

Supplementary Information Form

1. Site Details	
Site Name	Tetrosyl
Site Address	Tetrosyl, Maltings Lane, Castleton, Rochdale, OL11 3DT
NGR	E388372, N410860
Site Number Ref	RCH0003
Site Type ¹	Macro

2. Pre Application Check List		
Site selection		
Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	No
If no, please explain why: The proposed development offers the opportunity for nearby, existing, base stations, and their apparatus, to be consolidated onto a single Icon Tower mast. This will assist in reducing the proliferation of ground-based masts within the local area. As such, the Ofcom database was not used.		
Was the industry site database checked for suitable sites by the operator?	Yes	No
If no, please explain why: As outlined above.		
Pre-application consultation with local planning authority		
Date of written offer of pre-application consultation	N/A	
Was there pre-application contact?	Yes	No
Date of pre-application contact	N/A	
Name of contact	N/A	

¹ Macro or Micro

Summary of outcome / main issues raised:

Due to the specific nature of the proposed development – i.e. a future-proofed, shareable tower, which can accommodate all four Mobile Network Operators (MNO's), plus other wireless network service providers, the search area for this site is geographically limited as it must be situated in close proximity to existing base stations.

As such, it was considered appropriate to proceed directly to application submission, with the support of a robust town planning and environmental justification for the chosen site.

Ten Commitments Consultation

Rating of Site under Traffic Light Model

Red

Amber

Green

Outline Consultation carried out:

In accordance with the Code of Practice (March 2022), the proposed development has been rated as AMBER. Whilst the installation measures 30m in height, it should be acknowledged that the application site is specifically positioned away from residential areas and will sit within a large industrial estate, due north of the A664 (Manchester Road). This area, therefore, already projects a utilitarian context, and is exactly the type of setting in which a telecommunications base station would expect to be seen.

Two existing base stations are situated within the local area, one circa 150m east of the application site, and one circa 400m north of the application site. The proposed tower will offer the opportunity for the equipment on the existing installations to be relocated onto the proposed tower, with the existing installations ultimately being removed from the wider landscape. The presence of these existing towers is a clear indicator that the principle of telecommunications apparatus/towers in this industrial estate has already been established.

This development offers the opportunity to consolidate existing base station equipment, and two ground-based masts, onto one, single, shareable mast, a relatively short distance away from the existing sites.

The rating of AMBER is therefore considered to reflect the proposed scheme.

Summary of outcome / main issues raised:

N/A

School / College

Location of site in relation to school / college (include name of school / college):

N/A

Outline of consultation carried out with school / college (include evidence of consultation):

N/A

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

N/A

Civil Aviation Authority / Secretary of State for the 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

Developers Notice (only required for an application for prior approval)

Copy of Developers Notice enclosed

Yes

No

Date served

2nd February 2024 – Proof of Delivery of Developers Notice included within the application

3. Proposed Development

About Icon Tower Infrastructure Ltd (Icon Tower):

Icon Tower is a UK based company, headquartered in Lichfield, Staffordshire, who provide independent wireless infrastructure sites and equipment and also benefit from being an official Electronic Communications Code ('Code') Operator. It develops infrastructure for **all** networks to use on an open and non-discriminatory basis. Icon Tower is backed by infrastructure investors and has major plans to invest in digital infrastructure to improve mobile and wireless connectivity in both urban and rural areas. On this basis, it provides local communities with the most efficient means to improve connectivity whilst minimising duplicative infrastructure deployments in the future. This will be achieved by allowing other Mobile Network Operators, rural wireless broadband and other essential networks, to use the proposed Icon Tower mast.

Icon Tower does not operate a retail mobile network of its own, but instead gathers Lease Premiums to develop its portfolio of infrastructure for the sole purpose of providing access to all wireless network operators on a shared basis. This is undertaken by Icon Tower Ltd's parent company, AP Wireless. AP Wireless' Investment Portfolio comprises thousands of sites across Europe, Asia, Australia and North and South America.

The four MNOs in the UK (O2, Vodafone, EE, Three UK), together with over 100 other smaller networks, use Icon Tower's infrastructure to deliver a wide variety of services ranging 2G, 3G, 4G and 5G mobile coverage, through to fixed wireless broadband, emergency radio services, broadcast and local wireless services.

Icon Tower is committed to the responsible development of wireless infrastructure. Alternative locations are assessed based on strict Town Planning criteria (visual amenity, impact on the local community), balanced against the physical requirements of the mast (radio plan coverage, backhaul line of sight, power and road access). We operate in accordance with the 'Code of practice for wireless network development in England' (March 2022).

International consultancy Ernst & Young highlighted in a recent report (*"How the tower sector is contributing to the European economy"* – February 2022) that the independent sector *"will continue to play a significant role, underpinning modern digital economies in Europe for the long term"*. Ernst & Young further noted that the *"outsourcing of wireless infrastructure to independent Tower Co's is a growing trend in Europe that is in line with the model prevailing globally. It delivers a number of benefits to mobile network operators (MNO's), the wider wireless sector, and ultimately, the consumer"*. sector has *"a proven track-record in sharing towers with multiple network operators"* and referenced evidence supporting that independent towers (like the one proposed) *"reduces overall cost for mobile operators, helps improve coverage and reduces consumer prices"*.

From a planning perspective, the same Ernst & Young report states the following:

- "The average number of wireless network operators sharing an independent tower is 2.4, compared to 1.3 for MNO-controlled towers. Independent TowerCos make it easier and cheaper to roll out new networks.
- A typical location of a wireless network operator (also point of presence) managed by a TowerCo is circa 40% more efficient than one managed by an MNO, resulting in economic savings of €31b across Europe between 2019 and 2029.
- Greater outsourcing to independent TowerCos could release an estimated €28b of capital, which MNOs can reinvest in their networks, such as to improve coverage and accelerate 5G rollouts. Since 2018, independent TowerCos have helped release around €3.5b in capital via acquisition of various tower portfolios from MNOs.
- While the share of independent TowerCos in Europe has increased in recent years (from 13% in 2014 to 17% in 2018 and 35% in 2021), it remains low compared to other regions (e.g., 90% in the US, 55% in Central and Latin America, and 52% in India). A further increase in Europe would help deliver the benefits of cheaper and better mobile networks.

Supporting this application will therefore not only secure investment in a high-quality infrastructure asset for the community, but also ensure that the mast is deployed by a 'Code Operator' focused on maximising the use of that infrastructure to enable continued and ongoing improvements in connectivity, capacity, and coverage, over the long term. This, coupled with the maximisation of the asset (i.e. opportunities offered to all four major MNO's to share the mast), will result in less duplication of base stations within the Council-area, and across the UK on the whole.

It should also be noted from the outset that, as per GPDO Prior Approval legislation, an Operator must be present on the tower. As such, the proposed development, should it be approved, will

only be implemented when an Operator applies to utilise the tower. The long-term impact of this is that the Icon Tower mast is expected to instigate the removal of existing base stations within the local area, as the Operators relocate their apparatus on to the new, future-proofed and over-engineered tower.

For the avoidance of doubt, the proposed development will not be implemented until at least one Operator applies to Icon Tower to install apparatus on the mast. As such, the deployment of the approved apparatus will not lead to a proliferation of ground-based masts.

UK Government Policy on Mobile Infrastructure Deployment:

Mobile telecommunications networks are now ubiquitous throughout the UK. It is an expectation that an individual can connect and use their mobile phone whenever and wherever they so require. With the advent of new technology, further advances are proposed, and Central Government has seen the telecommunications industry, and 5G, to be at the forefront of economic development.

The expectations are that future telecommunications technology will support government policy regarding digital inclusion; improvements in health and social care; assisting in local economic growth; advancing the development of Smart Cities and supporting innovative uses throughout the transport sector for both personal and public travel.

At the beginning of March 2017 the Department of Culture, Media and Sport (DCMS) issued an updated UK Digital Strategy (UK Digital Strategy) with the goal of ensuring that the UK delivers a “*world-leading digital economy that works for everyone*”. The strategy focuses on seven key strands:

- Building world-class digital infrastructure for the UK
- Giving everyone access to the digital skills they need
- Making the UK the best place to start and grow a digital business
- Helping every British business become a digital business
- Making the UK the safest place in the world to live and work online
- Maintaining the UK government as a world leader in serving its citizens online
- Unlocking the power of data in the UK economy and improving public confidence in its use

The Government has noted within the Digital Strategy that the UK lags behind other similar nations in the delivery of fast, reliable, consistent connectivity for its population, wherever they are in the United Kingdom. In conjunction with the new Electronic Communications Code (2018), the DCMS wishes to make it easier for Operators to upgrade and share their equipment with other Operators to help increase network coverage, capacity and connectivity. The DCMS also sees new technology and improved connectivity and coverage as key to the future growth, both socially and economically, of the UK.

Icon Tower is committed to following through on the Government's aims and to the responsible development of wireless infrastructure. This submission forms part of private new investment where there is a specific requirement for an upgrade to the existing radio base station at this location to enhance coverage in the area.

The Application Site:

The proposed development will be located at Tetrosyl, Maltings Lane, Castleton, Rochdale, OL11 3DT (NGR: E388372, N410860), hereafter referred to as 'the Site'. Figure 1, below, shows the approximate location of the Site. The Site is situated on an area of disused, scrub land, immediately adjacent to the Tetrosyl site, and parallel to Gypsy Lane. To the east of the Site is a national railway line (approximately 35m away), and then, further east still, lies Rochdale Canal (approximately 100m away). The area, on the whole, is made up of industrial and business units, which sit within a large industrial estate, which straddles Rochdale Canal and runs from the A664 (Manchester Road) to the Rochdale Bypass. This area covers approximately 1.25km in length and 1km in width. Within this area are multiple vertical structures, such as chimney columns, and existing telecommunications base stations. These existing vertical features, plus the large-scale industrial estate, create a utilitarian context to the surrounding area. This context will enable the proposed Icon Tower to assimilate into the local area. The application site, must therefore be acknowledged as a good siting solution, where the Applicant's have utilised the manmade-features of the area, i.e. multiple vertical chimneys, existing telecommunications towers, large-scale storage facilities, warehouses and industrial buildings, to provide a utilitarian context to the proposal, and therefore to reduce the visual impact of the development scheme, as far as practicable.

The installation of a new sharable 30m-high monopole will offer a viable solution for multiple Mobile Network Operators. The development will include two headframes, allowing for the deployment of antennas and dishes for **all** Operators, as well as offering easy upgrade opportunities in the future. This differs from the traditional Operator-led base station upgrades which often lead to the removal and replacement of the entire structure. The proposed tower is robust and over-engineered at the point of deployment, to ensure that it is future-proofed and will allow for significant equipment upgrades to be undertaken with ease, without the need to replace the tower itself. This multi-user structure with secure compound and upgraded power supply will enable the opportunity to consolidate existing base station equipment onto a single structure, and in time may lead to the removal of existing infrastructure from the wider landscape.



Figure 1 – Aerial imagery of proposed site (approximate site identified by red marker) (Source: Google Maps 2022)

The Site has been chosen as the most viable town planning solution within the local area which will meet the necessary coverage requirements of the MNOs, whilst simultaneously offering opportunities for new sharers (i.e. Operators that currently have limited presence in the area; plus other wireless service providers, such as Community Broadband firms etc). The long-term goal is to offer a viable, shareable, and future-proofed solution which allows existing base station owners to relocate their existing network apparatus onto a single tower, which has been specifically positioned towards the centre of the industrial estate to ensure that its visual impact on the wider area is minimised, as far as practicable. Furthermore, this location offers an excellent technical and operational solution, thereby improving connectivity, capacity and coverage within the surrounding area, in all directions.

The Site is not located within any Conservation Area, or in close proximity to any Listed Buildings, Ancient Monuments or other Heritage Assets. In addition, the proposed works are not located in close proximity to any designated sites such as SSSIs, SPAs, SACs, or National Nature Reserves.

The proposed site has been specifically selected to ensure that it sits within the large-scale industrial estate, to utilise the pre-existing utilitarian context to the best effect. As outlined above,

the location of the proposed apparatus has been specifically selected to ensure that it sits as far away as practicable from residential properties, and offers the most suitable town planning and environmental solution for this area. It is submitted that the application site, and indeed the proposed development, wholly accords with the existing context of the immediate area, and is appropriate for this location. Figure 2, below, shows the extent of the industrial estate in this area of Rochdale, as well as the location of the proposed infrastructure.



Figure 2 – Aerial imagery of industrial estate (yellow) and the proposed site (approximate site identified by red marker) (Source: Google Maps 2022)

The proposed development offers a shareable structure within an area which already accommodates telecommunications apparatus – i.e. the principle of ground-based masts is established within the local area. The long-term expectation is that the Icon Tower mast will provide the opportunity for the existing Mobile Network Operators to re-site their equipment on to the proposed tower, rather than seek to upgrade their own apparatus, with all of the cost implications that this entails. Figure 3, below, shows the existing telecommunications infrastructure within the wider area. The proposed Icon Tower base station at the application site will be offered to the existing MNO's within the wider area, to relocate their equipment onto the new tower, rather than undertake their own upgrades at the existing locations

As such, the surrounding area will keep pace with technological advances as they occur – i.e. future technologies (6G etc) can be installed directly onto the Icon Tower mast, rather than waiting for the existing Operator mast and/or apparatus to be upgraded, strengthened, and/or increased in height/robustness. This is a clear benefit to the surrounding area and weigh heavily in the favour of supporting the application.



Figure 3 – Aerial imagery of proposed site (in red), and neighbouring base stations (in yellow and pink) (Source: Google Maps 2024)

When the impact of the proposed structure is assessed against the provision of economic, social and environmental benefits that will be brought forward by the proposal, there is considered to be significant favour towards approving the scheme.

The ‘sharing’ of the proposed monopole must be acknowledged. Whilst the proposed mast is taller than those already in situ, it is future-proofed to ensure that MNO’s can share the structure, and upgrade their apparatus accordingly. To ensure a viable ‘sharing’ solution, the apparatus must therefore be taller than those already in situ. The proposed monopole is the slimmest solution available to the operators for deployment. The proposed lattice tower accommodates two separate headframes, to allow all four Operators to potentially deploy apparatus on the tower, and is the slimmest solution available to the Operators for deployment at this location.

Whilst the Applicant’s accept that the height of the installation will result in a visual feature on the landscape, the slimline nature of the development will ensure that the visual impact is reduced as far as practicable, as well as the significant presence of the far-reaching industrial

storage and warehouse units stretching in all directions. When this impact is assessed against the provision of economic, social and environmental benefits that will be brought forward by the proposal, there is considered to be significant favour towards approving the scheme. The justification for the height of the proposed installation is that the sharing capability of the tower will offer the opportunity for the existing, nearby Operators, to relocate onto the proposed tower, and ultimately decommission and remove the existing installations.

In this instance, the existing masts, measure 21m (Three UK) and 25m (MBNL) in height. As they are limited, from a capacity perspective, it is likely that this infrastructure would need to be significantly upgraded to allow for the capacity required to accept either a second-user onto the mast, and most definitely a third, or fourth. Likewise, when technological advances (i.e. the deployment of 5G, 6G, 7G etc) are required, it is likely that the existing apparatus will not be robust enough to accommodate such apparatus, without a significant redevelopment of the tower being necessary. As such, having a taller, more robust alternative to the existing installation offers the Operator's a viable opportunity to re-site their equipment onto the new Icon Tower mast and improve the capacity of their network, whilst simultaneously moving in the direction of travel outlined by the UK Government – i.e. to achieve world class telecommunications networks across the Country.

Whilst it must be acknowledged that the proposed tower offers the opportunity for the existing, nearby Operators to relocate their apparatus onto the new structure, it also must be acknowledged that the same opportunity will be offered to Operators that currently have little or no network presence in the area. Additionally, other wireless networks will also have the opportunity to utilise the new mast to deliver further public benefits to the local community.

The proposed apparatus only serves **one** function – to provide mobile network coverage to the local area. The equipment has no other function. As such, the appearance of the equipment, and the height of the equipment, is dictated by functionality and technical constraints. Indeed, the further relaxation of Permitted Development rights by Central Government in early 2022, shows a clear indication that 30m is now the accepted height for new base stations which are situated outside of designated areas. It should also be noted that this juncture that the associated ground-based equipment cabinets and fencing etc, qualify as outright Permitted Development.

As outlined above, the 'siting' of the proposed development has been carefully selected – set within a large industrial estate, as identified within Figure 2, above. It is considered that the proposal in front of the Council is acceptable, allowing the opportunity to propel the local community to the forefront of the next generation of technologies and continuous network capacity, connectivity and coverage improvements.

It is considered that the best town planning solution has been brought forward as part of this application. Ensuring that continued network improvements are achieved is of vital importance, especially given the modern-day circumstances which have come as a consequence of the Covid-19 global pandemic – with workers now adopting a more hybrid working pattern and leading to an inevitable increase in data consumption in all settings – be it residential, urban, retail, commercial or industrial.

This proposal is future-proofed to allow the mast to be shared by multiple Operators. This is therefore a material planning consideration, and should be given planning weight when assessing the application. It is considered that the proposal in front of the Council is acceptable.

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

Description:

The installation of a new 30m-high telecommunications monopole supporting 2no. headframes to accommodate antennas and transmission dishes; plus ground-based equipment cabinets within a secure, fenced compound; and ancillary development thereto.

Overall Height: 30m

Materials (as applicable)

Tower / mast etc. – type of material and external colour	Galvanised Steel – (unless otherwise suggested by the Local Authority)
Equipment housing – type of material and external colour	Galvanised Steel – (unless otherwise suggested by the Local Authority)

Reasons for choice of Design

In designing this telecommunications installation, the applicants have sought to achieve a balance between the technical requirements of the Operators and minimising environmental impact as far as was practicable. It, however, must be acknowledged that technical constraints heavily influenced the design and limited the scope to alter the appearance of the site to a significant degree.

The application proposes to install a 30m-high telecommunications monopole, supporting 2no. headframes to accommodate antennas and transmission dishes, plus ground-based equipment cabinets within a secure, fenced compound.

The choice of design at the application site is governed by two main factors; the context and visual amenity of the area; and, the technical requirements.

Technical Objective and Technical Requirements

The objective of this site is to ensure that a shareable ground-based mast is available for all Mobile Network Operators to utilise, as well as other wireless networks which may provide sought-after public benefits – i.e. community broadband.

As per the Code of Best Practice on Mobile Phone Network Development in England (2002), the proposed apparatus is placed “*within or adjacent to an existing group of trees*”. The design of the proposed scheme is considered to be simple and unfussy, which aligns with the following, taken from the Code of Best Practice:

- *Placing the mast near similar structures. For example, industrial and commercial premises, road signs and lamp posts;*
- *Placing a mast **within or adjacent to an existing group of trees***
- *Using simple and unfussy designs. Masts which have complex designs are more likely to dominate and be in discord with the landscape and have adverse visual impacts; and*
- *Appropriate colouring. Masts seen against the sky, for example, are best left in their galvanised state or painted pale grey. Against a wooded backdrop a matt green or brown colour scheme would be more applicable (our emphasis)*

By way of background information, in designing a radio base station it is necessary to incorporate certain vital elements and to work around a number of technical constraints. There are three main elements to a radio base station; the cabin or cabinets which contain the equipment used to generate the radio signal(s), the supporting structure that holds the antennas in the air (or fixes them to a building or structure) and the antennas themselves, which emit the radio signals (along with any necessary amplifier or receiver units).

Other elements necessary for the base station to function are the power source (a meter in a cabinet or a generator on sites where a REC supply cannot be utilised), feeder cables that link the equipment housing to the antennas, link dishes and the various support structures, grillages and fixings, often referred to in general terms as “development ancillary to” the base station.

The antenna height is determined by a specialist network radio engineer using specialist software which factors in the area that coverage is required; the relationship between the selected site location and existing cell sites in the linked network; and variances in land levels and elements such as nearby trees or buildings, which can block or weaken signals.

Visual Amenity

The applicants have given due regard in designing all new sites to limit the visual impact through good design. In this instance, the proposed installation is subject to technical and build constraints. That notwithstanding, it is submitted that the appropriate siting and design put forth will mitigate any potential impact on the site and its surroundings to an acceptable level.

To achieve the required Operator coverage and overall network improvements, a 30m-high monopole is required. The proposed installation will be able to accommodate the anticipated level of Operator apparatus at the point of deployment, but also reaching far into the future. This is an important planning consideration and should be acknowledged in any planning assessment.

Whilst the applicants accept that there will be some level of visual impact, when this is compared to the numerous social and economic benefits which will be brought forward via a long-term ‘sharing’ solution, it is considered that the application should be deemed acceptable, and therefore receive Officer support.

The applicants encourage the Council to make a clear distinction between ‘visibility’ and ‘harm’, when assessing this proposal. At 30 metres in height, the structure will be visible. However, being able to see something does not immediately infer that it is either inappropriate or harmful. The applicants submit that, despite the proposed development being visible, it is not harmful, and that the height of the apparatus is solely dictated by its function. The siting of the application site, within a large-scale industrial estate, amongst storage warehouses and established vertical features (such as chimney stacks and existing telecommunications base stations), will assist in reducing the visual impact of the scheme, to the maximum extent. This must be acknowledged by the Council. As outlined in Figure 2 of this statement, the industrial estate, in which the application site sits, is extensive. As such, it is not anticipated that residential amenity will be impacted to any significant level, given that the industrial estate acts as a large-scale buffer zone between the application site and the nearest residential properties. Any achievable views of the proposed infrastructure, will, of course, be framed within wider views of the industrial estate, and all that it encompasses.

As outlined in the General Permitted Development Order, the deployment of mobile phone base stations, up to a height of 30 metres (in undesignated land), is accepted in principle by virtue of

the legislation. This position has been confirmed by the Planning Inspectorate in a number of appeal decisions.

For example, in allowing appeal APP/E2205/W/20/3261389, which proposed the installation of a 20m-high telecommunications monopole and associated ground-based equipment cabinets, the Inspector included the following in their decision notice:

*“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 SP1, SP6 and ENV13 of the Ashford Borough Council Local Plan to 2030 are material considerations as they relate to issues of siting and appearance. In particular, they seek to secure high quality design and to avoid development that would cause loss or substantial harm to the significance of heritage assets. **Similarly, the National Planning Policy Framework is also a material consideration and this includes a section on supporting high quality communications**” (emphasis added).*

In another example, in allowing appeal APP/G4240/W/18/3201704, which proposed the installation of a 20m-high telecommunications monopole and associated ground-based equipment cabinets, the Inspector included the following in their decision notice:

*“**The permission granted under the GPDO is equal to an outline planning permission** and the consideration of the proposed development is limited to its siting and appearance, not the principle of the development” (emphasis added).*

Due consideration has been given to the process and the proposal put forward is the best available option – it both achieves the technical requirements and does not bring unacceptable harm to the character of the area.

It is anticipated that this installation will become an accepted part of the built environment over time – as is the case with the nearby, existing telecommunications installations, and the existing storage warehouses, buildings, and chimney stacks. All of these features would be expected within an industrial estate. It is submitted that the deployment of a telecommunications lattice tower is no different, and is certainly something which would be expected in such a setting.

Whilst it is accepted that the structure will be visible, it is considered that the economic, social and environmental benefits which will be brought forward to the local area outweighs any harm that the proposal may cause.

It is considered, overall, that the design is appropriate to the site and surrounding area and avoids any unacceptable level of impact.

4. Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)* International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines. The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.	Yes	No
5. Technical Justification		
The proposed site is required to provide a 'shareable', local solution which will assist with the delivery of network coverage, capacity and connectivity to the surrounding area. By providing a sharable tower, Mobile Network Operators will have the opportunity to install equipment on this new mast, thereby negating the need to upgrade their own infrastructure within the local area. The proposed mast is robust and is well positioned to assist Operators in delivering future innovations within the telecommunications industry (i.e. 6G etc). Base stations use radio signals to connect mobile devices and phones to the network, enabling people to send and receive calls, texts, emails, pictures, TV and downloads. The base stations are connected to each other (by cables or wireless technology) to create a network. The area each base station covers is called a cell. Each cell overlaps with its neighbouring cells to create a continuous network. There are several variables that determine the size and shape of each cell. As base stations are low-powered radio transmitters they each have a limited range, meaning that they generally need to be located close to (or within) the target area which requires coverage. If a base station is moved too far away from the target area, then it is likely that some sections of the target area will remain without the network services which the Operator aims to provide. High-quality communications infrastructure is essential for sustainable economic growth and that high-speed broadband technology and other communications networks can also play a vital role in enhancing the provision of local community facilities and services. The UK Government recognises the benefits to commerce, industry and the public in general, and so places great emphasis on the benefits of mobile telecommunications to modern life and this is promoted throughout the planning system. The very high level of mobile phone use and ownership within the UK population is a very clear indication of the public's overwhelming acceptance of the benefits of mobile communications, which requires the installation and maintenance of base stations to provide the necessary connection between the mobile phones and the UK telecommunications network. The Planning Inspectorate too has in recent years continually recognised the importance of this issue and cited it in appeal decisions that have overturned the decisions of local authorities		

across the UK where there has been a failure to apply due weight to the value of connectivity to social and economic prosperity in the assessment of applications made for telecommunications development, even in protected or sensitive areas.

As an example, in October 2018 the decision of Winchester City Council to refuse prior approval for the installation of a 17.5m high monopole and associated equipment housing, required to replace an established site being lost from Vodafone's network, was overturned by the Planning Inspectorate (CTIL and Vodafone Vs Winchester City Council, appeal reference APP/L1765/W/18/3197522). Within the decision notice, the Inspector stated that:

*"I attach significant weight to the public benefit arising from the continuation of local service provision.....Having regard to all relevant considerations.. **my findings are that the proposal's public benefit in maintaining and enhancing local telecommunication coverage and capacity would outweigh the limited harm arising to the character and appearance of the area**" (emphasis added).*

In November 2019, the decision of Woking Borough Council to refuse prior approval for the installation of a 20m high monopole and associated equipment housing, which would provide 'in-fill' network coverage for EE, was overturned by the Planning Inspectorate (EE Ltd. Vs Woking Borough Council, appeal reference APP/A3655/W/19/3234027). Within the decision notice, the Inspector stated that:

*"**the mast and antennas are reasonably slim and have an uncluttered form and thus would not be unduly intrusive in a wider panorama.** Accordingly, the visual impact of the proposed base station would be limited, even when the vegetation is not in full leaf. It would also be seen in the context of the existing structures in the immediate area. Therefore, **although the proposed development would not make a positive contribution to the street scene, neither would it be significantly harmful to the appearance of the area**" (emphasis added).*

In June 2021, the decision of Sheffield City Council to refuse their Prior Approval for the installation of a 20-metre-high monopole and associated cabinets was overturned by the Planning Inspectorate (MBNL Limited Vs Sheffield City Council, appeal reference APP/J4423/W/21/3268791). Within the decision notice, the Inspector stated that:

*"Paragraph 80 of the Framework advises that **significant weight should be attached to the economic benefits of providing and enhancing electronic communications infrastructure.** Paragraph 112 advises that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being, and that the expansion of electronic communications networks, including next generation mobile technology, such as 5G, should be supported.*

The proposal would reinstate 2G, 3G and 4G coverage within the area as well as providing 5G coverage, services would collectively increase network capacity and provide ultra-fast and more reliable mobile connectivity, capable of handling ever-increasing data requirements. The development would provide extensive social and economic benefits to individuals, businesses, and public services, including education and healthcare. The Council does not question the social and economic benefits that would result from the proposal but concludes that they do not outweigh the harm found. However, as no suitable alternative sites have been identified, I attach substantial weight to the benefits that would result from the proposal.

In weighing all the above matters, although I have found that the siting and appearance of the proposal would significantly harm the character and appearance of the area, I consider the substantial social and economic benefits of the proposal outweigh the harm identified” (emphasis added).

It is considered that when the balancing method advocated in the NPPF is applied to the proposal, where the need and significant public benefit of ensuring the best available network coverage is provided, especially given the current times in which we find ourselves ensconced in a hybrid-level of remote working, is balanced against the appearance and level of associated visual impact of the proposed site, that the application proposal is positively in favour and is considered wholly appropriate.

The importance of providing continued, and improved, telecommunications network coverage cannot be underestimated, especially throughout the years 2020 and 2021, when the dependence on these networks was been higher than ever before. This dependence has continued into the modern day, as our online shopping, gaming, and social habits have changed, post-pandemic, as well as many people adopting a working-from-home or hybrid work pattern. The proposal before the Council offers a shareable installation which can accommodate the apparatus of multiple Operators, thereby reducing the need for each individual Operator to have their own infrastructure within the local area. As such, one, albeit larger, tower can be deployed to ensure that the necessary apparatus is accommodated to service the local and surrounding areas, whilst simultaneously assisting in reducing the long-term proliferation of ground-based masts – which is aligned to National Planning Policy.

Whilst the Applicants submit that the best town planning solution has been brought forward as part of this application, **clear precedence has been set by the Planning Inspectorate which suggests that this should not be a determining factor, and that the best town planning option does not need to be brought forward.**

In October 2020, MBNL (EE Ltd and H3G UK Ltd) vs Elmbridge Borough Council, appeal reference APP/K3605/W/19/3243927, which has already been discussed within this statement, the Planning Inspector included the following in the Appeal Decision Notice:

“Interested parties indicate that there are alternative sites available for the proposed mast. However, given my conclusion on the main issue it is unnecessary to address the merits of alternative sites. There is no requirement in the Framework or the GPDO 2015 to select the best feasible siting” (our emphasis).

In April 2021, Cornerstone, Telefónica UK Ltd and Vodafone Ltd vs the Council of the London Borough of Havering, appeal reference APP/B5480/W/20/3251086, the Planning Inspector included the following in the Appeal Decision Notice:

“I note the Council’s reservations regarding the appellants’ list of alternative sites, and to that extent I accept that the appeal site has not been shown conclusively to be the least environmentally damaging option possible. But the National Planning Policy Framework (NPPF) does not support that approach. Given that I have found no significant harm, it is unnecessary to consider other alternatives in any more detail” (emphasis added).

In May 2018, CTIL vs Sheffield City Council, appeal reference APP/J4423/W/17/3188962, the Planning Inspector included the following in the Appeal Decision Notice:

*“With regards alternative sites, I have noted the appellant’s submissions within the supplementary information as well as the contention of interested parties regarding the need for fuller consideration of siting. Nevertheless, I am mindful that even if alternative sites were available, **there is no requirement within the Framework or the GPDO for developers to select the best feasible siting where a site as proposed is considered to be acceptable**” (emphasis added).*

For the avoidance of doubt, the applicants do submit that the best environmental and town planning solution has been brought forward as part of this application, with the existing utilitarian context provided by the industrial estate assisting in the deployment of the proposed infrastructure, and, ultimately, reducing any visual impact associated with the scheme. Given the existing context of the industrial estate, and the remote setting of the application, in relation to residential properties, it is submitted that no, better, alternative option could be identified within the local area that would satisfy the necessary technical criteria required for a new base station.

Public dependence on network services and connectivity is ever more apparent, with data consumption at an all-time high. Restrictions on travel resulting from the Coronavirus pandemic (2020-2022), plus three national lockdowns, led to a massive shift from office-based to home-working, from physical, professional and social gatherings to virtual ones, and to unprecedented reliance on online shopping and entertainment services. Since this time, network usage within suburbs has increased dramatically as less people are travelling to town and city centres than during pre-pandemic times. Maintaining and enhancing the mobile networks is of vital national importance, and it was significant that telecoms was designated as “critical work” during that time. It is anticipated that the shift towards homeworking and online services will persist, to a lesser degree, in the future. It is vital that the infrastructure is in place throughout the UK to meet this demand, and the needs of the public. The Applicants submit that this proposal, and the concept of ‘shared’ infrastructure, will assist in the UK future-proofing its mobile networks.

The benefit of having a strong and resilient network has been highlighted since 2020, following the sudden shift in the network requirements, as the demand on the network in residential areas increased with home-working and home-schooling. Research by Ofcom, Online Nation 2020 found that until early that year, online video calling was used much less than other online communication services, with 35% of online adults using online video calling at least weekly in the 12 months to February 2020. However, in May 2020, this had doubled to 71% of online adult consumers using online video calling services at least weekly, with 38% using them at least daily. Research suggests that 7% of adult internet-users used video calling for the first time as a result of the coronavirus pandemic.

The DCM and the RT Hon Oliver Dowden CBE MP highlighted the need for telecommunications companies to support the NHS by providing the connectivity it needed during the Covid-19 pandemic, stating the following in April 2020:

*“Telecoms companies and their workers are making a major contribution to **keeping the nation connected during the COVID-19 emergency**, ensuring that people can stay and work from home” (our emphasis).*

In post-Covid19 world, which oversaw a dramatic shift towards home-working, online shopping and virtual social gatherings, the importance of connectivity for economic, social and physical wellbeing is more apparent than ever before. Infrastructure needs to be in place in order for people to benefit from these services, and it needs to be located in or very close to the areas where the users are located. The proposed development aligns with this.

The Ofcom Connected Nations 2020 UK Report outlined a sharp increase in both mobile and voice data, particularly during the enforced national lockdowns of 2020. The report states that average call volumes and average call duration increased in the week that national lockdown was introduced in March 2020, with mobile hotspots shifting away from city centres to the suburbs and residential areas as restrictions continued.

Significantly, the same report states that the consumption of mobile data saw a staggering rise of 42%, when compared with the previous year. Additionally, the traffic carried in England in June 2020 (during lockdown) exceeded that carried across the whole of the UK (England, Scotland, Wales, and Northern Ireland) in February 2020 (prior to lockdown).

Research by Online Nation 2020 found in April 2020, internet users in the UK spent an average of 4 hours 2 minutes online each day, 37 minutes more each day per online adult compared with January 2020. This emphasises the importance of telecommunications infrastructure in being able to provide internet users with reliable network coverage and capacity to deal with an increasing amount of time online each day.

In his speech at Connected Britain 2020, in September 2020, Digital Infrastructure Minister, Matt Warman, stated the following:

“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”.

The implementation of a third national lockdown throughout January, February, March and April 2021 saw a return of most aspects of life associated with the two previous lockdowns, and the same increases in voice calls and mobile data consumption is expected. Mr Warman also stated the following:

“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”.

Central Governments’ direction of travel is to support the roll-out of 5G technology and this was the case pre-pandemic. This has been emphasised by the Government’s relaxation of Permitted Development rights, allowing Operators to more effectively and efficiently meet the needs of the general public and ever-increasing demand for mobile data consumption. Since its initial roll-out in 2019, Operators have continued to deploy 5G across the UK, largely via the upgrading of existing base stations. Around 12,000 base stations now carry 5G technology. Mr Warman also confirmed that legislative reforms were being undertaken to make it easier for Operators to deploy and upgrade telecommunications base stations.

In May 2021, Mr Warman also wrote to Local Authority Chief Executives in England, making it clear to Local Authority’s that they have a role to play in supporting improved connectivity, and also stating the following:

“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. Last year we agreed a £1 billion Shared Rural Network deal with the UK's mobile network operators to extend 4G mobile geographical coverage to 95% of the UK by 2025" (emphasis added).

Notwithstanding the Covid-19 pandemic, and the increase in network reliance, a look at past data shows that our reliance on mobile networks was increasing year-on-year, prior to 2020. Ofcom's Communications Market Report 2018 provides a figure of 92 million active mobile subscribers in the UK at the end of 2017. It detailed that 78% of adults used a smartphone and that 76% of mobile users were using their devices for web and data access. Figures within the report also confirm that users were spending an increasing amount of time per day using their mobile phone. 68% of participants in the Touchpoints research reported that they "*could not live without*" their mobile phone (rising to 78% among 25-34s). Whilst not included within the research figures, anecdotal evidence suggests that this number is greater still amongst those aged under 18. Given that two years have now passed since this report, it is anticipated that these figures have increased further. All of which points towards the nation's increasing dependency on mobile services and connectivity.

A YouGov survey, in January 2021, adds further support to this, with 67% of those who were at the time working from home during the pandemic confirming that they had been using mobile data, as opposed the fixed-line broadband, agreeing that access to it would be an important factor when choosing where to live in the future. This rises to 76% for 18 to 34-year olds. The survey also confirmed that 44% of one network Operator's data traffic in January 2021 went to streaming services, such as Disney+, and that 45% of 18 to 24 year olds confirming that they are more likely to use their mobile data for browsing social media.

All of the above occur in a domestic setting. There is a clear need and demand for connectivity and capacity, and it is anticipated that telecommunications infrastructure has become, and will continue to become, commonplace in residential and suburban settings, such as the application site.

As recognised by the London Assembly's Regeneration Committee within its "*Digital Connectivity in London*" report, published June 2017, digital connectivity is now widely regarded as the "*fourth utility*", an everyday necessity alongside water, gas and electricity" and also noted that "*mobile broadband is, and will continue to be, an essential complement of fixed broadband*". It is no longer a luxury, but a service essential to modern life.

The deployment of this mast will allow the opportunity for all four major MNO's (O2, Vodafone, EE Three UK) to install existing, and wide-ranging, technologies on site (i.e. 2G, 3G, 4G, 5G), plus future network innovations (i.e. 6G etc), as well as apparatus for other specialist networks; such as the Emergency Services Network (ESN), or local Community Broadband services and other wireless infrastructure services.

The proposal therefore, on a wider scale, would continue to contribute towards the country's connectivity and digital economy future via the provision of continuous network improvement. Furthermore, mobile telecommunications are vital for the UK's economic competitiveness and in promoting social inclusion.

Additional relevant information

The Applicant has taken a sequential approach to identifying the proposed site. It is considered that, given the context of the local area – i.e. utilitarian – which surrounds the application site, that no better, alternative site could be identified.

It is considered that the application site offers an appropriate environmental and town planning solution, whilst simultaneously ensuring the operational parameters of the installation are met. As the industrial estate is considered the optimum location for a new shared tower, the main restriction in identifying a suitable location was the ability to physically deploy the necessary apparatus, as well as the landowner's willingness to allocate a specific area of land from their ownership to accommodate the site. As such, it is considered that the proposal is appropriate to the surroundings and that there is no better alternative location available for a 'shared' network solution which will service the local area.

It should also be noted at this juncture that there is no requirement for the Applicants to submit an alternative site assessment, nor for the Applicants to select the best town planning option as the application site (see page 16, above). The 'principle of the development' is established within The Order and, as such, no regard needs to be paid to the Council's Development Plan. The Applicants' do, however, consider that the application site which has been brought forward offers the best town planning and operational solution for the local area.

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

Environmental Information:

There is no evidence of protected species at this location. The proposal will subsequently not have any potential negative impacts on any sensitive habitats or species.

As far as practicable the proposed development has been designed to keep to a minimum the impact on amenity and the design of the development ensures there would be only a limited impact which would not be sufficient to harm visual or residential amenity. This impact is limited to the visibility of the mid- to upper-section of the monopole, which cannot be screened for operational reasons. All ground-based equipment cabinets and the lower section of the monopole will be screened from medium- and long-range public views, due to the presence of existing warehouses, storage buildings, and industrial fencing which separates individual business premises within the area. These medium- and long-range views are likely to be seen in the same context as the existing vertically engineered apparatus within the industrial estate – i.e. storage units, chimney stacks and existing telecommunications installations. It should also be noted at this juncture, that any views of the proposed infrastructure will be framed within the existing utilitarian context of the industrial estate. This is considered wholly acceptable, and it should be noted that the type of apparatus proposed is often deployed in such settings **without the benefit of any screening.**

Siting and Appearance:

It is considered that the proposal utilises the most suitable design available to meet the technical requirement within the very specific technical constraints. As discussed in Section 3 of this document, this site is required to provide a shareable solution for Operators within a specific geographical area.

The application site is not located within a designated area, and it is considered that the proposal will not bring about substantial harm to the character of the area but will bring benefit to the

public, establishing a shared-user solution facilitated by a neutral host. This, in turn, will result in improved connectivity, capacity and coverage as multiple Operators are able to use the mast. Furthermore, the availability of this shared mast offers the opportunity for the removal of existing ground-based masts, from the local area, as Operators are provided with a taller and more robust structure to accommodate the needs of their networks and their required apparatus. While the applicants do not suggest that the proposal will have no impact, it is considered that when applying the balancing method advocated in the NPPF, the proposal finds itself in favour.

It is important to keep the impact of telecommunications development within any particular area to a minimum, and it is considered that the proposed development achieves this, through good design and the deployment of a shareable, future-proofed structure. When considering the benefits of the proposal, the public benefits which will be brought forward are significant.

The Applicant's consider that any perceived visual impact on the area, or skyline, has been mitigated, as far as practicable, through the best design available within the technical constraints of the site, and that this development will provide excellent public benefits – both in the present, and in the future. It is considered that the impact of the development has therefore been reduced as far as practicable.

In this case, it is suggested that the application of the balancing method advocated in the NPPF, for the provision of communications and connectivity services, in the public interest, be utilised to balance the need for continued connectivity with the potential impact of the site. It is considered that when this balance test is applied to the proposal, where the need and significant public benefit is balanced against the appearance and level of associated visual impact of the proposed site, that the application proposal is positively in favour and is considered wholly appropriate.

This has been emphasised by the Planning Inspectorate on a number of appeal cases where, the Planning Inspectorate has ruled in favour of proposed developments of a similar nature, where this balance was applied. Some recent examples of where this balance was applied by the Planning Inspectorate include appeal cases referenced APP/Q3305/W/18/3206555 and APP/L1765/W/18/3197522. Extracts from these appeal decisions are included below for your convenience:

*"In considering the need for the proposal, Government policy, as set out in the Framework states that advanced, **high-quality and reliable communications infrastructure is essential for economic growth and social well-being. In this respect, I have found that there is a need for the proposal which therefore weighs strongly in its favour.** As I have found that the level of harm relating to this second main issue would be low, that identified need would outweigh the harm in this case"* (emphasis added).

*"I conclude on this issue that despite the less than substantial harm that would be caused, the **public benefits of the proposal would outweigh that harm**"* (emphasis added).

"9. The Government places a high priority on the provision of high-quality communications. The National Planning Policy Framework (the Framework) at Paragraph 112 states, "Advanced, high-quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre

*broadband connections... The Council has commented that service provision would be 'adequate' without the proposal, but **the appellant has an obligation to provide not only appropriate coverage but also capacity for the network. I attach significant weight to the public benefit arising from the continuation of local service provision***" (emphasis added).

*"13. Having regard to all relevant considerations, including national planning policy and the potential availability of alternative sites, my findings are that **the proposal's public benefit in maintaining and enhancing local telecommunication coverage and capacity would outweigh the limited harm arising to the character and appearance of the area**"* (emphasis added).

Whilst each application needs to be assessed on its own merits, the above appeals (along with a growing number of others, many of which are referenced in the preceding sections of this document) indicate a growing trend, based on national policy and guidance, to favour important utilities and infrastructure developments in the wider public interest when the potential harm is outweighed by the important and unavoidable public benefits they provide. Ensuring continued and, ultimately, improved network connectivity, coverage and capacity, for potentially all four major Mobile Network Operators, within the Council's jurisdiction, is considered a major public benefit and a material planning consideration.

The selected siting is considered wholly appropriate. The proposal has been designed specifically to achieve a balance between meeting the technical requirement and avoiding harm to the surrounding area. The application site has been strategically positioned within a large industrial estate, which, as demonstrated in Figure 2 of this document, covers an area 1.25km in length, and 1km wide. As such, only medium- and long-range views of the proposed development, from residential properties, will be achieved, with the positioning of the application wholly intentional and designed to assist in the greatest reduction in visual impact of the scheme.

The selection of a monopole, rather than a lattice tower, has been brought forward to ensure that the size and scaling of the proposed installation is reduced as far as practicable, and it is considered that this monopole design is wholly appropriate for the wider industrial estate.

The antennas cannot be screened for operational reasons as this would result in an attenuation of the signal and reduced network coverage. However, in strategically positioning the proposed installation within a wide-ranging industrial estate, it is considered that the least-impacting site has been brought forward as part of this application.

On balance, this proposed location is considered to be the optimum location in terms of siting and design, with the limited harm it may impose on the surrounding area being outweighed by the provision of continued and enhanced services to the area in the public interest. Given the social, economic and environmental benefits that will be brought forward as part of this proposal, it is not considered that the perceived visual impact of this proposal would outweigh said benefits, and that Officer support should therefore be given. As such, equilibrium will be achieved between technical requirements and environmental impact.

Planning Policy Context:

National Planning Policy Framework (2019) (NPPF)

The National Planning Policy Framework came into force in July 2018 replacing the guidance published in March 2012, was updated again in February 2019, and then had a further update

in July 2021. The NPPF sets out the Government's planning policies for England and how these should be applied.

Paragraph 7 of the NPPF states *"The purpose of the planning system is to contribute to the achievement of sustainable development"*, and in paragraph 10 that *"at the heart of the Framework is a presumption in favour of sustainable development"*. In order to achieve the sustainable development objective, the NPPF has identified 3 overarching objectives (paragraph 8):

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

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

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."

For decision-taking (paragraph 11) this means:

"c) approving development proposals that accord with an up-to-date development plan without delay; or

d) 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:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

Further to this, paragraph 38 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 brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area."*

The NPPF directly addresses the need for enhanced wireless communication services, first mentioned in paragraph 20, which states that an LPA's strategic policies must make sufficient provision for:

*"b) infrastructure for transport, **telecommunications** (our emphasis), security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)"*

Leading on from this, paragraph 118 states that “Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. **Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections**”. Again, the proposal is entirely consistent with the aims expressed within the NPPF.

It should be noted that paragraph 120 states that “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”. A certificate of compliance with ICNIRP guidelines is included within this application.

Local Guidance:

Section 70 of the Town and Country Planning Act 1990 as amended requires planning applications and appeals to be determined having regard to the provisions of the Development Plan and other material considerations, and section 38 of the Planning and Compulsory Purchase Act 2004 requires applications and appeals to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

For the purposes of Section 70, the current adopted development plan for Rochdale Borough Council, relevant to the proposal, comprises:

- The Rochdale Core Strategy (Adopted October 2016); and
- The saved policies of the Rochdale Unitary Development Plan (Adopted June 2006).

Policy P1 of the Rochdale Core Strategy (Adopted October 2016) states that high quality design will be required for all new developments.

Policy P3 of the Rochdale Core Strategy (Adopted October 2016) provides similar guidance, stating that all new development are expected to adhere to high standards of design.

It should be acknowledged at this juncture that as both Policy P1 and Policy P3 aim to be applicable to **all** development, they cannot therefore legitimately and accurately be applied to the development of telecommunications networks, and the infrastructure that is required to support them. There are considerable design constraints that dictate the size, scale and form of telecommunications base stations, especially base station towers which are designed to accommodate up to **all four** Mobile Network Operators, plus any other wireless infrastructure provider (such as Community Broadband apparatus, or local radio equipment). As such, it is submitted that the proposed development cannot be accurately assessed against a non-telecoms-specific Local Policy. These design constraints must be acknowledged.

However, it should be acknowledged by the Local Authority that the proposed apparatus only serves **one** function – to provide communication services and mobile network coverage to the local area. The tower has **no** other function. As such, the design and appearance of the equipment, as well as the height of the equipment, is dictated purely by functionality and technical constraints. As outlined within this document, the proposed apparatus has been specifically designed to accommodate all the equipment of all four Mobile Network Operators, all of which will be offered the opportunity to utilise the Icon Tower mast, allowing them to

decommission and remove their own, existing, less-functional, and smaller-capacity ground-based masts which sit within the surrounding area. As such, the deployment of an over-engineered, future-proofed and shareable installation may in fact assist in a net reduction base stations within the Council's jurisdiction.

Only essential apparatus is proposed for deployment. It is therefore submitted that the proposed scheme does indeed meet the threshold for 'high quality design', as per Policies P1 and P3. The innovative design, with two separate headframes, is also considered to satisfy this policy, with such apparatus already deployed within residential areas across the UK (see Figure 4, below). As the application site sits within a wide-ranging industrial area, rather than a residential area, it is considered that the design is both 'high quality' and wholly appropriate for such a setting.

Whilst the apparatus cannot be considered 'attractive', it can also not be considered as 'poorly designed'. It performs a particular function, the effectiveness and success of which is dictated by both height and scale, and, again, this must be acknowledged. Any development, at any location, will have some level of visual impact on the local area. The proposed development is solely designed to provide network coverage and services to the surrounding area – as such it follows that the visual impact of the scheme will be on the immediate area in which it sits. As outlined within this statement, the application site has been selected specifically to reduce any associated impact of the proposed infrastructure. Given that similar infrastructure has been deployed in close proximity to residential housing, it is considered that the surrounding utilitarian context of the industrial estate, in which the application site sits, offers the setting in which one would expect to view such apparatus.



Figure 4 – Aerial imagery of a 30m-high tower deployed at Century Mill, George Street, Farnworth, BL4 9QW and approved by Bolton Council in 2022 (Source: Applicants drone imagery)

The deployment of the telecommunications infrastructure to provide a very specific service is unavoidable, as without it, there can be no network. Therefore the assessment that must be undertaken is clear – do the public benefits of deploying a shareable, future-proofed and over-engineered installation, which can accommodate all four Mobile Network Operators, and therefore provide the latest technological services (2G, 3G, 4G, and 5G) to the local area, outweigh any visual impact that the proposed development may cause. The Applicants submit

that, in this instance, the multiple social, economic, and environmental which will be brought forward as part of the proposed development, certainly outweigh any associated visual impact.

As per Policies P1 and P3, developments are **not** required to avoid any and all visual impact, but to ensure that high quality design is brought forward. The proposal achieves this, as demonstrated in Figure 4. As such, the Applicant considers that this proposal satisfies Policies P1 and P3.

Policy DM1 of the Rochdale Core Strategy (Adopted October 2016) outlines the Council's expectations for '*General development requirements*'. In a similar fashion to Policy P1 and P3, of the same document, the Local Authority expect to see 'high quality design' for all development brought forward. The Applicants, as outlined above, consider that the proposed scheme is in full accordance with this requirement.

Policy DM1 is made up of 13 separate bullet points (a-m). It is submitted that points d, e, f, h, i, j, k, l, and m, are not relevant to the proposed development and should therefore form no part of the Local Authority's assessment of this application.

In terms of point a., which states that development proposals should take the opportunity to '*enhance the quality of the area*', it is submitted that this is wholly subjective. The Applicant's do however, submit that their long-term strategy for this area is clear – they are providing a single, shareable installation which can accommodate all MNO's, plus other wireless service provider infrastructure. This will therefore negate the need to have multiple ground-based installations within the surrounding area, many of which are sole- or dual-operator hosts and are limited in terms of upgrading capacity. Consequently, the deployment of a single, shareable installation will enable the provision of the most modern network connectivity, capacity and coverage for all Operators. Additionally, the future-proofed nature of the scheme will ensure that Operators can keep pace with technological advances and complete upgrades quickly and effectively, without the traditional strengthening issues associated with supporting infrastructure which may have been in situ for the last 20 years. It is submitted that offering a single, shareable solution for all Operators, will in fact, *enhance the quality of the area*, by leading to a reduction in ground-based masts.

Point g. of DM1, relates to service provision. It is submitted that '*service provision*' is the one and only function of the proposed development – offering MNO's the opportunity to share a single, future-proofed tower, thereby negating the need to maintain their own independent network sites. It is wholly possible that, should the proposed infrastructure be approved, and the tower deployed, that the services provided from it could include Telefonica O2, Vodafone, Three UK, EE, the Emergency Services Network, fixed wireless community broadband apparatus, as well as broadcast and local wireless services. As such, it is considered that the level of service provision, provided by the proposed development, is exceptional. This should be acknowledged by the Local Authority, and should be given significant planning weight in determining the application and making the balanced assessment of benefits vs harm.

The Council's policy is clearly supportive of improvements in telecommunications networks and recognises the need to support business and domestic needs. This is particularly relevant when assessing the proposal before the Council. The proposed development offers a shareable and future-proofed solution which can accommodate up to **all four** major Mobile Network Operators, plus other Wireless Infrastructure users. As such, this ground-based mast, whilst a robust, and high-quality piece of apparatus, may assist in reducing the number of ground-based masts within the local area, thereby reduction the proliferation of base stations within the Council's jurisdiction, whilst also offering a '*one-stop shop*' to all Operators and their future needs.

As outlined within this statement, existing 21m-high and 25m-high installations are already in situ within the wider landscape, both within 400m of the application site. Whilst the proposed development is taller than these existing installations, the Icon Tower mast is over-engineered and future-proofed at the point of deployment. As such, this offers the opportunity for either, or both, of the existing Operators within the local area to re-site their equipment onto the Icon Tower infrastructure, thereby reducing their financial exposure to maintaining and upgrading these installations, instead passing the onus, and responsibility, onto Icon Tower.

Furthermore, other MNO's, who currently do not have a service presence within the local area, will also be given the opportunity to install equipment on the proposed Icon Tower, ensuring that their network presence within the local area is increased – thereby providing social, economic and environmental benefits to the surrounding community.

The long-term vision of the mast is to accommodate all interested users and enable technological upgrades to be undertaken without the need to amend the host structure, as is often the case with traditional base station upgrades. The proposed tower, once deployed, will a) offer a viable operational and technical solution for Operators; b) will also offer an excellent town planning and environmental solution, as a consequence of good siting and appearance; and c) offer an alternative to the large-scale and expensive upgrading of single-operator base stations within the local area. These three points, combined, all weigh in favour of the proposed scheme, and the Applicants submit that these benefits, plus all the others which will be brought forward as a consequence of the proposal, will outweigh any perceived visual impact within the immediate, and surrounding, area.

It is considered that the proposal satisfies policies DM1, P1 and P3, of the Rochdale Core Strategy (Adopted October 2016). The Applicants are satisfied that the Site is considered the most appropriate town planning and environmental solution available, within the geographically-restricted area. The infrastructure itself is considered to be wholly appropriate for the area, offering an excellent town planning and operational solution, whilst simultaneously meeting the technical and operational needs of the MNOs. This type of infrastructure has been recently deployed within very close proximity to residential properties, as per Figure 4 of this statement, and is now an accepted vertically engineered feature on the local landscape, in a similar fashion to electricity pylons that have been commonplace across the UK, in all settings, for decades. The proposed development is no different, and it is anticipated that it will soon be an accepted part of the built environment.

It is submitted that the industrial estate, in which the application site sits, is wholly appropriate for development's such as the one proposed. Whilst existing telecommunications sites within the immediate area provide a context to the proposed development, it is acknowledged that they are smaller and less robust. This further justifies the need for a more robust, taller installation such as the one proposed. Whilst these installations are 5m- and 9m- smaller, respectively, than the proposed Icon Tower, they are limited in terms of structural capacity, and will remain single-, or dual-, Operator sites until they are removed and replaced, or significantly strengthened / increased in height.

The proposed development offers a viable town planning, operational and technical solution, with the ability to accommodate all four MNO's, plus a plethora of other wireless infrastructure apparatus on to the new tower, at the point of deployment, without being hamstrung by structural incapacity and lack of available space on the mast, as is the case with the existing, local infrastructure.

No conflict has been identified with any other Development Plan policies.

Overall, it is considered the proposal complies with both national and local policy. In terms of national policy, it is anticipated to lead to minimising the number of installations by offering the opportunity to host multiple users, and is specifically designed to provide coverage for a wide range of technologies (2G, 3G, 4G, 5G). This, in itself, is significant, as it offers a long-term mobile network strategy for the local area.

Such long-term strategies are often requested by Local Authorities to enable them to understand how the network will be created within a particular Council jurisdiction. In bringing this proposal forward, Icon Tower are demonstrating a very clear, long-term strategy for Rochdale.

It is considered that the application site offers the best town planning and operational solution in which to achieve this.

Conclusion

In summary, the application is in respect of electronic communications apparatus necessary to accommodate multiple Mobile Operator Networks (MNOs) which will service this area of Rochdale. The proposed scheme is future-proofed and over-engineered, at the point of deployment, to allow technological upgrades to the apparatus to be undertaken with ease, as and when they occur, and may negate the need to implement smaller upgrades on other single- or dual-user infrastructure within the local area. The long-term prospect for this particular area is that, given the opportunity, MNO's may make a financial and operational decision to vacate their existing base stations, and instead relocate on to the proposed 30m monopole tower at the application site.

The benefits to the Operators are clear – they will move on to a more robust structure capable of accommodating all necessary apparatus and they will no longer need to maintain their existing base station, with all of the expense that comes with it.

The benefits to the Local Council are also clear – as a positive bi-product of the deployment of a new tower at the application site may, in fact, result in the decommissioning and removal of existing installations within the surrounding area, resulting in a reduction of ground-based masts; which wholly accords with both National and Local Planning Policy.

It should be re-iterated at this juncture that, only when a Mobile Network Operator applies to Icon Tower to share the mast, will any planning approval be implemented. As such, the Local Authority will not be placed in a position where a new ground-based mast is deployed, with no Mobile Network Operator present on the mast. The application for an Operator to 'share' the Icon Tower mast is likely to instigate the removal of an existing base station within the local area, ensuring that there is no proliferation of ground-based masts within the Council's jurisdiction.

This statement has demonstrated that the proposal is in accordance with local Development Plan policy and national policy set out in the NPPF. In particular, it is a form of development that is specifically encouraged as a matter of principle and in its detail complies with the policy objective of minimising potential environmental impact, being appropriately designed and located, as far as practicable.

In conclusion, the application merits support and there are no material considerations that indicate otherwise.

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Signed	<i>Nick Allan</i>	Date	2 nd February 2023
Position	Town Planner	Company	Dalcour Maclaren
For and on behalf of Icon Tower Infrastructure Ltd			