

Alternative Site Assessment

Icon Tower Ref: RCH0003

Site Name	Tetrosyl
Site Address	Tetrosyl, Maltings Lane, Castleton, Rochdale, OL11 3DT
NGR	E388372, N410860

Alternative sites considered and not chosen:

Site ¹	Site Name and address	National Grid Reference	Reason for not choosing ²
D1 (GF)	Castleton Primary School Melville Street, Trub Castleton Rochdale OL11 2QD	E388668 N410699	This location was investigated for its suitability to accommodate the necessary apparatus. However, given that this location sits outwith the recognised industrial area (as outlined in Figure 2 of the Supplementary Information document), it was considered that this option offered a poorer town planning and environmental option when compared to the application site. As such, this option was discounted in favour of the proposed location.
D2 (GF)	Queensway Trub Castleton Rochdale OL11 2LZ	E388446 N410864	This location was investigated. However, as it is situated closer to Arrow Vale Mill (than the application site is) it was considered that the impact on the heritage asset would be greater than the proposed scheme. As such, this option was discounted.
			An option was investigated at this location. However, as with Option 1, above, the site sits outwith the recognised industrial estate and within the Castleton (South) Conservation Area. This location was

¹ ETS – Existing Telecomm site, ES – Existing Structure, RT – Roof Top, GF – Greenfield, SW – Streetworks

² SP - Site Provider, RD - Redevelopment Not Possible, T - Technical Difficulties, P – Planning
O – Other

D3 (GF)	Caxton Street Trub Castleton Rochdale OL11 2UT	E388430 N410511	therefore considered to offer a poorer town planning and environmental solution, when compared directly to the application site and the development scheme. Given that a 30m-high installation is proposed at the application site (outside of the Conservation Area), it is submitted that a similar 30m-high installation at this location would not be conducive in maintaining and protecting either the Conservation Area or local residential amenity.
D4 (GF)	Bow Street Sudden Castleton Rochdale OL11 2PA	E388532 N410885	As with Option 2, this location was investigated and discounted due to its close proximity to Arrow Vale Mill (Grade II Listed Building). When compared directly to the application site, it was considered that this option offered a poorer town planning and environmental solution.
D5 (GF)	Maltings Lane Trub Castleton Rochdale OL11 2P	E388354 N410673	This location offers a viable operational solution for the local area. However, this option is situated within the Castleton (South) Conservation Area. The Applicant was keen to identify a location which sat outwith the Conservation Area, but also as far away from Arrow Vale Mill, as practicable, without impacting the technical and operational performance of the proposed infrastructure. This option was therefore discounted in favour of the application site.
D6 (GF)	Queensway Trub Castleton Rochdale OL11 2LZ	E388353 N410893	This option sits in close proximity to the application site and would provide the necessary operational requirements for the Applicant. However, in contrast to the application site, any proposed infrastructure at this location would likely impact the day-to-day running of the business/landlord. This option was therefore discounted.

D7 (GF)	Queensway Trub Castleton Rochdale OL11 2LZ	E388539 N410799	As with Options 2 and 4, this location was investigated and discounted due to its close proximity to Arrow Vale Mill (Grade II Listed Building). Inevitably, any infrastructure positioned at this location, at the desired height (30m), would be framed in the same views as the existing chimney stack. It was considered that the proposed development offers a better alternative.
D8 (GF)	Hugo Street Trub Castleton Rochdale OL11 2PJ	E388528 N410628	This location was investigated. However, due to its position within the Castleton (South) Conservation Area, and its close proximity to residential housing, it was discounted in favour of the application site.
D9 (GF)	Castleton Maltings Lane Trub Castleton Rochdale OL11 2PQ	E388324 N410781	An option was investigated at this location, which is circa 110m away from the application site. As such, any infrastructure deployed here would be circa 110m closer to residential housing on Smalley Street, and circa 110m closer to Castleton (South) Conservation Area. This option was therefore discounted in preference of the application site.
D10 (GF)	Castleton Maltings Lane Trub Castleton Rochdale OL11 2PQ	E388489 N411074	This option sits to the north of the application site, and was investigated to ascertain whether or not it could accommodate the necessary infrastructure. Whilst this option offers a suitable operational and technical solution, this site is closer to Arrow Vale Mill. It is therefore anticipated that any 30m-high tower at this location would be framed in the same views (across the landscape) as the 30m-high chimney stack. It was therefore considered that this location

			does not offer a better town planning solution than the application site, and was duly discounted.
D11 (GF)	Castleton Maltings Lane Trub Castleton Rochdale OL11 2PQ	E388264 N410836	As with Option 6, whilst this location would offer a suitable operational and technical solution for the Applicant, it would likely impact on the day-to-day running of the business/landlord. Given that there is a viable alternative, which is also in very close proximity, which offers the same operational and technical solution, without impacting the host's business, then this option was discounted in favour of the application site.
D12 (GF)	Hugo Street Trub Castleton Rochdale OL11 2PJ	E388563 N410633	As with Option 8, this location was investigated and subsequently discounted due to its position within the Castleton (South) Conservation Area. The application site is considered a far more desirable town planning and environmental solution.

Additional relevant information

The Applicant has taken a sequential approach to identifying the proposed site. It is considered that, given the industrial context of the surrounding area, no better, alternative site could be identified for the deployment of a new 30m-high telecommunications tower.

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. It is considered that the proposal is appropriate to the surroundings and that there is no better alternative location available for a new '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. 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, nor the Local policies included within it. 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. It should also be noted at this juncture that, the Applicant's have submitted a GPDO Prior Approval application, seeking the Council's assessment of this development, at this location. As such, only the 'siting and appearance' of the scheme before the Council should be assessed.

As per NPPF guidance, existing structures and buildings were investigated, to ascertain their viability to accommodate the necessary base station apparatus. It should be noted, however, that the buildings within the industrial estate are typically two-storey high, with 'pitched-roofs'. As such, these buildings would not provide the required elevation to offer a viable solution to the Mobile Network Operators, given that a 30m-high tower is proposed to cover this area of Rochdale, nor would they provide the suitable supporting structures capable of accommodating the apparatus (and its load) without considerable strengthening. Even if this strengthening were to take place, as the building's typically only measure two-storey's in height, they would not provide the required coverage across the target area. Further to this, there are no viable existing structures on which to deploy the necessary apparatus. The only tall structure within the immediate vicinity is Arrow Vale Mill (Grade II Listed) which would not be utilised for the installation of telecommunications apparatus due to the impact it would have on the heritage asset itself.

The discounted options, and their locations in relation to the application site, are shown below in Figure 1.

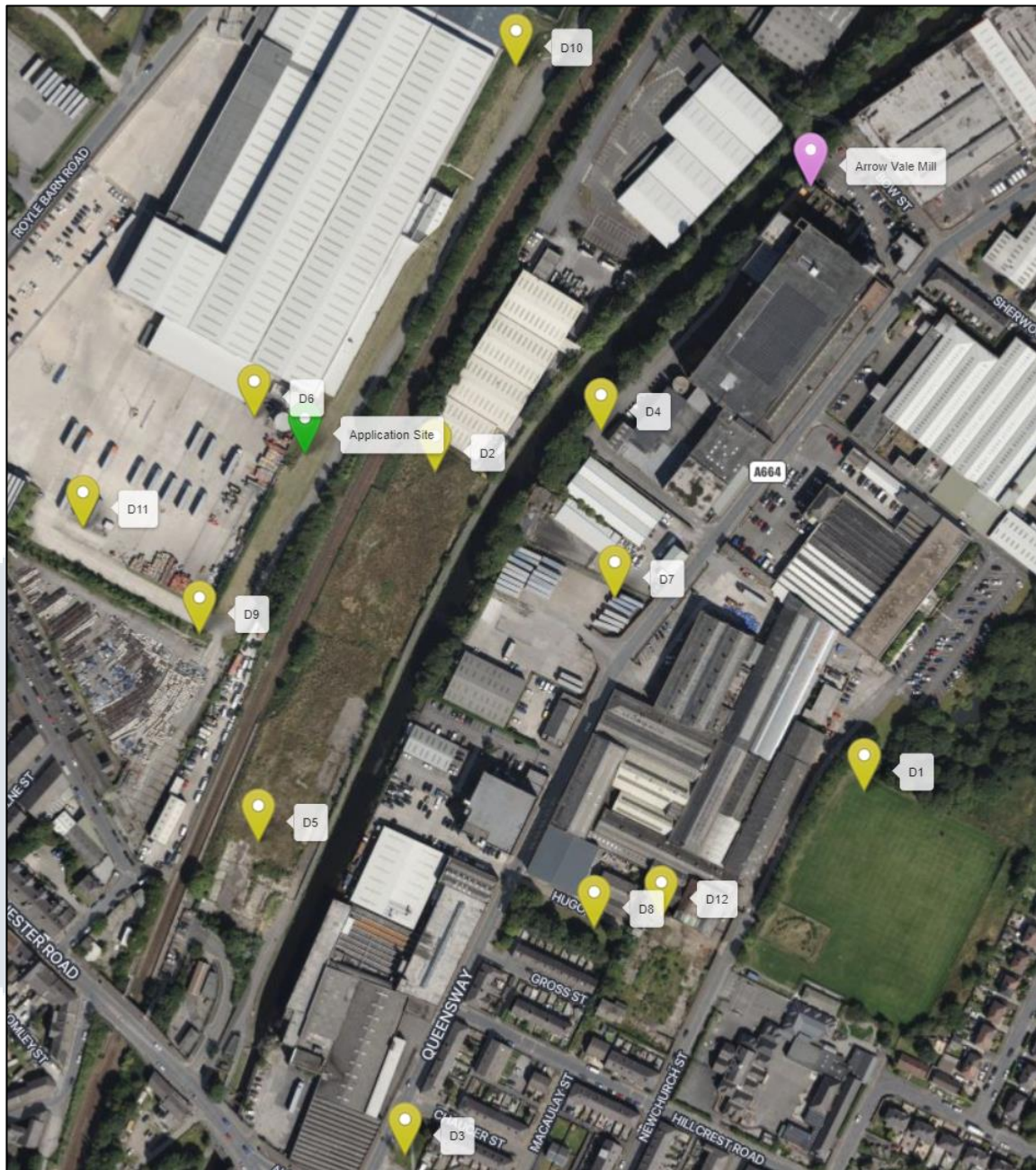


Figure 1 – Application site (Green), Discounted Options (yellow), and Arrow Vale Mill Chimney Stack (pink) (Source: gridreferencefinder.com)

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 of the industrial estate, which stretches for a considerable distance (as shown in Figure 2 of the Supplementary Information document), weighing in the application’s favour. Given the remote setting of the application site, 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.

Contact Details

Signed	Nick Allan	Date	2 nd February 2024
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For and on behalf of Icon Tower Infrastructure Ltd