

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Wardle Football Club	Site Address:	Land at Wardle Football Club, Wardle Road, Wardle, Rochdale, OL12 9JA
National Grid Reference:	E: 391286 N: 415925		
Site Ref Number:	CS_306235_00	Site Type: ¹	Macro

2. Pre Application Check List

Site Selection (for New Sites only)

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

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?		No
If no explain why: Rochdale do not have a publicly accessible mast register.		
Were industry site databases checked for suitable sites by the operator:	Yes	
If no explain why: N/A		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	Yes
Date of pre-application contact:	07/02/2025
Name of contact:	N/A

¹ Macro or Micro

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Summary of outcome/Main issues raised:

On the 07/02/2025, a pre-application consultation letter and drawings of the proposal were sent by email to The Chief Planning Officer at Rochdale Metropolitan Borough Council for comment.

A response was received on 12/02/2025 requesting a fee in order to register a formal pre-application enquiry. In this instance a formal pre-application enquiry was not progressed.

Annual area wide information to planning authority

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

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline of consultation carried out: Pre-application consultation was carried out with the local ward councillors for the Wardle, Shore & West Littleborough Ward (Councillors Adam Branton, John Taylor and Ashley Dearnley), and Paul Waugh MP. Pre-application consultation letters and drawings of the proposals were sent to these parties by email on 07/02/2025.			
Summary of outcome/main issues raised (include copies of relevant correspondence): No responses have been received to date.			

School/College

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Location of site in relation to school/college (include name of school/college): The Old Library Nursery, 106 Wardle Road, Rochdale, OL12 9ER
Outline of consultation carried out with school/college (include evidence of consultation): A pre-application consultation letter and a copy of the proposal drawings were emailed to the above nursery on 07/02/2025.
Summary of outcome/main issues raised (include copies of main correspondence): No responses received to date.

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

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

Developer's Notice

Copy of Developer's Notice enclosed?	Yes
Date served:	04/03/2025
A developer's notice and copy of the proposal drawings were emailed to the owner and lessee on 04/03/2025. Copy of developer's notice and proof of delivery enclosed.	

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3. Proposed Development

The proposed site:

Cornerstone is the UK's leading mobile infrastructure services company. They acquire, manage and own over 20,000 sites and are committed to enabling best in class mobile connectivity for over half of all the country's mobile customers. They oversee works on behalf of telecommunications providers and wherever possible aim to:

- promote shared infrastructure
- maximise opportunities to consolidate the number of base stations
- significantly reduce the environmental impact of network development

As part of Cornerstone's network improvement program, there is a specific requirement for a radio base station at this location to provide upgraded 4G provision as well as new 5G services to the area, ensuring that this area of Wardle has access to the latest technologies.

The proposed installation will allow VMO2 and Vodafone to upgrade and enhance their network services in the area. As 5G is to deliver new technology, so too the infrastructure required is different than that necessary to provide the previous generations of connectivity. Wherever possible, existing installations will be utilised to accommodate the necessary infrastructure. However, in some areas the existing installations are not capable of hosting additional equipment, or are not in locations that would allow the operator to provide coverage to their specific target coverage area.

Due to the technology required for 5G services, the antenna height in many cases must be greater than that for previous generation technology.

The Code of Practice for Wireless Network Development in England acknowledges this:

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

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

69. Operators should seek to share sites where possible, site sharing reduces the number of sites required and network proliferation. However, site sharing means that masts must safely accommodate equipment for all technologies (2G – 5G) from multiple operators. Existing masts may be required to be strengthened or replaced with a larger, lattice-type structure.

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

The Site

The application site is located on land at Wardle Football Club, off Wardle Road in Rochdale. It is to the south west of the playing field area, adjacent to existing metal containers. The land to the north and east is predominantly open green space. Land to the south is open green space with commercial property beyond. Land to the west is in use for recreational leisure/sports with residential properties on either side of Wardle Road.

The application site is not located in any Article 2(3) land and is not listed.

The proposed equipment will be viewed in the context of the existing metal containers and large mature/semi-mature trees on the boundary of the football club.

The site will be shared by VMO2 and Vodafone to provide coverage and capacity for both operators to the surrounding area.

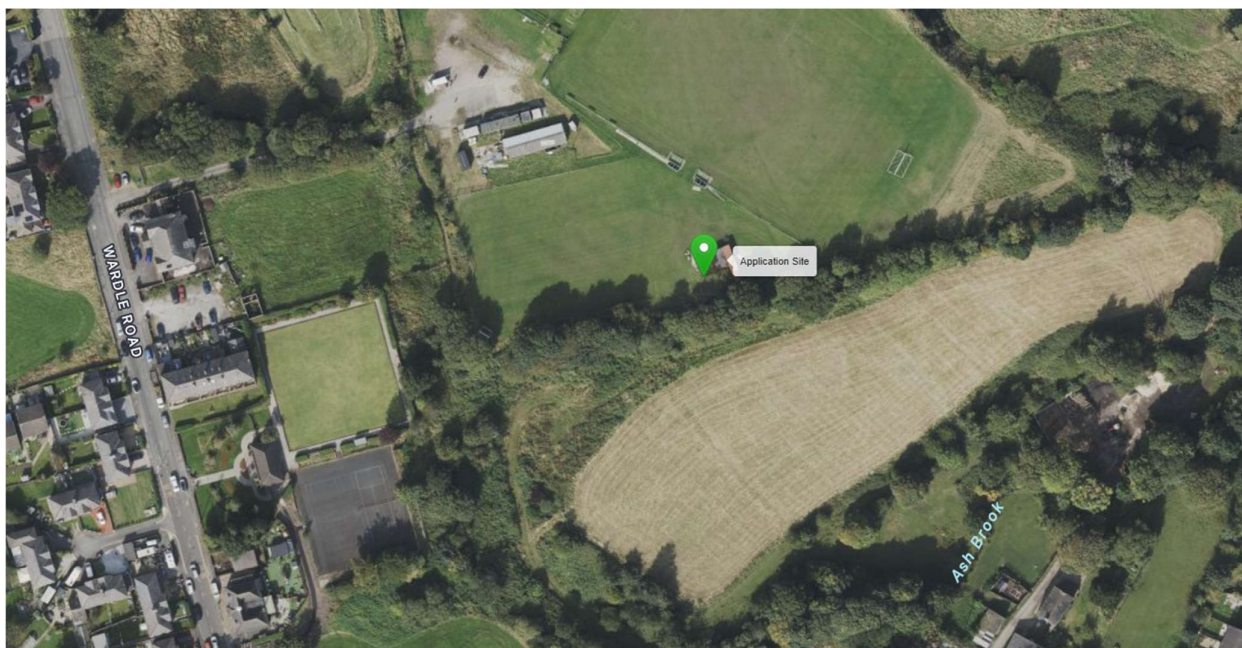


Image 1a: Aerial view of the application site (Source: Grid Reference Finder)

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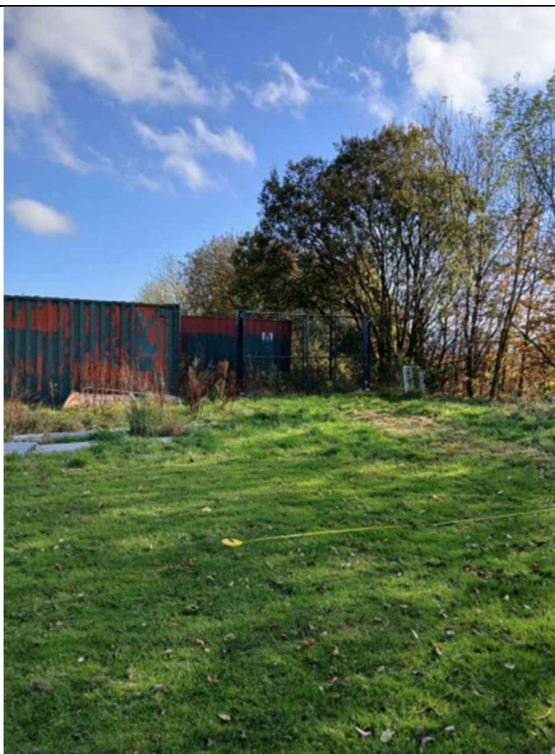


Image 1b: The application site

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

An installation in this location will ensure that the latest high quality 4G and new 5G services are maintained and enhanced in and around this area of Wardle.

The 4G provision allows internet access, video calling, data downstreaming, accessing social media networks and emailing to name just a few of the benefits. Therefore, to maintain high quality indoor 4G services in this area would promote activity in line with the general population demand as the ownership of smart devices increases. 5G will deliver unparalleled speeds and capacity, with significantly reduced latency, which will be needed to deliver numerous innovative applications from autonomous cars to Internet of Things.

A new site in this location will ensure that the security of the latest technologies will be provided into the network, particularly for the data hungry applications of the latest smart hand-held devices. The operators have followed a sequential approach to site finding and have identified this site as part of this process.

4G signals by their very nature (as they carry high data rates) do not penetrate over long distances, just a few hundred metres (5G even less so). This depends on the topography of the land, building clutter and vegetation including trees in the area which can reduce their effectiveness.

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Fact sheets on Radio Planning and Propagation, 5G services and General Background Information have been included as part of this application's supporting documentation for reference.

Type of Structure (e.g. tower, mast, etc): Swann CS5S Lattice Tower c/w Delta Headframe	
Description:	
The installation of a telecommunications base station consisting of a 20m lattice tower supporting 12 no. antennas and 4 no. dishes, together with 6 no. ground based equipment cabinets and 1 no. electric meter cabinet, located within a fenced compound, and ancillary development thereto.	
Overall Height:	20.0m
Metres	
Height of existing building (where applicable):	N/A
Equipment Housing: 1 x VMO2 EFF1 Cabinet	
Length:	850mm
Width:	725mm
Height:	2100mm
Equipment Housing: 2 x EFF2e Cabinets	
Length:	600mm
Width:	650mm
Height:	2000mm
Equipment Housing: 1 x VF V-CAB1	
Length:	660mm
Width:	800mm
Height:	1770mm
Equipment Housing: 1 x VF V-CAB2	
Length:	600mm
Width:	620mm
Height:	1770mm
Materials (as applicable):	
Tower/mast etc – type of material and external colour:	Steel – Galvanised (Grey)
Equipment housing – type of material and external colour:	Steel – Galvanised (Grey)

Reasons for choice of design, making reference to pre-application responses:

It is important that any design solution meets technical requirements in the most environmentally sensitive way. One of the main thrusts of 'Supporting High Quality Infrastructure' in the NPPF is a reduction in the proliferation of telecommunications sites. The Guidance states that operators "should aim to keep the number of radio and telecommunications masts and the sites for such installations to a minimum consistent with

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the efficient operation of the network. Existing masts, buildings and other structures should be used, unless the need for a new site has been justified. Where new sites are required, equipment should be sympathetically designs and camouflaged where appropriate." In this regard, the applicant has adopted a sequential approach to site selection, and it was found that no existing base stations or structures were suitable, available or deliverable as detailed in Section 5, nor were any feasible alternative locations identified. The design of the proposed equipment is the least visually intrusive option available given the level of equipment required for 5G and that the site will be shared by two mobile network operators (VMO2 and Vodafone).

The proposed height at 20.0m is essential to provide sufficient coverage and new 5G services to the target coverage area of Wardle. This is in order to clear the mature trees in the surrounding area and prevent 'clipping'. Any lower and the antennas would not clear nearby trees, and an additional base station would be required in this cell area. This would lead to a proliferation of masts, contrary to national guidance.

The siting of the radio base station is to be positioned adjacent to mature trees and as the lattice tower is constructed of thin struts, allowing light to pass through, it will further assimilate into the surrounding environment. The application site is a considerable distance away from the nearest residential properties and roads. The cabinets are situated within the proposed fencing and will not be visible from public vantage points in the wider vicinity outside of the football club. They have been designed to appear like other statutory undertakers' equipment cabinets. They are small for telecommunications apparatus. The cabinets can be installed under the operators' permitted development rights after the tower is installed but have been included on the plans and in the description in order to remain fully transparent.

It is therefore considered that the proposal before you strikes a good balance between environmental impact and operational considerations. The proposed height and design represents the best compromise between the visual impact of the proposal on the surrounding area and meeting the technical requirements for the site. Taking all matters into account it is considered that this proposal, to provide enhanced 4G and 5G coverage, would not appear out of place within the area.

Technical Information

Health and Safety - including ICNIRP compliance	
An ICNIRP certificate is provided as part of this application.	

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)	Yes	
International Commission on Non-Ionizing Radiation Protection public compliance is determined by		

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mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines. When determining compliance, the emissions from all mobile phone network operators on or near to the site are taken into account. In order to minimise interference within its own network and with other radio networks, VMO2 operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision As part of VMO2's network, the radio base station that is the subject of this application will be configured to operate in this way. All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation, or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference. The telecommunications infrastructure 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.		
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4. Technical Justification

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

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

A mobile phone transmitter is designed to cover a specific area and links its coverage to the next site in the network, creating a patchwork of overlapping coverage 'cells' across the country. So, if a person is on the move, the network will transfer their calls from one site to the next. However, in certain areas there will be gaps between these cells, resulting in a loss of coverage. This can be for a variety of reasons, the most common being topography or buildings which block the path of the signal. The operators' network rollout programme is designed to identify and address these gaps within their coverage and ensure that people can use their phones whenever and wherever they are.

The National Planning Policy Framework states that local planning authorities should not question the need for the telecommunications system, which the proposed development is to support. However, for the avoidance of doubt the proposed installation is required for Cornerstone, to allow VMO2 and Vodafone to improve and enhance their existing 4G coverage and capacity and provide new 5G services to this area of Wardle.

The area within which an installation needs to be established in order to meet the coverage requirement is constrained by the location and extent of the coverage provided by existing installations in the surrounding area.

Further detail regarding the general operation of the network can be found in the accompanying document entitled 'General Background Information for Telecommunications Development'. In addition, fact sheets on Radio Planning and Propagation and 5G services have been attached to this application for reference. This information is provided to assist the local authority in understanding any technical constraints on the location of the proposed development.

5. Site Selection Process

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

In accordance with the licence obligations and advice in the National Planning Policy Framework and the 'Code of Practice for Wireless Network Development in England' the applicant's network rollout team investigated the following siting and design options using this sequential approach to site selection:

- Upgrading their own existing base stations;

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

The applicant's site selection strategy is to keep the overall environmental impact to a minimum. Utilising existing masts is always progressed where it is technically and legally possible and where it is the local planning authority's preferred environmental solution. New sites are only developed where there are no viable or accessible alternatives or it is the local planning authority's preferred approach. The feasibility of the acquisition, build and maintenance of the site also needs to be taken into account.

In accordance with the above sequential approach, there are no existing masts that can be utilised so the proposal is to install a new radio base station in this location to provide enhanced 4G and new 5G service provision for VMO2 and Vodafone.



Image 2: Optimum search area circled in red

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Site Type	Site Address	National Grid Reference	Reason for not choosing site
Existing Telecoms Site (D1)	Rooftop of Egerton House, Wardle Road, Wardle, OL12 9EN	E: 391222 N: 415338	The operators currently host a site in this location. The existing installations in this location are replica GRP flagpoles. 5G antennas cannot transmit efficiently through GRP and therefore the existing installation cannot be upgraded to provide the latest high quality 4G and 5G technologies. The rooftop is pitched and is therefore not of a suitable construction to host pole mounted 5G antennas – these generally need to be fixed to flat rooftops which are structurally capable of significant load bearing. The building is also not of a sufficient height and, notwithstanding the construction issues, even if it was possible to install the required equipment on the rooftop, the 5G antennas would not be capable of providing coverage to the whole target coverage area from this height. As such, this option was discounted.
Greenfield (D2)	Meadows School Car Park, Bridge Street, Smallbridge, Rochdale, OL12 9EN	E: 391266 N: 415336	There is insufficient space in the car park for an installation without affecting the operational viability of the car park. In addition, this location is directly overlooked by a number of residential properties. For these reasons, this option was discounted in favour of the application site, which has sufficient space for an installation and is located a considerable distance from residential properties with trees which will provide screening of the equipment from nearby public vantage points.
Streetworks (D3)	Footway at Wardle Edge, Wardle, Rochdale, OL12 9HB	E: 390967 N: 415598	This location is directly overlooked by a number of residential properties. For these reasons, this option was discounted in favour of the application site, which is located a considerable distance from residential properties with trees which will provide screening of the equipment from nearby public vantage points.
Streetworks (D4)	Footway at Great Howarth,	E: 390861 N: 415605	This location is directly overlooked by a number of residential properties. For these reasons, this option was discounted in favour of the

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	Wardle, Rochdale, OL12 9HF		application site, which is located a considerable distance from residential properties with trees which will provide screening of the equipment from nearby public vantage points.
Streetworks (D5)	Footway at Buckley View, Milnrow, Rochdale, OL12 9DZ	E: 390938 N: 415208	This location is directly overlooked by a number of residential properties. For these reasons, this option was discounted in favour of the application site, which is located a considerable distance from residential properties with trees which will provide screening of the equipment from nearby public vantage points.
Streetworks (D6)	Footway at Croft Street, Smallbridge, Rochdale, OL12 9AE	E: 391311 N: 415333	This location is directly overlooked by a number of residential properties. For these reasons, this option was discounted in favour of the application site, which is located a considerable distance from residential properties with trees which will provide screening of the equipment from nearby public vantage points.
Streetworks (D7)	Footway at Ashbrook Crescent, Wardle, Rochdale, OL12 9AJ	E: 391471 N: 415636	This location is directly overlooked by a number of residential properties. For these reasons, this option was discounted in favour of the application site, which is located a considerable distance from residential properties with trees which will provide screening of the equipment from nearby public vantage points.
Streetworks (D8)	Footway at Great Howarth, Wardle, Rochdale, OL12 9FF	E: 391004 N: 415685	This location is directly overlooked by a number of residential properties. For these reasons, this option was discounted in favour of the application site, which is located a considerable distance from residential properties with trees which will provide screening of the equipment from nearby public vantage points.
Streetworks (D9)	Grass Verge outside 47 Wardle Road, Smallbridge,	E: 391200 N: 415309	This location is directly overlooked by a number of residential properties. For these reasons, this option was discounted in favour of the application site, which is located a

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	Rochdale, OL12 9AB		considerable distance from residential properties with trees which will provide screening of the equipment from nearby public vantage points.
Streetworks (D10)	Grass Verge outside 24 Ashbrook Hey Lane, Wardle, Rochdale, OL12 9AF	E: 391297 N: 415499	This location is directly overlooked by a number of residential properties. For these reasons, this option was discounted in favour of the application site, which is located a considerable distance from residential properties with trees which will provide screening of the equipment from nearby public vantage points.
Streetworks (D11)	Grass Verge at Low Hill, Smallbridge, Rochdale, OL12 9EZ	E: 391111 N: 415427	This location is directly overlooked by a number of residential properties. For these reasons, this option was discounted in favour of the application site, which is located a considerable distance from residential properties with trees which will provide screening of the equipment from nearby public vantage points.
Streetworks (D12)	Land off Wardle Edge, Great Howarth, Wardle, Rochdale, OL12 9HB	E: 390972 N: 415435	This location is directly overlooked by a number of residential properties. For these reasons, this option was discounted in favour of the application site, which is located a considerable distance from residential properties with trees which will provide screening of the equipment from nearby public vantage points.
Streetworks (D13)	Grass Verge at Junction of Wardle Road and Great Howarth, Wardle, Rochdale, OL12 9LG	E: 391164 N: 415637	This location is in a residential area and adjacent to the public highway. For these reasons, this option was discounted in favour of the application site, which is located a considerable distance from residential properties with trees which will provide screening of the equipment from nearby public vantage points.
Greenfield (D14)	Land at Haywood Roto Moulding, Dye House Lane, Smallbridge,	E: 391293 N: 415140	Due to the presence of a large copse of tall, mature trees, the radio planners confirmed an installation in this location would need to be 30 metres in height in order for the antennas to operate effectively over the trees. There are a

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	Rochdale, OL12 9AA		number of residential properties which overlook this option and a 30 metre tower would be visible from these properties. As such, this option was discounted in favour of the application site, where the radio planners have confirmed a tower of a smaller height would be sufficient to provide the required coverage, and which is located a considerable distance from residential properties.
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Image 3: Map of discounted sites (red pins) and application site (green pin) (Source: Grid Reference Finder)

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<https://gridreferencefinder.com?gr=SD9122215338|D1|1,SD9128615925|Application's Site|2,SD9126615336|D2|1,SD9096715598|D3|1,SD9086115605|D4|1,SD9093815208|D5|1,SD9131115333|D6|1,SD9147115636|D7|1,SD9100415685|D8|1,SD9120015309|D9|1,SD9129715499|D10|1,SD9111115427|D11|1,SD9097215435|D12|1,SD9116415637|D13|1,SD9129315140|D14|1&v=r&labels=1>

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

N/A

Land use planning designations:

The site is not located within Article 2(3) land but is located within the Green Belt.

Green Belt issues are addressed later in this statement.

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

National Planning Guidance

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

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

National Planning Policy Framework (December 2024)

The Government's National Planning Policy Framework (NPPF) was published on 24 July 2018 and updates the 2012 version. In February 2019 the NPPF was revised again, with minor alterations to wording relating to housing supply and not any parts relating to telecommunications. The NPPF was updated in July 2021, in order to strengthen sections including requirements on improved design quality, a new requirement for Councils to produce local design codes or guides, an emphasis on using trees in new developments, revised policies on plan-making, removing statues and opting out of PD rights relating to residential conversions. It was most recently updated again in December 2023, in relation to a number of themes including; flexibility for planning authorities in local housing need, clarification of Green Belt boundary alterations and acceptable brownfield development within the Green Belt. It strengthens the importance of building 'beautifully' and respecting the character of an area. It removes the need for annual five-year land supply updates, and protects neighbourhood plans from speculative development for five years. Also, the update encourages community-led and self-build developments and further protects agricultural land in its availability for food production. In December 2024, a further update took place, reversing a number of the previous revisions from December 2023. The update does not change any parts relating specifically to telecommunications development, other than the paragraph numbers.

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The Government's latest thinking continues to strongly support communications infrastructure. The NPPF remains very supportive of high quality communications. Indeed, a whole chapter is dedicated to high quality communications, emphasising the importance that the Government attaches to digital connectivity. Paragraph 119 states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. This wording echoes guidance set out in paragraph 42 of the 2012 version of NPPF. However, it also includes the importance of reliable communications infrastructure for both economic growth and social well-being.

The NPPF continues to support the expansion of electronic communications networks at paragraph 119. It notes that policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time. The economic and social benefits of providing high quality and reliable communications infrastructure are well documented and can be found later in this Supporting Information Statement.

The NPPF supports the expansion of telecommunications:

"Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G)..." (para. 119).

Paragraph 120 of the NPPF sets out the requirement to minimise the number of installations consistent with the efficient operation of the network and also includes being consistent with the needs of consumers and providing reasonable capacity for future expansion.

Paragraph 123 of the NPPF retains guidance from a previous NPPF version which relates to local planning authorities determining applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.

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

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

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

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

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

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

Code of Practice for Wireless Network Development in England

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

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

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

Unlike previous iterations this Code of Practice has been led by the Department for Digital, Culture, Media and Sport (DCMS) and developed in collaboration with representatives of the mobile network industry, other government departments and public bodies, local planning authorities, and protected landscapes. This document replaces the previous Code of Best Practice on Mobile Network Development, which was published in 2016 and is now published by DCMS.

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

Paragraph 8 of the revised Code acknowledges that connectivity is vital to enable people to stay connected and that fast, reliable digital connectivity can deliver economic, social and well-being benefits for the whole of the UK. The Code continues to acknowledge that

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

The Government recognises the role of Planning in delivering the digital infrastructure that we need, in a sustainable and well-designed way, especially as households and businesses become increasingly reliant on mobile connectivity.

Paragraph 13 of the Code continues to echo the NPPF guidance in strongly supporting high quality communications infrastructure, which is seen as essential for sustainable economic growth. More specifically that planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technologies (such as 5G) in order to support economic growth across the country.

The CoP sets out 'How wireless networks function.

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

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

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

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

- **Site sharing and use of existing infrastructure:** *make use of existing structures, sites and masts wherever possible to reduce the need for new development. The NPPF states that, when installing mobile infrastructure, the number of masts and sites should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion.*

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- **Consultation with local planning authorities, local communities and other stakeholders:** participate in dialogue with local planning authorities, along with other relevant stakeholders such as the highways authorities, Area of Outstanding Natural Beauty bodies, Historic England, and Natural England, including pre-application discussions, where appropriate. Maintain clear procedures, and high quality communication and consultation with local communities and other interested parties. Operators should agree community engagement with local planning authorities and share information as appropriate (see [Pre-application consultation with local communities](#) below).
- **Standardised and high-quality approach to planning applications, and the notification procedure:** provide standardised supporting documentation for planning applications (where appropriate) within the context of national and local requirements. Ensure planning submissions are of high-quality and provide the necessary evidence to support the application (as per the NPPF).
- **Prompt responses to enquiries:** respond to complaints and enquiries within a timely manner (see Review and Enquiries section below).
- **Siting and Design:** wireless infrastructure should be deployed in accordance with the guidance set out within this Code of Practice. Where appropriate, equipment should comply with the principles set out in the NPPF and consider any local planning policies, including any local and national design codes. When located in protected landscapes and other designated land, the sensitive nature of these areas must be considered.
- **Removal of redundant equipment and site restoration:** ensure that when infrastructure is upgraded, any equipment that is made redundant by the upgrade, such as brackets, is removed to benefit the local environment. Where a whole site is no longer in use, the site should be restored to its original state.
- **Compliance with guidance laid out in the International Commission on Non-Ionizing Radiation Protection (ICNIRP) public exposure levels guidance:** as required by spectrum licences, comply with international guidelines for limiting exposure to electromagnetic fields (EMF) - including, as set out in the NPPF, providing a statement that self-certifies that ICNIRP guidelines will be met with all applications (see [Annex C](#)).

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

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

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- **Information and communication:** ensure that members of the public can access information about any development proposals within their local area. Send communications promptly to an appropriate operator contact (or their representatives)".

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

Siting and Design Principles

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

The Code provides guidance on siting and appearance principles. It sets out several design principles in respect of telecommunications development and acknowledges that the options for design used by an operator will be affected by site conditions including requirements to link the site to the network, landscape features and coverage and capacity requirements. The guidance includes at Para. 22 *'the choice over the site selection and design of equipment is primarily dependent upon the coverage and capacity requirements and technical constraints of a specific location, although operators should make efforts to reduce visual impacts where possible'*.

Para. 23 confirms that there should be a **'presumption in favour of facilitating sustainable network development'** and, as such, operators and local planning authorities, as well as all other bodies involved in the deployment process, should work together to ensure connectivity needs are met and find viable solutions to deployment issues (emphasis added).

Paragraphs 24 - 27 sets out general siting and site selection principles which Operators should consider. The CoP acknowledges at Para. 24 that *'Operators use a range of sophisticated, computer-based planning tools to predict levels of signal strength and coverage from sites for 2G, 3G, 4G and now 5G. Once an operator has identified a requirement for a new cell site, a suitable site needs to be found. Elements that make a site favourable include: having existing or ready access to a power supply, access to fibre optic cables, vehicular access, and, other buildings and development which may provide a level of existing screening. Operators will typically look to upgrade existing infrastructure prior to considering a new deployment, in particular for initial 5G deployment'*.

Para 25 notes that *'When selecting sites for mobile infrastructure, operators should examine local plans and designations for the area, as well as carrying out an in-person site search to*

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identify potential options which meet their requirements. Operators should follow these general siting and site selection principles:

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

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

- **Coverage:** wireless infrastructure needs to provide an appropriate level of coverage over the intended geographical area. This involves ensuring that antennas are elevated sufficiently (often via masts) to provide clear lines of sight for signals.
- **Capacity:** where existing network infrastructure can no longer meet the demand for network capacity in a particular area, additional sites may be required within that coverage area to meet the demand. This is more likely to be required in densely populated areas or areas of high footfall.
- **Backhaul:** the radio access network requires a connection to the core network. Backhaul is sometimes provided by a microwave link, which requires a clear line of sight between the two ends of the link.

Para 27 requires that Local Planning Authorities consider these issues and consider the need for a site within a limited search area alongside the public benefit of improved connectivity. Para. 27 further considers that in general, it should not, therefore, be appropriate for planning authorities to seek wider evidence of alternative sites (beyond that required by the NPPF), unless they consider the proposed development is unacceptable having regard to the relevant material planning considerations

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

- Protecting visual amenity
- Mitigating visual impacts

Para. 29 acknowledges that these factors along with location and the coverage and capacity requirements can influence the type of infrastructure structure that is deployed and

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requires that 'planning authorities should be aware of these constraints when considering proposals. In particular:

- In urban areas, where there is a high level of demand for mobile data, mobile base stations are likely to need to be deployed more densely. In these settings you can expect to see more use of streetwork monopoles and rooftop installations and, in future, we are likely to see a larger number of smaller units (so-called "small cells") deployed on buildings and on street furniture.
- In rural areas, base stations often need to cover wider geographic areas. Operators may need to use tall masts or lattice towers to provide the required coverage. The location of masts can sometimes be dictated by access to transmission links back to the operator's main network and proximity to a power supply. Coverage in some areas can be limited because of the geography, topography and terrain'.

The CoP establishes radio equipment housing (cabinets) principles. The CoP at Para. 30 states that "cabinets protect radio transmitters and receivers, provide the power source for mobile equipment, and are connected to antennas via cables. Equipment cabinets are likely to be needed at most sites. The cabinets must be of sufficient size to facilitate hosting various operating equipment whilst also allowing air circulation to reduce the potential for overheating". The CoP establishes the planning and visual considerations for siting radio housing. These include:

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

Local Policy

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

The Core Strategy is the lead document of the Rochdale Borough Local Plan. It provides an overview of Rochdale's objectives for the whole of the borough. All other plans and policies must fit with the developments laid out in the Core Strategy.

The Spatial Vision for Rochdale Borough in 2028 states:

"To become a prosperous borough: to grow our economy and develop our place through cooperation and partnership, improving the lives of local people. Rochdale borough will be an attractive, vibrant and thriving place where people want to live, work, visit and do

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business. Its population will be more prosperous, better educated and healthier. It will offer locally distinctive towns and places. It will be celebrated for its greenery, water and natural assets (including biodiversity and geodiversity), its sustainable approach to growth, its Pennine character, its success as a business location, its connectivity with Greater Manchester, Yorkshire and beyond, its cultural heritage and its choice of housing. Its wider range of jobs will retain local talent and reduce dependence on outward commuting even more. The borough will be a more desirable place to live in with attractive housing and strong communities. Its urban green spaces will be much improved and the Roch Valley will form the backbone of a green network of urban corridors and countryside where opportunities for regeneration, leisure, wildlife and addressing climate change will have been taken. The Rochdale Canal and Corridor will be a regenerated asset, and rivers and other water features will be a stronger part of the identity of the borough and a better used asset by the local population and visitors. The urban south of the borough will have thriving towns surrounded by attractive, productive countryside. It will have fully capitalised on the proximity of the M62, Metrolink and railway connections to develop its economy and living opportunities in a sustainable way. Langley, Kirkholt, Milkstone and Deeplish, and East Central Rochdale will have been successfully transformed and other communities in Inner Rochdale, Castleton, Central Heywood and East Middleton will be seeing the benefits of regeneration and housing growth. Rochdale town centre will be a regenerated vibrant main centre. Kingsway Business Park will be a nationally acclaimed success. The north of the borough will have attractive housing communities, regenerated urban sites, and a stronger Pennine identity. Its countryside will have a stronger visitor economy and a better managed and more accessible landscape".

Policy SD1 relates to 'Delivering sustainable development' and states "When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work pro-actively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area. Planning applications that accord with the policies in this Local Plan will be approved without delay, unless material considerations indicate otherwise.

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

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

Policy P2 deals with 'Protecting and enhancing character, landscape and heritage'. The policy aims to enhance and protect the borough's unique character which can lead to

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improvements in quality of life and can also help to boost the visitor economy and inward investment.

There are no policies directly relevant to telecommunications development.

Places for Everyone Joint Development Plan

The Places for Everyone Plan is a joint development plan document for nine Greater Manchester districts – Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan. It took effect and became part of the statutory development plan for each of the nine districts on 21st March 2024.

The vision for Greater Manchester is:

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

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

The Plan sets out a number of Strategic Objectives to help achieve its vision. Those relevant to the proposal include:

“Objective 3: Playing our part in ensuring a thriving and productive economy in all parts of Greater Manchester.

Objective 4: Maximise the potential arising from our national and international assets.

We will:

- *Ensure infrastructure provision supports growth in these locations.*

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

We will:

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

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

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We will:

- *Promote sustainable patterns of development that minimise the need to travel and contribute to cleaner air.*

Objective 9: *Ensure access to physical and social infrastructure.*

We will:

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

Policy JP-S1 relates to Sustainable Development. It states that to help tackle climate change, development should aim to maximise its economic, social and environmental benefits simultaneously, minimise its adverse impacts, utilise sustainable construction techniques and actively seek opportunities to secure net gains across each of the different objectives.

Policy JP-P1 relates to Sustainable Places. Although this is a general design policy which was not written with telecommunications development specifically in mind, a number of its aims are relevant to all development including the application proposal. It states that development should conserve and enhance the natural environment, landscape features, historic environment, and local history and culture, and respect and acknowledge the character and identity of the locality in terms of design, siting, size, scale and materials used. Development should respond to the needs of all parts of society, enable everyone to participate equally and independently, provide opportunities for social contact and support, and promote a sense of community. Of particular relevance, point 14. states that development should be well-connected, particularly by digital infrastructure. It acknowledges that this will enable everyone to take advantage of the employment, cultural and leisure opportunities across Greater Manchester and beyond.

Section 10 of the Plan relates to Connected Places. It acknowledges that one of the Greater Manchester Strategy's ten priorities is to deliver an integrated network with world-class connectivity that keeps Greater Manchester moving and that drives prosperity, whilst protecting the environment, improving air quality and transitioning to a zero carbon future.

Para. 10.3 states:

"10.3 – Historically, connectivity has been primarily about transport, but increasingly digital connectivity is fundamental to our lives, enabling us to connect with people irrespective of location, and to access an unparalleled range of learning, employment and retail opportunities."

Para. 10.21 states:

"10.21 - ... The rapid rise in digital demand seems likely to continue, with more services being delivered digitally and ever-increasing data transfers requiring faster, higher-capacity broadband and mobile connections. As the Plan area becomes 'smarter' – utilising data to deliver services more swiftly and efficiently and adopting innovation such as connected and

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autonomous vehicles, artificial intelligence and the Internet of Things... travel patterns will change and digital will increase in importance. As stated in Our People, Our Place: The Greater Manchester Strategy, it is ultimately our ambition for the city-region to be the UK's leading digital city and one of Europe's top five."

Policy JP-C1 relates to an Integrated Network and states that, in order to help deliver an accessible, low carbon Greater Manchester with world-class connectivity, the Plan supports a range of measures, including enabling the provision of high quality digital infrastructure.

Policy JP-C2 relates directly to Digital Connectivity. It states:

"We support the provision of affordable, high quality, digital infrastructure. In making decisions we will support a range of measures, including:

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

In the supporting text of the policy, para. 10.29 acknowledges that digital connections are increasingly important to every aspect of our lives, and states that it is important that everyone can access them so that they can fully participate in society and the economy.

Para. 10.30 states:

"10.30 – Any truly global city will need to have widespread, affordable, reliable, secure and future-proofed digital infrastructure that provides a competitive edge for businesses and support high-levels of social inclusion. This will be essential to capitalise on new innovations... Big data will also enable the city to be managed more effectively. By facilitating home-working, good digital infrastructure can also help reduce the need for travel and therefore help reduce carbon emissions, traffic congestion and air pollution."

Para. 10.31 acknowledges that digital connections will be imperative to the design, development and delivery of future services in the context of an expanding global city.

Para. 10.32 states that it is fundamental that all parts of the city-region have access to world-class digital connections. It recognises that the area suffers from limited access to mobile networks, especially in rural areas.

Para. 10.33 is clear that improving digital infrastructure and ensuring that new development is connected to it is a high priority for the city-region. It states that it will be important that the area is at the forefront of the roll-out of next generation mobile technology, and acknowledges that digital infrastructure will need to adapt and evolve throughout the Plan period to keep up with new digital technologies.

Greater Manchester Digital Blueprint

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The Greater Manchester Digital Blueprint sets out the ambitions and approach to meeting them for the period 2023-2026, with regards to digital connectivity and growth. It identifies five digital priorities and four key strategic enablers, developed in collaboration with stakeholders from across Greater Manchester's digital sector, sharing strategic commitments. It states *"we remain committed to being a digital city-region with a difference. By putting people, the environment and place at the heart of our plans, we aim for a more inclusive and sustainable approach that builds on our greatest assets."*

The main aims of the Blueprint are to better the lives of people living and working in the Greater Manchester region, making them empowered by the opportunities a *"digitally fuelled city-region brings"*, and to use technology and data better to make the city region a greener, fairer and more prosperous place.

The foreword, by Councillor Eamonn O'Brien, states:

"Our 2023-26 Digital Blueprint sets out our priorities for a more digitally resilient and rapidly growing Greater Manchester, so that everyone regardless of age, location or situation can benefit from the opportunities that digital can bring."

The Blueprint targets include having 200,000 people engaged, helping them benefit from the digital world in 2023-24, and achieving a minimum 90% gigabit coverage across Greater Manchester by 2024. In areas where fibre connectivity is difficult, existing mobile networks can be utilised to ensure gigabit connectivity is provided.

One of the priorities identified is *"Creating connected, inclusive, sustainable places"*, and a strategic enabler for this to be met is to extend digital infrastructure. The Blueprint states that the city-region will *"ensure we have world class digital infrastructure that stimulates economic growth and enables the development of our growth zones, across sectors and localities"*.

Greater Manchester Strategy 2021 – 2031

The Greater Manchester Strategy 2021 – 2031 sets out a plan to ensure *"Good Lives for All"* within Greater Manchester, making it *"a great place to grow up, get on and grow old; a great place to invest, do business, visit and study"*. It is accompanied by a three-year delivery plan which will be monitored, revised and reviewed on a regular basis.

The Strategy states:

"We were already on a digital journey, which has been accelerated by the pandemic. As part of our recovery and the progression of Greater Manchester, we will continue to embrace digital technologies and deliver ambitious digital infrastructure plans for our city-region, ensuring our people and places can make the digital shifts required to enable the attainment of our collective ambitions."

The Strategy acknowledges that at the moment, it is not a level playing field for many in the city-region, and it seeks to redress that imbalance head on. One of the main aims of the

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strategy is to drive out digital exclusion, ensuring all sectors of society have digital access and can benefit from the realisation of opportunities. Part of this involves:

"...it will be important to build on the rapid acceleration in digital communication and access to services which has enabled more people to work from home and access a wide range of opportunities without the need to travel."

It is also stated:

"The development of all our places will be underpinned by the extension of our world class digital infrastructure, ensuring businesses and homes are digitally enabled and equipped. We will... strive to address digital exclusion and accessibility in an increasingly digitised society."

Greater Manchester Local Industrial Strategy (June 2019)

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

It aims to put in place the integrated 21st century infrastructure needed for digital driven, clean and inclusive growth, retaining its place as a top 5 city-region for the digital economy in Europe, with full fibre broadband and 5G coverage.

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

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

"...the city-region now aims to upgrade, integrate and future-proof its infrastructure, to create a 21st century city-region with extreme digital connectivity, clean and inclusive growth and – through work with others – improved access to national and global markets... Existing partnerships are working to improve digital infrastructure in the city-region to meet national targets of roll of 5G technologies for most people by 2027".

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

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

To achieve the ambitions of the GM Local Industrial Strategy it identifies actions around 5 foundations of productivity: Infrastructure, Ideas, People, Business Environment and Places. These are noted as being essential attributes of every successful economy. It also identifies

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opportunities grouped under 4 Grand Challenges – Artificial Intelligence and Data, the Ageing Society, Future Mobility and Clean Growth.

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

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

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

The Local Industrial Strategy acknowledges that GM will aim to become one of the best digitally connected city-regions in the UK. It fully supports the maintenance and development of networks, including 4G and 5G.

Greater Manchester Infrastructure Framework 2040

This is a pre-cursor to the GM Infrastructure Strategy. The aim is to focus on developing infrastructure which ultimately improves the lives of all those living and working within Greater Manchester.

The Infrastructure Framework acknowledges a number of key challenges, one of which is digital and the need to provide pervasive, affordable, resilient digital connectivity. The Framework notes that *"Digital technology is increasingly the backbone of the major industries and our daily lives"*.

The Framework goes on to state that approaching 2040, GM will need to be a Smart and digitally ready City Region. To achieve this, and support on-going digitalisation, the region will require resilient fixed connectivity (through fixed fibre) supported by 5G (and subsequent technologies). It will also need to streamline the process for installation of new infrastructure within the street space.

The Framework notes the vision for the GM Infrastructure Strategy:

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

"The Greater Manchester Infrastructure Strategy should seek to:

- o Support the lives and well-being of people, communities and the environment within Greater Manchester.*
- o Be age-friendly and support the economic and social participation of both young and old.*

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- o Support strategically identified growth for parts and communities within Greater Manchester.*
- o Be flexible, robust and meet the existing and future needs of the communities and technological change.*
- o Provide world-class connections and access to opportunity for all.*
- o Provide world-class digital infrastructure which provides a platform for GM to embrace emerging technological and societal changes.*
- o Support a carbon-neutral GM and be economically, environmentally and socially sustainable."*

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

"As the population and employment is due to rise:

o more people will mean more homes and businesses, and more consumers of digital services.

o There will be a growing demand for high-speed, resilient data connectivity to facilitate changing patterns such as shopping patterns moving online, whilst flexible working becomes more prevalent.

Changing workforce:

o More productive, higher skilled, higher paid jobs more specialised and skill activities needs digital infrastructure to support higher skilled industries – which may require increased digital infrastructure.

Environmental Change:

o Improving efficiencies of buildings and appliances. The use of smarter technologies within each infrastructure sector will look to improve efficiencies further."

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

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

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

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

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"New technologies, artificial intelligence and atomisation:

o Improvements in artificial intelligence and atomisation technologies will transform infrastructure sectors and business markets.

o Digital infrastructure will be crucial to supporting future technology and a Smart City Region.

o Embracing digital technology throughout all sectors, geographies and occupations is fundamental to GM's current and future international competitiveness."

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

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

With regards to the Regional Centre if Challenge 8 is to be met to provide pervasive, affordable, resilient digital connectivity the challenge is early roll out of 5G especially in areas where mobile data use is congested such as the Regional Centre.

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

Relevant Government Reports relating to Telecommunications Development

Levelling Up the United Kingdom White Paper 2022

The Department for Levelling Up, Housing and Communities (DLUHC) published the 'Levelling Up the United Kingdom White Paper' on 02 February 2022. Levelling up is a moral, social and economic programme for the whole of government. The Levelling Up White Paper sets out how the Government spread opportunity more equally across the UK.

The 'Levelling Up the United Kingdom White Paper' champions that

'the United Kingdom is an unparalleled success story – a multi-cultural, multi-national, multi-ethnic state with the world's best broadcaster; a vibrantly creative arts sector; a National Health Service which guarantees care for every

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citizen; charities and voluntary groups which perform a million acts of kindness daily; globally renowned scientists extending the boundaries of knowledge every year; entrepreneurs developing the products and services which bring joy and jobs to so many; and millions of citizens whose kindness and compassion has been so powerfully displayed during the COVID-19 pandemic.

But not everyone shares equally in the UK's success. While talent is spread equally across our country, opportunity is not. Levelling up is a mission to challenge, and change, that unfairness. Levelling up means giving everyone the opportunity to flourish. It means people everywhere living longer and more fulfilling lives, and benefitting from sustained rises in living standards and well-being.

This requires us to end the geographical inequality which is such a striking feature of the UK. It needs to begin by improving economic dynamism and innovation to drive growth across the whole country, unleashing the power of the private sector to unlock jobs and opportunity for all. While there are world-leading and enterprising businesses and innovators right across the UK, economic growth and the higher productivity which drives it has been over-concentrated in specific areas, particularly the South East of England. A long tail of low-productivity businesses and places explain why UK productivity growth is too low compared to competitors. It is vital that we preserve and enhance the economic, academic and cultural success stories of the UK's most productive counties, towns and cities. But it is equally critical that we improve productivity, boost economic growth, encourage innovation, create good jobs, enhance educational attainment and renovate the social and cultural fabric of those parts of the UK that have stalled and not – so far – shared equally in our nation's success'.

The 'Levelling Up the United Kingdom White Paper' states that:

'The UK Government has made progress towards spreading opportunity around the country since 2019, alongside mitigating the worst effects of the pandemic, with: • £5bn for Project Gigabit to bring gigabit-capable broadband to 85% of the UK by 2025, and the £1bn Shared Rural Network deal with mobile operators delivering 4G coverage to 95% of the UK by the end of 2025; • five-year consolidated transport settlements amounting to £5.7bn in eight city regions outside London, £5bn of funding for buses and active travel over this Parliament; and £96bn for the Integrated Rail Plan delivering faster, more frequent and more reliable journeys across the North of England and the Midlands;

Levelling up is not about making every part of the UK the same or pitting one part of the country against another. Nor does it mean dampening down the success of more prosperous areas. Indeed, by extending opportunity across the UK we can relieve pressures on public services, housing and green fields in the South East. And levelling up can improve well-being in the South East by

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improving productivity in the North and Midlands. So, it is about the success of the whole country: realising the potential of every place and every person across the UK, building on their unique strengths, spreading opportunities for individuals and businesses, and celebrating every single city, town and village's culture. This will make the economy stronger, more equal and more resilient, and lengthen and improve people's lives. The economic prize from levelling up is potentially enormous. If underperforming places were levelled up towards the UK average, unlocking their potential, this could boost aggregate UK GDP by tens of billions of pounds each year. Levelling up skills, health, education and wellbeing would deliver similarly-sized benefits. Accumulated over time, those gains could easily surpass annual UK GDP. Success in levelling up is about growing the economic pie, everywhere and for everyone, not re-slicing it.

The United Kingdom's Geographical Disparities: Drivers and Potential Policy Approaches What does the economic and social geography of the United Kingdom look like? The UK has larger geographical differences than many other developed countries on multiple measures, including productivity, pay, educational attainment and health. Urban areas and coastal towns suffer disproportionately from crime, while places with particularly high levels of deprivation, such as former mining communities, outlying urban estates and seaside towns have the highest levels of community need and poor opportunities for the people who grow up there. These disparities are often larger within towns, counties or regions than between them. They are hyper-local and pockets of affluence and deprivation may exist in the same district. Indeed, many of the worst areas of deprivation are found in the UK's most successful cities. While change is possible, in some cases, these differences have persisted for much of the last century. And some of the UK's most successful cities – such as Birmingham, Manchester, Leeds, Glasgow and Cardiff – lag behind their international comparators when it comes to productivity and incomes. What are the current and future drivers of geographical disparities? Over the past century, many trends have combined to create the spatial patterns seen across the UK today. Globalisation, technological progress, advances in transport, logistics and power, and the shift from heavy industry to knowledge-intensive sectors, as well as the rise of foreign holidays and shift from technical training to university education, have had a large and lasting impact on the economic geography of the UK. These dynamics of the global economy have benefited the UK overall, improving productivity, increasing wealth and driving up living standards through more innovation and competition. These dynamics, however, have not had the same positive economic and social impacts across the UK. While London and much of the South East have benefited economically, former industrial centres and many coastal communities have suffered. This has left deep and lasting scars in many of these places, damaging skills, jobs, innovation, pride in place, health and wellbeing. What are the factors that will help drive levelling up? Levelling up requires a focused, long-term plan of action and a clear framework to identify and act

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upon the drivers of spatial disparity. Evidence from a range of disciplines tells us these drivers can be encapsulated in six “capitals”.

- Physical capital – infrastructure, machines and housing.
- Human capital – the skills, health and experience of the workforce.
- Intangible capital – innovation, ideas and patents.
- Financial capital – resources supporting the financing of companies.
- Social capital – the strength of communities, relationships and trust.
- Institutional capital – local leadership, capacity and capability

This White Paper sets out that the new policy regime is based on five mutually reinforcing pillars. Firstly, the UK Government is setting clear and ambitious medium-term missions to provide consistency and clarity over levelling up policy objectives. These missions will serve as an anchor for policy across government, as well as catalysing innovation and action by the private and civil society sectors. These missions are ambitions that the UK Government has for all parts of the UK. Delivering on them, while being fully respectful of the devolution settlements, will require close and collaborative work with the devolved administrations. The missions are rolling decade-long endeavours and will be reviewed periodically by the UK Government. One mission relates to:

“Digital Connectivity

Mission: By 2030, the UK will have nationwide gigabit-capable broadband and 4G coverage, with 5G coverage for the majority of the population” (my emphasis.

The White Paper notes the pivotal role that 'Digital Connectivity' has in boosting productivity, pay, jobs, and living standards by 'Growing the Private Sector'.

To help drive these improvements, the UK Government is setting four core missions, spanning living standards; research and development (R&D); transport infrastructure; and digital connectivity.

Para. 3.2.4 of the White Paper states '*By 2030, the UK will have nationwide gigabit-capable broadband and 4G coverage, with 5G coverage for the majority of the population. This mission is focused on improving digital connectivity*'.

The case for 'Digital Connectivity' action states:

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

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businesses and workers have the skills to take advantage of improved infrastructure.

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

The policy programme for 'Digital Connectivity' states:

'In 2020, the UK Government published the National Infrastructure Strategy, committing to providing £5bn in public funding to roll out gigabit broadband to at least 85% of the country by 2025, and subsequently to as close to 100% as possible, working with the private sector. Public investment will target premises that are hardest to reach and which would otherwise not be provided for by the private sector, ensuring no areas are left behind. Gigabit coverage has increased from 10% to over 60% in less than two years. Since 2019, coverage has improved across the UK, and the UK Government anticipates the following additional improvements to be delivered as a minimum by 2025.

The UK Government has also agreed a £1bn deal with mobile operators to deliver the Shared Rural Network programme. This will see operators collectively increase 4G coverage to 95% by 2025. As a result of this collaboration, the vast majority of the UK will soon benefit from improvements to digital connectivity.

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

In 2022, the UK Government will publish the Wireless Infrastructure Strategy. This will review how far the private sector will go to deliver wireless infrastructure – including 5G – across the country, and determine

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whether there are any market failures in places that need to be addressed, and how the UK Government could tackle these.

The West Midlands 5G (WM5G) Testbed started in 2018 with the mission of testing and proving the benefits of 5G to public and private sector productivity, creating jobs and boosting growth. The UK Government has invested £21m over three years, alongside investment from local government and the private sector. By working with local authorities and Mobile Network Operators (MNOs), WM5G has accelerated 5G deployment by over six months, resulting in the West Midlands being amongst the best connected places for 5G in the UK. In addition, WM5G has delivered a number of UK firsts, including a 5G road sensor network, 5G connected ambulance and capsule endoscopy trials, and a 5G application accelerator programme called 5sprinG, which has already upskilled over 400 organisations on the benefits of 5G and allowed over 60 startups to develop new 5G products and services. We must ensure that people have sufficient digital skills to reap the benefits and prosperity arising from the digital economy. In 2020, the UK Government introduced a new digital skills entitlement, giving adults with low or no digital skills in England free access to new digital skills qualifications based on employer-supported national standards. The UK Government continues to work with local leaders to develop Local Digital Skills Partnerships. These collaborative partnerships are now operating in seven regions across England, with an eighth formally launching in Hull and East Yorkshire in early March. The UK Government will work with devolved administrations to consider how best to share the insights and evaluation of the programme to help build digital skills capability across the UK'.

UK Wireless Infrastructure Strategy, April 2023

In April 2023, the UK Government published the 'UK Wireless Infrastructure Strategy'¹, a plan for delivering world-class digital infrastructure which the government identifies as an essential enabler for its 5 priorities of building a better, more secure, more prosperous future for the UK, including growing the economy, and creating better-paid jobs and opportunity right across the country. In her foreword, the Rt Hon Michelle Donelan MP, Secretary of State for Department for Science, Innovation and Technology, provides context for the strategy:

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

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navigation and self-driving buses and taxis.... This is an incredible opportunity; widespread adoption of 5G could see £159 billion in productivity benefits by 2035".

The Future Telecoms Infrastructure Review, 2018 sets out the ambition of the Government for the UK to become a world leader in 5G technology and ensuring world class connectivity for all. This ambition was reaffirmed in the 'UK Wireless Infrastructure Strategy', published in April 2023 which states in the Executive Summary:

"The next decade will see seismic changes both in terms of what wireless connectivity can deliver and how we can use it. The economic and social benefits from these changes promise to be vast, from supercharging growth to accelerating our transition to net zero. But these benefits can only be achieved with concerted action from government, industry, and others".

The Foreword of the 'UK Wireless Infrastructure Strategy' by Julia Lopez MP 'Minister of State for Department for Science, Innovation and Technology' states inter-alia:

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

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

It is this sense of purpose that underpins Project Gigabit, our flagship £5 billion programme to reach hard-to-reach communities across the UK with gigabit-capable broadband. It is complemented by a staggering competition now underway between commercial suppliers to supply Britons with great connectivity.

Extraordinary progress is being made on coverage. When I began my role in September 2021, gigabit coverage was just over 50%. Now, it stands at almost 75%. With £1bn of Project Gigabit's funding now available to suppliers, our contracts are not just delivering better internet but skilled jobs everywhere from Blandford to Berwick. By the end of next year, we hope to have every part of our country under contract.

Which is why the time is right to turn our sights to mobile connectivity, where the same sense of mission is needed to deliver the kind of wireless infrastructure that will transform how we live our lives and run our economy. This is not simply a matter of improving download speeds as people browse the internet on their phones or dial into work calls. It is far more transformative than that'.

The UK Wireless Strategy states that '4G technology revolutionised the way people use their mobile phones. What today is considered normal, a decade ago was ground-breaking. We

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have seen the growth of streaming services, like Netflix and Spotify, and gained constant access to high-quality, user-produced content for free on platforms like YouTube, transformed the way we shop online, travel around cities through access to apps like Uber and Bolt and use public services, such as booking NHS appointments through apps'.

The UK Government in the UK Wireless Infrastructure Strategy' recognises that 'growth in the digital sector is nearly 6 times faster than across the economy as a whole.

Connected Nations Update: Spring 2024

The Spring 2024 update of the Connected Nations report found that mobile coverage remained stable for 4G, with around 93% of the UK landmass predicted to have good outdoor 4G coverage from at least one operator. This area includes nearly all the premises in the UK.

For 5G, this also remained steady, with around 92% of premises being able to get a 5G signal outdoors from at least one mobile network operator.

The Spring 2024 update introduces an interactive report with both the latest and historical data available. This report shows that in Rochdale, 3% of the geographic area still has no 5G coverage. Only 8% of the area has 5G coverage from all operators.

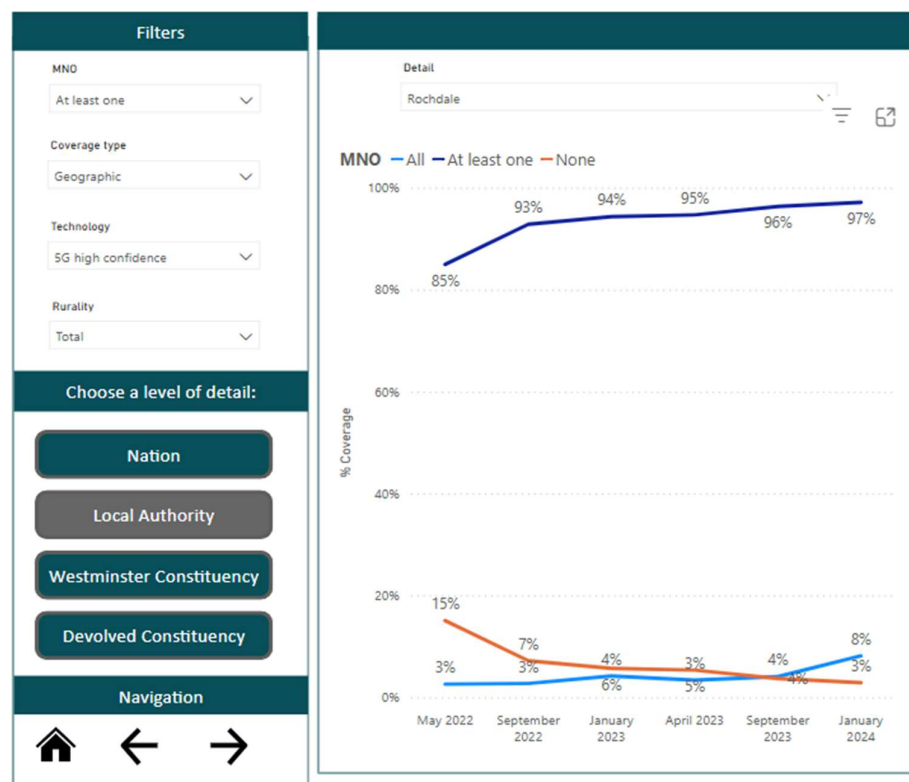


Image 4: 5G coverage statistics in Rochdale (Source: Connected Nations update: Spring 2024 report)

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It is therefore clear that more infrastructure is needed to ensure that local residents and businesses in Rochdale have a choice for which network to choose for mobile services. The proposed tower is shareable and will allow 2 main mobile network operators to provide new and enhanced 4G/5G services to the area.

Connected Nations UK Report 2024

The Connected Nations UK Report 2024 was published on 5th December 2024. It provides updated data on the coverage and usage of fixed broadband and mobile networks within the UK, reporting on the further development of 4G networks and progress on the rollout of 5G networks.

The report states that *"the availability of mobile 5G continues to expand, with mobile network operators (MNOs) coverage ranging between 61% to 79% outside premises. However, 5G coverage where all MNOs are present outside premises remains low, at 38% for our High Confidence level. We continue to see significant differences across the UK, with 5G deployed in 42% of sites in urban areas, compared with 16% of sites in rural areas."*

In relation to 4G technology, the report states:

"4G remains the primary technology for mobile users, reaching outside more than 99% of UK premises and carries 78% of total mobile traffic data. 4G coverage where it is available from at least one MNO has now reached 95% of the UK landmass (delivering early on one of the key targets for the Shared Rural Network programme), with 4G geographic coverage across individual MNOs in the UK rising from a range of 80-87% last year to 88-89% this year. We note the 4G geographic improvements because of the Shared Rural Network programme."

The report also touches upon the phasing out of legacy mobile networks. MNOs have begun phasing out their 3G networks, with two operators having completed the process, and have committed to shutting down their 2G networks by 2033. Over 2 million devices remain reliant on 2G/3G networks, which highlights the need for mobile providers to ensure that their sites are ready for the increased traffic to the more recent 4G/5G technologies.

Online Nation 2022 Report

The 'Online Nation 2022 Report' produced by Ofcom confirms the following:

- UK adults spend almost 4 hours a day online, 3 hours of which are spent on smartphones. (UK young adults (i.e., 18-24 year olds spend approximately 5 hours online and UK adults aged 55+ spend approximately 3 hours online)
- 73% of time spent online/day by UK adults was via a smartphone
- 1 in 5 people use only a smart phone for online access compared with 1 in 10 in 2020

With regards to increased usage of smartphones only for online access the report suggests:

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"More people are using only a smartphone to go online. People were more likely in 2021 than in 2020 to only use a smartphone to go online (21% vs 11% in 2020). There could be many reasons, but this may be because people were spending more time at home in late 2020 and early 2021 than in late 2021, and therefore used a wider range of devices. It may also reflect the larger screen size and better-optimised app functions of many smartphones, making them easier and potentially more cost-effective to use as a sole device for accessing the internet.

The Report goes on to states that:

"In September 2021 73% of the time spent online by UK online adults per day was on a smartphone. UK online adults are also spending slightly more time using tablets than computers, demonstrating that there is a clear preference for using mobile devices to go online. Those aged 25 to 34 spend the highest proportion (85%) of their online time using a smartphone, followed by 35-44s (80%); 15-24s (78%); 45-54s (74%) and those aged 55+ (55%)."

Therefore, without the improved network coverage and capacity that the proposed essential infrastructure will bring, VMO2 and Vodafone's network users living, working and travelling in the local area, and those of the associated MVNOs, will not benefit from reliable mobile digital connectivity when using their smartphones for business, education and personal purposes.

Planning Issues

The following paragraphs set out how the application complies with the NPPF, The Code of Practice on Wireless Development, the Rochdale Core Strategy, the Places for Everyone Joint Plan, as well as the Greater Manchester Digital Blueprint, the Greater Manchester Strategy 2021 – 2031, the Greater Manchester Local Industrial Strategy and the Greater Manchester Infrastructure Framework.

The main issues arising from this prior approval notification are whether the proposed mast and cabinets due to their siting and appearance would result in harm and, if so, whether any perceived harm would be outweighed by the significant social and economic benefits associated with the provision of new service provision attributed to the proposal to enable sustainable development and growth across the borough and meeting the needs of its communities.

The provisions of the GPDO require the local planning authority to assess the proposed development solely on its **siting and appearance**.

The principle of development has been established by the Government when the new permitted development rights came into force in November 2016 and again in April 2022, which enables sites such as this one to be built, with prior approval for siting and appearance being the only matters that the local planning authority can take into consideration.

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

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

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

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

Green Belt

The application site is located in the Green Belt. Part 16 of the General Permitted Development Order does not remove or restrict permitted development rights for telecommunication sites located within defined Metropolitan Open Land areas. The Statutory Instrument establishes the principle of development in such areas and accordingly there is no requirement for the appellant to assess whether the proposed use is and 'inappropriate' use in the Green Belt or present a case setting down 'very special circumstances' to justify the development in line with the requirements of the NPPF.

Accordingly, local plan policies relating to the Green Belt should not be applied to the decision-making process of this application. This is a well-established approach to prior approval applications for telecommunications development within the Green Belt as set down within numerous decided appeals such as APP/R5510/W/15/3133767 where, at paragraph 5, the Inspector states, *'as the appeal relates to a matter concerning prior approval, it is not necessary for me to consider the proposal in the context of the site's location within the Green Belt. Accordingly, I have not considered this policy matter further'.* The same conclusion is reached at paragraph 8 of APP/R5510/W/16/3156200 where the Inspector states, *'the principle of this proposal is not in question and as such the matter of circumstances permitting development in the Green Belt does not apply.'*

In the decision for appeal APP/C3430/A/12/2172974, against the refusal of South Staffordshire District Council for prior approval for a 12 metre high mast and associated development thereto, the Inspector stated:

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"The permission granted under the GPDO is equivalent to an outline planning permission and the Council's considerations of the matter are limited to the effects of the development arising from its siting or external appearance, not the principle of the development. Although the site is within the Green Belt, it seems to me, therefore, that there is no scope to consider whether the scheme represents inappropriate development in the Green Belt, or whether very special circumstances need to be demonstrated to justify the granting of approval for it. On that basis, the Council's first reason for refusal is outside the scope of the matters they were able to consider and should therefore be disregarded."

A recent appeal decision which reinforces the approach that should be taken in the Green Belt in respect of prior approval approvals. In the appeal in the London Borough of Havering, prior approval for a 25m high lattice mast was refused (APP/B5480/W/20/3251086, Land at Havering College of Further and Higher Education, Tring Gardens, Harold Hill, Romford RM3 9ES).

At Para. 8 the Inspector stated *"Although the appeal site is in the Green Belt, the Council has accepted that the proposal benefits from permitted development rights, subject only to matters of appearance and siting, and that consequently the principle of the development is not relevant. I agree with this approach. The development's visual impact on the Green Belt, due to its appearance and siting, is taken into account in the above assessment"*.

The development therefore benefits from deemed planning permission under the GPDO, subject to prior approval by the local planning authority. The provisions of the GPDO require the local planning authority to assess the development solely with regard to siting and appearance, taking into account any representations received.

Siting

The siting of the proposed radio base station has been carefully considered. To this end, the equipment has been located to the far north of the search area, away from the majority of nearby residential properties and at the far south eastern end of the football club, against the backdrop of mature trees on the club boundary. Locating infrastructure close to existing trees is advocated within the Code of Practice and the siting is in line with this guidance.

The existing nearby mature trees to the south of the application site will help the tower and associated cabinets from appearing overly prominent in the surrounding area. Consequently, the visual impact of the proposed radio base station will be minimised within the area and views predominantly restricted to its locality. This is in line with the NPPF, and in accordance with Policy JP-P1 and the design aspirations of Policy JP-C2 of the Places for Everyone Joint Development Plan.

The operator's equipment cabinets are similar to those of other statutory undertakers which are commonplace in urban areas. Their limited height and scale will ensure that these cabinets will not be detrimental to the visual amenity of the area. They will be located behind the compound fencing. Both the equipment cabinets and the compound fencing will only

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likely be visible from within the football club itself and not from the wider surrounds, including nearby residential properties and roads.

In line with the requirements of NPPF, there are no existing telecommunications installations for the operator to share, that would provide the necessary coverage to the target coverage area. Similarly, there are no buildings which are suitable and available that the operator could utilise to operate their equipment. The discounted options are set out in Section 5 above and their reasons for being discounted are fully explained. The application site remains the best available solution for an 'infill' installation to ensure enhanced coverage provision in this area. The comprehensive efforts undertaken during site selection and lack of any more suitable, feasible options is considered material to the assessment of the application proposals.

Appearance

Cornerstone has carefully considered the design of the new proposed structure and are proposing the most sensitive design currently available to provide the necessary coverage, enhanced capacity and new 5G services to the surrounding area. If the column were to be any lower, the antennas would not be able to operate effectively and provide the level of coverage required. As such, this would fail the operators design brief and an additional installation would have to be found, leading to the proliferation of masts contrary to national planning guidance contained in the NPPF.

As the installation will host the equipment of two mobile network operators, VMO2 and Vodafone, it needs to be structurally robust enough to hold the weight of both the operators' equipment at the required height. For this reason, a lattice tower is proposed. The Code of Practice acknowledges the need for a lattice mast in rural areas at Para. 29, stating "*In rural areas, base stations often need to cover wider geographic areas. Operators may need to use tall masts or lattice towers to provide the required coverage.*"

The proposed height at 20.0 metres is essential in order to provide improved 4G coverage and capacity, and new 5G services, to the target coverage area. As acknowledged in the Code of Practice, locating sites close to existing trees is favourable, but the antennas need to be able to 'see' over existing vegetation. The screening afforded by the trees will aid in minimising the visual impact of the proposed installation. This is in full accordance with Policy JP-P1 and the design aspirations of Policy JP-C2 of the Places for Everyone Joint Development Plan.

The equipment is all proposed to be coloured Grey (galvanised). However, the equipment and fencing can be painted any colour, should the Local Planning Authority consider that this would aid in mitigating the visual impact of the proposal.

This is a prior approval application where the principle of this type of development is already established by the Government under the Town and Country Planning (GPD) Order 2015 (as amended) which states that this type of development is permitted subject to the prior approval of the siting and appearance of the installation. This is therefore akin to an outline

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planning permission. There is nothing in the legislation which limits the number of installations that can be erected in a certain locality, nor that they cannot be located in residential areas. Given the nature of the area and the positioning of the proposed equipment, which will be viewed in the context of the existing metal containers and mature trees, the proposed radio base station would not appear prominent nor out of place.

The proposed shared infrastructure will allow two mobile network operators to share the site for their 5G networks, in full accordance with the aims and aspirations of the Greater Manchester Digital Strategy, the Greater Manchester Infrastructure Framework and the Greater Manchester Local Industrial Strategy, as well as the clear aims to improve digital connectivity set out in the Places for Everyone Joint Development Plan.

Lack of Coverage – Material Consideration

The proposed installation is significant to enable reliable enhanced coverage of the telecommunication network, ensuring that Wardle gets the mobile coverage it needs. The current proposals will facilitate the development of an advanced broadband telecommunications infrastructure in line with National Government guidance contained within the NPPF which supports infrastructure especially where growth takes place.

The proposed new radio base station is in full conformity with the policies of the Greater Manchester regional guidance set out in the above policy section. The proposals will ensure the improvement of high-quality communications infrastructure for the community, investing in improved community facilities which meet essential everyday needs, as important as gas and electricity. Indeed, high quality telecommunications is often seen as the fourth utility service.

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

Without this proposed radio base station, the operator's customers would not have access to the latest 4G and 5G technologies, causing buffering and leaving them unable to access high speed internet on their handheld devices. This would be contrary to the aspirations of Central Government which aspires to everyone having access to the superfast highway network wherever they are and being a world leader in 5G.

The proposed installation will help improve the area's economic prosperity, strengthen the urban economy by supporting local businesses to start, grow, adapt and diversify. It will support a better environment for today and tomorrow by reducing the need to travel and in turn minimise carbon emissions. The radio base station will support the delivery of healthcare provision and accessibility by enabling people greater access to online services, NHS appointment reminders, reminders to take medicines, make appointments etc.

Economic and Social Benefits

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

In such instances, as described above, the NPPF supports development that improves the economic, social and environmental conditions in the area. Introducing new and enhanced 4G and 5G services in this area will fully meet this national policy objective.

Mobile connectivity is essential to the future success of the economy. Mobile connectivity is essential to creating a better society. Digital inclusion can help people gain employment, become more financially secure and improve health and well-being. Mobile connectivity is essential to fulfilling the potential of new technologies. Innovations such as artificial intelligence and connected cars will change how we work, spend our leisure time and run our public services.

The enclosed Cornerstone Local Authority Engagement Brochure September 2020, emphasises further the benefits of high quality mobile connectivity including: promoting economic growth by attracting investment from business, which creates jobs and regional prosperity in line with national and local economic strategies; helps local businesses to offer a broader range of services, boosting the local economy; helps local Councils to offer online services such as school admissions and local information for residents supports local companies by facilitating working from home, offers social benefits such as being able to connect with vulnerable family and friends (a life line during COVID 19 lockdown) or contact the emergency services 24/7, and helps local councils to offer online services such as paying council tax bills which provides a more efficient service to name but a few benefits.

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

Paragraph 38 of the NPPF states that:

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

Providing new and enhanced 4G/5G coverage and capacity in this area will fully meet paragraph 38 of the NPPF.

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

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

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

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

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

The Government is determined to ensure the UK receives the coverage and connectivity it needs. To this end, the Government wants to be a world leader in 5G, the next generation

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of wireless connectivity, and for communities to benefit from the investments in the new technology.

The case for 5G is compelling as it brings faster, more responsive and reliable connections than ever before. More than any previous generation of mobile networks, 5G has the potential to improve the way people live, work and travel, and to deliver significant benefits to the economy and industry through the ability to connect more devices to the Internet at the same time, creating the so-called "Internet of Things". This will enable communities to manage traffic flow and control energy usage, monitor patient health remotely, and increase productivity for business and farmers, all through the real-time management of data.

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

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

On the 29th November 2024, Sir Chris Bryant MP wrote a letter to Council Leaders and Council Chief Executives across the UK in support of digital infrastructure deployment. This letter demonstrates that the Government still consider digital infrastructure to be a high priority.

The letter, entitled '*Supporting digital infrastructure deployment in your local area*' confirms the importance of fast and reliable connectivity to our everyday life, as people increasingly rely on their devices to work, learn and stay connected with each other, demand for greater speeds and more reliable connectivity is growing. Better digital connectivity is also key to delivering faster economic growth and increasing social inclusion. The Government is committed to supporting the delivery of next-generation connectivity across the UK by driving towards nationwide 5G coverage by 2030. The letter requests help from Councils across the UK to achieve these goals by prioritising digital infrastructure and focussing on a number of areas that remain a challenge to telecoms investment.

The letter points out that 'early participation from local planning authorities can speed up telecoms deployment' and urges Councils to have early and strategic discussions with mobile operators to move applications more quickly through the planning system and help improve

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mobile coverage and capacity. There is a specific ask in the MP's letter that Councils 'support the deployment of communications infrastructure wherever possible'.

The manufacturing, construction and agricultural sectors were hit particularly hard by the pandemic, and these would benefit significantly from improved connectivity. However, onerous planning rules and loopholes in existing legislation are slowing down the infrastructure upgrades needed to make the most of this mobile revolution in these much-needed industries.

The delay in gaining planning approvals for digital infrastructure is such that the Prime Minister, Sir Keir Starmer, wrote in The Times on 5th December 2024:

*"Good homes need to be supported by good infrastructure... Every road, pylon **and mast** – which connect people to opportunity – must jump through endless hoops, only to be opposed, dragged out, before eventually, if lucky, approved." [emphasis added]*

The proposed installation in this location will allow the operator to provide improved high quality 4G and 5G coverage and capacity to the Wardle area, supporting the Government's aim of 'focusing on ensuring that everyone is connected to the information superhighway' and 'for the majority of the population to have access to a 5G signal by 2027'. This fully meets the aspirations of the NPPF. It also meets the aims of the Places for Everyone Joint Development Plan, the Greater Manchester Digital Strategy, the Greater Manchester Infrastructure Framework and the Greater Manchester Local Industrial Strategy in relation to improving digital connectivity.

A new installation in this location will ensure that the expansion of the electronic communications network is facilitated and that high quality communications infrastructure is provided to the immediate area.

Good connectivity allows people to access a wide range of essential services and a further explanation on some of these key benefits is provided below:

Economic benefits

- Creating more productive and cost efficiencies for businesses
- Businesses offering online services can extend their products to a broader audience
- Local areas and businesses can benefit from tourists and visitors as hotels, attractions, and restaurants can be booked online from anywhere in the world
- Business owners and services like doctors can provide a faster and more cost-effective service by offering both online appointments and ordering
- Digital connectivity facilitates economic growth, something which the Government is keen to progress and promote
- 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high-definition images and video), increased capacity and

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heightened security will also facilitate learning on the job procedures, thanks to technologies such as Augmented Reality (AR) goggles, which, for example, can give the likes of engineers real-time instructions on how to fix a machine on a production line.

Social benefit

- Mobile communications can help people to stay in touch wherever and whenever, which can help improve social wellbeing
- Convenient access to online commerce or businesses
- Contacting emergency services is easier, especially in remote areas
- Giving the ability to manage our personal finances and information 24/7
- Using a mobile wherever you go can provide better personal security
- Having access to social networking sites and applications can keep people entertained with their lifestyles and interests
- Access to real-time transport information or timetables
- Smart meter reads for utilities such as gas or electric
- Contacting local authorities
- Promotion of smarter and productive ways of working. For example, working from home can help minimise commuting which can provide better work and home life balance

Sustainability and Environmental benefits

- Facilitating remote access to services, education, and commerce, reducing the need to travel and in turn minimising carbon emissions.
- Better monitoring and control of energy consumption through climate change technology, smart metering and smart energy grids.
- 5G infrastructure requires fewer heat generating electronic components.
- 5G enabling of the Internet of Things (IOT) sensor deployment can manage and alert us to pollution risks, health hazards and flood risk.
- Provision of smart technologies within the agricultural sector will facilitate more efficient and less wasteful practices helping to limit negative impacts.
- 5G networks allow monitoring of traffic flow resulting in less congestion and better air quality. They also make driverless cars possible; a means of transport that offers better fuel efficiency.
- Smart cities and buildings can rely upon 5G networks to enable buildings and infrastructure to use automated energy saving through better and more efficient lighting, heating, cooling and other operations.

Health benefits

- Support the delivery of healthcare provision and accessibility by enabling people greater access to online services, NHS appointment reminders, reminders to take medicines, make appointments etc.

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- Patients across the country are now becoming accustomed to using remote healthcare services such as NHS 111, virtual GP appointments, and ordering online deliveries of essential medical supplies.
- 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high-definition images and video), increased capacity and heightened security are going to be fundamental in scaling the patient benefits of remote healthcare and keeping medical records secure and private. For instance, trials have shown that connecting ambulance crews to expert resources using 5G allows paramedics to work with doctors and conduct specialist procedures in real time whilst on the road.

Education benefits

- Facilitates access to educational establishment databases or booking systems for securing places for the likes of school dinners, field trips, extra-curricular activities, student/teacher reviews, etc.
- Provides access to school/college/university apps for setting and submitting homework/coursework, ensuring news and notifications are delivered efficiently, and for parent/student/teacher interactions.

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

Education

The relationship between 5G and education is evolving at a massive rate with educators exploring the relevance of Virtual Reality (VR) technologies for education and training. Crucially, VR can support remote learning, allowing students a presence in the classroom even when working elsewhere.

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

Health

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

5G will prove critical in providing the infrastructure required to deliver remote health services over the next decade. By design, 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high definition images and video), increased capacity and heightened security are going to be fundamental in scaling the patient benefits of remote healthcare and keeping medical records secure and private. For instance, trials have shown

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that connecting ambulance crews to expert resources using 5G allows paramedics to work with doctors and conduct specialist procedures in real time whilst on the road.

Summary

Cornerstone is in the process of progressing a suitable new infill site in the Wardle area for a radio base station to ensure reliable mobile digital connectivity is enhanced for residents, businesses and visitors. As part of VMO2's continued network improvement program, there is a specific requirement for a new installation which will provide additional coverage and capacity into the network at this location to provide improved 4G and new 5G coverage and capacity, ensuring that this area of Wardle has access to the latest technologies. The proposed installation will be shared by Vodafone to ensure their customers also have access to high quality, reliable coverage.

The proposed height at 20m is essential in order for the antennas to clear the surrounding trees and be able to reach the target coverage area, to provide high quality 4G and new 5G service provision to Wardle. This will fully meet the national Government's aim of '*ensuring that everyone is connected to the information superhighway*' and the national policies set out in the NPPF, as well as the local policies set out in the Places for Everyone Joint Development Plan, the Greater Manchester Digital Strategy, the Greater Manchester Infrastructure Framework and the Greater Manchester Local Industrial Strategy in relation to improving digital connectivity. If the height of the tower were to be reduced then the antennas would not be able to operate effectively, leading to a degraded service for the operators' customers especially for the higher frequency technologies including the latest 5G technology.

Site selection was progressed in accordance with the applicant's licence obligation, advice in the NPPF and the Code of Practice and represents the least environmentally intrusive, technically suitable, available option.

The social and economic benefits of providing continued reliable and high quality mobile broadband connections including sustainable growth meeting the needs of the population and strengthening global competitiveness. This is fully supported by the NPPF, the Rochdale Core Strategy, the Places for Everyone Joint Development Plan, the Greater Manchester Digital Strategy, the Greater Manchester Infrastructure Framework and the Greater Manchester Local Industrial Strategy. These benefits are strong material considerations which outweigh any perceived loss of visual amenity to the surrounding area.

We confirm that submitted drawings have been checked for accuracy.

Contact Details

Name: (Agent)	Vicky Weston MSc	Telephone:	07591 646 221
	MRTPI		
Company:	Perry Williams Ltd		

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

Cornerstone Industry Site Specific Supplementary Information (England) V.9 – 22.03.2024

Registered Address:

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



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Signed:	<i>V. Weston</i>	Date:	06/03/2025
Position:	Consultant Town Planner	(on behalf of Cornerstone)	

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

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