, it also states that local planning authorities must determine applications on planning grounds only and they should not seek to prevent competition between different operators or question the need for an electronic communications system. As set out in planning practice guidance, **it is in the public interest for local planning authorities to have effective delegation arrangements in place to ensure that decisions on planning applications that raise no significant planning issues are made quickly** and that resources are appropriately concentrated on the applications of greatest significance to the local area'.

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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.

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.

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'**.

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.

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.

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.

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.

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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.

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.

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.

In the recent Levelling Up and Regeneration Bill, which set out “12 bold, national missions” which will be given legal status, Mission 4 is:

“By 2030, the UK will have nationwide gigabit-capable broadband and 4G coverage, with 5G coverage for most of the population”.

It highlights the important benefits that high quality, reliable connectivity can provide, particularly in rural areas. It states:

*“The COVID-19 pandemic demonstrated the importance of digital infrastructure right across society, from ensuring business continuity to reducing isolation. **Improved digital connectivity has the potential to drive growth and productivity across the UK and widen job opportunities through remote working.** However, there are significant spatial disparities in the quality of broadband and mobile networks, with rural areas likely to experience worse digital connectivity than urban areas.”*

The proposed upgrade of the existing installation in this location will allow the operator to provide replacement high quality 3G and 4G coverage and capacity

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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 Ryedale development plan.

Practical Applications of 5G Connectivity as Example of Material Soci-Economic Benefit

Education

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.

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.

Health

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.

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.

Summary

This is an upgrade to an existing single-operator radio base station that would facilitate the site becoming shared by two operators, and allow each operator to provide the latest advanced connectivity services to the surrounding area.

It was found to be possible to utilise the existing column and provide the latest 4G and 5G communication technologies, subject to a mast extension and

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replacement head-frame. The design of the existing head-frame is not capable of supporting the latest 4G and 5G technologies for two mobile operators. Therefore, a replacement headframe is needed to provide the latest, high capacity 3G/4G coverage, and new 5G capability.

The upgraded site is located in an area where the presence of telecommunications equipment is already established, well separated from residential dwellings and protected assets. The wider headframe is required to ensure that the orientations of the antennas can deliver the required coverage to the target coverage area.

On balance, the alterations to the radio base station will not have a significant detrimental impact on the visual amenity of the surrounding area. The changes at the site will provide enhanced digital connectivity for residents, business, commuters and visitors to the area; thus, providing a high-quality service to its customers and access to the latest technologies whenever and wherever they are. Any limited harm will be outweighed by the benefits associated with providing and maintaining the latest high-quality communications in line with NPPF and the Government's strong commitment to a world leader in 5G. If the challenge is to be met to provide pervasive, affordable, resilient digital connectivity, the challenge is early roll out of 5G.

The proposed increase in antenna height is essential in order for the antennas to be able to reach the target coverage area, to maintain and provide high quality service provision to this part of Rochdale. This will fully meet the national Government's aim of 'ensuring that everyone is connected to the information superhighway' and the national policies set out in the NPPF. If the height of the tower were to be reduced then the antennas would not be able to operate effectively over the surrounding trees, and the dishes would not have a clear line of sight, leading to a degraded service for the operator's customers especially for the higher frequency technologies including the latest 4G technology and new 5G service provision which have lower antenna propagation.

Site selection was progressed in accordance with the applicant's licence obligations, advice in the NPPF and the Code of Practice and represents the least environmentally intrusive, technically suitable, available option. In this case it was possible to upgrade an existing site, which fully complies with the sequential approach.

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

Cornerstone Industry Site Specific Supplementary Information (England) V.5 – 21.03.2022

Registered Address:

Cornerstone Telecommunications, Infrastructure Limited,
Hive 2, 1530 Arlington Business Park, Theale, Berkshire, RG7 4SA.
Registered in England & Wales No. 08087551.
VAT No. GB142 8555 06

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Confirmation that submitted drawings have been checked for accuracy

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Signed:	<i>M. Flaherty</i>	Date:	30/05/2023
Position:	Town Planner	(on behalf of Cornerstone)	

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