

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Land At Cinder Farm	Site Address:	LAND AT CINDER FARM, THORNHAM ROAD, ROCHDALE, M24 2SD.
National Grid Reference:	E: 389607 N: 408767		
Site Ref Number:	30905800	Site Type: ¹	Greenfield

2. Pre Application Check List

Site Selection

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	No
If no explain why: It was felt that the industry database was a more up-to-date source of information.		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why:		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	No
Date of pre-application contact:	NA
Name of contact:	NA

¹ Macro or Micro

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Summary of outcome/Main issues raised:

An informal pre-application letter aimed at keeping the planning authority informed was sent to the council and a response was received from officer Aimee Bovaird who voiced concerns about the location in the greenbelt and visibility from the motorway with limited vegetation. The officer also mentioned that discounted options needed to be addressed and highlighted some planning history. I responded to the officer with the following email:

Hi Aimee

Thanks for your response. As this is a 20m mast on non-designated land the application would fall under the prior approval process and therefore inappropriate development in the greenbelt would not be a consideration as the principle of the development has already been established by part 16 of the GPDO. In terms of it being highly visible, there are significant tree screening between the mast and the motorway between 12 and 14m in height with rising land to the near further reducing its visibility in the landscape. This visibility, although limited, does not automatically equate to harm and the wider area has existing vertical infrastructure within the greenbelt so it could be considered to be in keeping with the character of this area.

Full discounts of any mast/site sharing options in the area are in our report which is yet to be submitted. This site is being proposed due to an NTQ (notice to quit) and subsequent decommission of a nearby site. This area is in need of replacement coverage and with commercial and residential development plans nearby it will be in need of greater connectivity in the future which this can help to provide. In terms of the application you have referenced (24/00733/TELE), I do recall reviewing this previously and I believe the refusal was largely due to the perceived affect on a nearby listed building which would not be a consideration for this proposal.

Would you consider that a green colour of the mast to fit in with the existing trees and landscape would be better for this location?

Kind regards

There was no further engagement after this, and we have maintained the galvanised steel design. However, if the local authority did believe that a green colour to the lattice mast would be preferable then this could certainly be accommodated.

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Annual area wide information to planning authority

Has annual area wide information been provided?	No
If no explain why:	
Summary issues raised: “Cornerstones commercial relationship with Telefonica has changed, effectively increasing our independence to work with other companies in the deployment of mobile infrastructure. It means we no longer have visibility of the operators full update plan. However, Cornerstone is fully committed to working closely with Local Planning Authorities and following best practice guidance. We aim to engage and work with the planning department at the earliest opportunity from when we are instructed to deliver new infrastructure within your Local Authority area and often conduct strategic pre-rollout engagement meetings to discuss our wider rollout. If your Local Authority would like a meeting to discuss wider Cornerstone rollout plans then please advise. We 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: Consultation letters have been sent to local ward councillors for North Middleton Ward.			
Summary of outcome/main issues raised (include copies of relevant correspondence): To date no comments have been received on the proposal.			

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School/College

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

No schools nearby

Civil Aviation Authority/Secretary of State for Defence or the operator of the civil safeguarding area or defence safeguarding area notification

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

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	25/06/2025	

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3. Proposed Development

The proposed site:

This application is submitted in support of an application for prior approval of the siting and appearance of a proposed new 20m telecommunications mast. This new site is necessary due to the pending decommission of operator's existing site in the area. The existing mast at Lower Stakehill Farm (E 389152 N 408574) has been served with a Notice to Quit (NTQ), due to plans for residential development in this location (24/00329/SCO). The proposed mast will be located at an elevated position to provide the replacement coverage and will avail from a significant amount of trees in the area which will reduce visibility. The proposal will also be viewed in the context of the A627 and other infrastructure in the area such as nearby wind turbines at Thornham Fold Farm. We believe that with the context of the area and the pending development of JP Allocation 2: Stakehill, the proposed location will be the most appropriate planning option, offering key infrastructure and continued future proofed connectivity to this important area of allocated development.

Government is committed to supporting investment in high-quality, reliable digital connectivity so that communities can benefit from faster economic growth and greater social inclusion. It is essential to keep pace with growing demand for internet bandwidth and mobile data from local businesses, residents and those who visit our communities. As part of Telefonica's continued network improvement program, there is a specific requirement for a new mast at this location to replace the coverage that will be lost from the NTQ site and provide a feasible option for future capacity in the network. This ensures that coverage and capacity requirements are maintained and enhanced in line with the operator's license.

WHP Telecoms have been commissioned to act on behalf of Cornerstone for the proposal in front of you. The specific proposal to maintain coverage within this cell comprises the proposed installation of a new 20m lattice mast, hosting 6no. antennas, with 3no. equipment cabinets within a fenced compound. All other associated ancillary apparatus and permitted development thereto. This option was selected due to its siting close to other vertical structures such as wind turbines as well as it being somewhat screened by existing trees and hedgerows. This option was seen as the most appropriate location available in planning terms within the search area that will replace coverage to be lost from the existing site. There is also an increased future need anticipated with nearby development, which this proposal will be suited to fulfil. It is important to note that this infrastructure is being relocated largely due to the allocated development site and so as not to be sited in close proximity to a residential area.

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The proposal falls within the limitations of permitted development pursuant to Part 16 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended (the GPDO), and consequently requires the prior approval of the authority as per A.2 (3) of Part 16 of the GPDO. The current proposal is being made due to the existing site being served with an NTQ due to residential development. We have carried out a search process to find a suitable new site that is a good balance between technical/operational requirements and town planning policy and guidance. The proposed site has been located in an area that will replace the existing coverage for Telefonica and that is seen as acceptable in terms of its siting and appearance.

It is recognised that the very nature of installing new communications infrastructure within the landscape requires a well-measured balance between the need to provide and maintain practical coverage with visual impact on the landscape, residential amenity, and other material considerations. The site is located in an area that has existing vertical infrastructure near major roadways and an area that will have increased housing and business development nearby in the future. There is good natural screening in terms of topography and extensive trees in the area and it is our opinion that there are no other preferable options within the search area.

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Figure 1: Proposed site location with the A627 and NTQ site in the background

The mast will appear as normal within the context of the location in relation to existing vertical structures and infrastructure in the area. The location of the proposal has been purposefully sited in this way to avoid harm to residential amenity and impact on the landscape as much as is reasonably practicable. The height of the mast has been kept to modest 20m when the principle of a 30m mast in this location has been set by the GPDO, therefore minimising its impact further due to the siting in an elevated location overlooking the target coverage area. The siting has been located so as to best integrate into the character of the location given the search area identified. The design has been kept to a slim and modest proposal which should reduce visual impact and appear normal in its setting, while providing urgent replacement coverage in this area.

The height of the mast has been kept to the minimum necessary to provide the required frequencies and coverage by the operators and to maintain compliance with the International Commission of Non-Ionising Radiation Protection standards. The bulk and amount of equipment has also been design with function in mind and

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to provide both the necessary apparatus and the ability to continue to provide new technology in the future. We believe that the form will be greatly softened in the landscape due to the location proposed and existing screening and infrastructure around the site.

The proposal has been sited and designed to avoid any perceivable harm from the development while providing an essential service of improved connectivity which is supported at national and local policy level. For connectivity to be maintained in this area it is essential that an appropriate site is developed. Given that the siting and design that has been put forward is the best available to the applicant in terms of reducing visual impact, protecting residential amenity, protecting the natural environment, and providing an essential service of connectivity in the area that is future proofed; it is believed that the assumption in favour of sustainable development should be applied and prior approval granted.



Figure 2: The site location showing tree coverage around the site and the elevated position (looking south west).

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Enclose map showing the cell centre and adjoining cells if appropriate:
This can be provided upon request.

Type of Structure (e.g. tower, mast, etc):	
Description: The proposed installation of a new 20m lattice mast, hosting 6no. antennas, with 3no. equipment cabinets within a fenced compound. All other associated ancillary apparatus and permitted development thereto.	
Overall Height:	20m
Height of existing building (where applicable):	NA
Equipment Housing: (W x D x H in mm)	
Meter Cabinet: 1000x470x1000	
EFF1: 725x850x2100	
Eff2e: 650x600x2000 (2no.)	
Materials (as applicable):	
Tower/mast etc – type of material and external colour:	Galvanized Steel
Equipment housing – type of material and external colour:	RAL 7035 – Light Grey

Reasons for choice of design, making reference to pre-application responses:
The applicant would reiterate that the siting of any base station proposal is intrinsically linked to operational need, the availability of sites and the land uses present within the target area. The design of a base station is in turn dictated by function and the context of the nominated site. The Applicant has followed the sequential approach outlined within National and Local policies and with no option to upgrade existing sites or use buildings or other structures, the proposal is the most appropriate option available. The principle of this development is already established by the GPDO and reinforced by the existence of nearby infrastructure development and vertical structures, therefore the design is believed to be the most respectful option that balances technical needs with the visual sensitivities of the landscape. For

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confirmation, the structure's height is required due to ICNIRP guidelines and coverage necessities. The proposed CS5S tower is a slim line permeable design, and utilising the tower legs for antenna supports (rather than a headframe design) reduces bulk and makes for a more sympathetic design in the landscape. This tower is a modern design and has the capability to support improved communications equipment in the future which will undoubtedly be required once residential development in this area begins and increases demand for high speed connectivity.

The technical requirements of mobile communication operators are acknowledged in the National Planning Policy Framework which states that local planning authorities should support electronic communications networks and their provision, including telecommunications and high-speed broadband. The Applicant has explored their site sharing opportunities in accordance with the sequential approach outlined within the NPPF and in this case, to replace the coverage that will be lost and to future proof for increased demand, a new site is the only option.

The points argued thus far indicate that the proposal strikes a good balance between environmental impact and operational considerations. The proposed height and design of this installation represents the best compromise between the visual impact of the proposal on the surrounding area and meeting the technical requirements to provide high-quality and high-speed communications infrastructure essential for economic growth and to improve a critical service as illustrated by the NPPF and the Local Plan.

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Health and Safety - including ICNIRP compliance

ICNIRP public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines. The proposed installation conforms to current government planning guidelines regarding potential health effects arising from telecommunications development and the operator has included an ICNIRP certificate within the application pack. Recent court cases have confirmed that the public perception of health risks can be a material consideration within the land-use planning system. The publication of the National Planning Policy continues to highlight the Governments view that the planning system is not the appropriate mechanism for determining health safeguards. It sends a clear message to local planning authorities stating that they must 'determine applications on planning grounds. This is reiterated in the Code of Practice.

Notably, Ofcom have now undertaken 5G audits in the major cities and the results indicate that the exposure levels are a small fraction of the limits. This further reinforces the PHE guidance in respect of 5G which states: "It is possible that there may be a small increase in overall exposure to radio waves when 5G is added to an existing network or in a new area. However, the overall exposure is expected to remain low relative to guidelines and, as such, there should be no consequences for public health." (<https://www.gov.uk/government/publications/5g-technologies-radio-waves-and-health>).

4. Technical Justification

The National Planning Policy Framework clearly states that authorities should not question the need for the service, nor seek to prevent competition between operators. Notwithstanding this fact, the Applicant considers it to be important to explain the technical justification for the site and how the facility fits into the overall network.

The Operators not only have a license requirement to provide a certain level of 3G/4G coverage to the population, but they are also obliged to meet the growing consumer demand for 5G coverage, especially as more people are purchasing 5G enabled devices. Customers expect to be able to access their portable handheld device wherever they are, whether that be indoors or outdoors and connect to the

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fastest service. In this case the proposal is to replace existing coverage that will be lost due to the NTQ as explained above.

The dynamic nature of technological advances in the telecommunications industry coupled with ever-increasing demand from subscribers dictates a continual reinvestment programme on the part of the operators. As a result, and in line with their license requirements, mobile operators are constantly developing their networks including filling holes where there is currently a lack of service provision. In this instance, the proposal is required due to the NTQ and the primary requirement is to replace coverage but this is also an opportunity to provide infrastructure that can be used in the future for improved connectivity in this area, providing essential services for new development, both residential and commercial.

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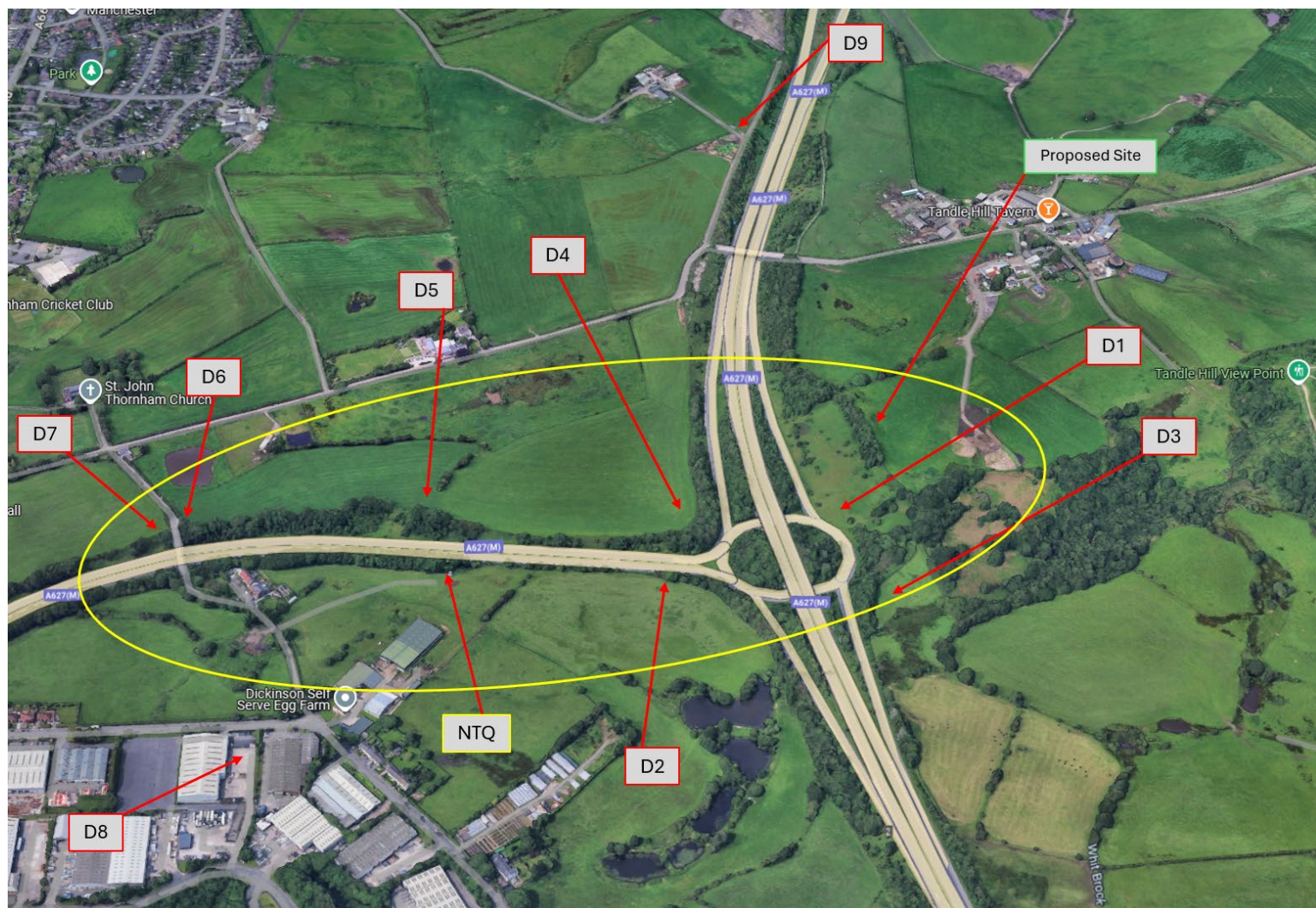
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5. Site Selection Process

The search area for this proposal was very limited due to the requirement to replace existing coverage and it was necessary to maintain an elevated position in the area.

Alternative sites considered and not chosen:

[https://gridreferencefinder.com?gr=SD8960708767|proposed s Site | 2,SD8915208574 | NTQ | 3,SD8956208665 | D1 | 1,SD8938208560 | D2 | 1,SD8960408548 | D3 | 1,SD8938308641 | D4 | 1,SD8911908666 | D5 | 1,SD8888208641 | D6 | 1,SD8884808639 | D7 | 1,SD8897108352 | D8 | 1,SD8949209345 | D9 | 1&v=r&labels=1](https://gridreferencefinder.com?gr=SD8960708767|proposed%20Site|2,SD8915208574|NTQ|3,SD8956208665|D1|1,SD8938208560|D2|1,SD8960408548|D3|1,SD8938308641|D4|1,SD8911908666|D5|1,SD8888208641|D6|1,SD8884808639|D7|1,SD8897108352|D8|1,SD8949209345|D9|1&v=r&labels=1)



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Site Type	Site name and address	National Grid Reference	Reason for not choosing site
D1	Grass Verge, Near Slattocks Interchange.	E 419416 N 290044	This location was considered for a lattice mast, however at a lower elevation a 25m+ structure would be necessary and the site was seen as much more open than the proposed, making the mast appear highly visible from the road. The sloping ground in this location and difficulties of access were also a concern that this site could not be built and serviced safely and effectively. This was discounted due to the perceived appearance with a lack of screening and due to operational concerns.
D2	Land 230m East of the Existing Site, Near Slattocks Link Road.	E 389382 N 408560	This location was considered for a lattice mast design, being close to the existing site, with good coverage possibilities. It was concluded, however, that due to JP A2 plans in the area including 24/00329/SCO with the potential of 350 residential dwellings on this site, that there would be more appropriate locations that could be investigated. This was discounted due to other development plans that could cause unknown future harm to the viability of this site and potentially another NTQ making this operationally non viable.
D3	Land at Field Near Slattocks Interchange.	E 389604 N 408548	This location was investigated within the search area; however, it was not feasible in terms of radio planning. The elevation at this location drops off and with the large trees nearby, it wasn't

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			possible to replicate coverage at this location. If existing coverage cannot be reasonably replaced, then the site must be discounted due to operational reasons.
D4	Land on North Side of Slattocks Link.	E 389383 N 408641	This location was considered as a good option near the roadway with tree screening in an elevated location. This area however was seen as necessary to avoid due to the JP A2 allocation for various development types including residential, such as ref: 23/00650/HYBR. Future development may force any site here to relocate again or to have reduced coverage due to additional clutter. When sites are located close to residential properties it can also create contentious relationships with the community and cause issues for future upgrades. It was also felt that in planning terms it would be preferable not to have a telecommunications mast in a potential residential area and that more appropriate options were available. For operational reasons, this was discounted due to lack of clarity on future viability.
D5	Land 100m North of the Existing Mast.	E 389119 N 408666	This location with good potential coverage was discounted for essentially the same reasons as D4, with allocations for residential and industrial development in the area. This uncertainty of future development and vision for the local area, has caused this option to be discounted for operational and planning reasons.

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D6	Land at Stakehill Lane	E 388882 N 408641	This site was investigated as it was a known telecommunications site which may have been able to be utilised. It was then discovered that the previous site at this location has been decommissioned. The location is also subject to the same restrictions as D4 and D5 in relation to Stakehill Allocations JP A2. Similar to these locations it was determined that a more appropriate location could be available, and the future viability of this option was unsure.
D7	Field of Lower Stakehill Farm	E 388848 N 408639	This location was investigated as there had been an application submitted for a new mast by another operator and was thought a site share could be an option. The application (24/00733/TELE) however, was refused for its impact on a nearby heritage asset and its inappropriateness with Policy JP A2 in this location. Due to this refusal, this location as an option for site share or any new mast was discounted.
D8	Land at Skyes Distribution Limited	E 388971 N 408352	This site was investigated, within the industrial estate, for viability although it was determined that for radio reasons it would not be successful as a replacement site. To maintain the network and existing coverage for the area, the industrial estate was too low in elevation and any mast here would not replicate the coverage or allow for the network to have capacity for any increased use in the area.
D9	Existing Mast, North of Thornham Lane.	E 389492 N 409345	This existing mast was considered for a site share option but at circa

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			850m from the NTQ site it was discounted for operational reasons, not providing the required coverage necessary for the operator and not a viable option within the search area.
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Land use planning designations:

The site location is within an area of Greenbelt as defined by the policies map (Places for Everyone Joint Development Plan) and further discussed in policy JP-G9 of Places for Everyone and G4 of the Rochdale Core Strategy. The purpose of the green belt in both policies is to stop urban sprawl and towns from merging together while restricting certain types of development, deemed inappropriate. In this context it is important to establish 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**. Therefore, the matter of inappropriate development in the greenbelt is not relevant in this case, and this is supported by the Planning Inspectorates appeal APP/B5480/W/20/3251086 from April 2021. The inspector states in paragraph 8 that:

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.

We would argue that the visual impact on the green belt would be very minimal and not a reason for refusal on siting and appearance grounds. This point is reiterated by a more recent appeal (APP/L3625/W/23/3314614) from January 2024 that states in paragraph 3:

There is no requirement to have regard to the development plan as there would be for any development requiring planning permission. Nevertheless, Policies DES1 and INF3 of the Reigate & Banstead Local Plan Development Management Plan 2019 (DMP) are material considerations to the extent that they encompass issues of siting and appearance. DMP Policy NHE5 is also referred to in the reason for refusal and applies to proposed development in the Green Belt, but not specifically telecommunications development. Since the principle of the development is established by the GPDO 2015, the question of whether the proposal represents

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inappropriate development in the Green Belt does not arise. Therefore, while I have noted the contents of Policy NHE5, it does not have a bearing on the prior approval matters in this case.

We believe that this makes it clear that inappropriate development in the Greenbelt is not a valid reason for refusal under prior approval matters and that in this case it is believed that the siting, design and appearance of the proposal is wholly appropriate under this process. We would encourage the authority to take into consideration the need for this mast in the area, the sympathetic design, and screening and the lack of other more appropriate options.

Additional relevant information:

From the outset, it should be appreciated that irrespective of the proposed installation's use as telecommunications apparatus, any change in form in the landscape will always be, to some degree, a noticeable alteration from certain viewpoints. It should also be recognised that visibility does not automatically result in an adverse harm and must be assessed in an appropriate context.

When considering the appropriateness of telecommunications development proposals, it is imperative that Decision Makers give precedence to telecommunications specific policy where it exists. If it does not exist at a local level, or if the policy is out of date, then the NPPF must prevail.

The recently published UK Infrastructure: A 10 year Strategy has been produced by the National Infrastructure and Service Transformation Authority and this further establishes that digital infrastructure is a key driver for government strategy. The strategy states in paragraph 3.38 that:

Digital infrastructure also increasingly underpins the provision of services critical for the functioning of society, business, and government – including the operation of other infrastructure sectors. In particular, demand for data centre services is projected to surge over the next decade including for AI development and deployment.¹²⁰ The government is committed to facilitating the development and expansion of cutting-edge, secure, and sustainable digital infrastructure that meets the needs of both the private and public sectors.

The Ministerial Forward from the Rt Hon Darren Jones MP, Chief Secretary to the Treasury also states:

Why does this matter? Because the economic arteries of the country – from roads, railways and airports to water, energy, digital and housing infrastructure

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– help deliver a more productive economy. And a more productive economy results in economic growth and better living standards for people in every part of the country.

This statement and the 10-year strategy help to show the extent that digital infrastructure is seen as an economic and social driver to the country, and that the benefits of this proposal will be significant and should be material in weighing up the balance of any decision made.

The following information outlines the various planning guidance and policy that have been considered relevant to the subject application. It is not necessary to quote extensively from this document, but the following points are highlighted.

National Planning Policy Framework

The government's National Planning Policy Framework (NPPF) sets out government's planning policies for England and how these are expected to be applied. Section 2 of the NPPF confirms that sustainable development is at the heart of the Framework.

Paragraph 8 states: *'Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways*

- to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
- to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.'*

The installation will enable the operator to provide the necessary replacement coverage and future upgraded services in this area. These services allow home working and working on the move and can reduce the need to travel, thus contributing to the sustainability agenda.

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The Government's latest thinking strongly supports communications infrastructure. Section 10 relates to 'Supporting high quality telecommunication'. Paragraph 119 of the framework document sets out the objectives of the communications Infrastructure. It states that '*advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being*'. This is echoed by the Council's own Digital Communications objectives. Planning decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections.'

Paragraph 120 states 'The number of radio and electronic communications masts, and the sites for such installations, 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. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate'.

Section 12 of the Framework relates to 'Achieving well-designed and beautiful places'.

Paragraph 131 states 'The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process'.

Public benefits are defined within the NPPG and could be anything that delivers economic, social or environmental progress. Benefits do not always have to be visible or accessible to the public in order to be genuine public benefits. In order for the UK to benefit from the huge potential of 5G Local Planning Authorities will have to weigh the Public Benefits of such connectivity with the requirements to instruct and manage the built environment. Central Government understands that this may present concerns with the various design solutions proposed but it is important that all Local Planning Authorities understand the technical needs of 5G and better understands the wider advantages of such new technology. This is further emphasised within the Commission's sixth Annual Monitoring Report, which is now known as the Infrastructure Progress Review, in March 2023. It concluded that the government has ambitious goals for infrastructure, but in many areas, it is not delivering fast enough. It did acknowledge

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that digital 'Infrastructure is a key part of the solution'. Although this proposal is for replacement coverage and not a 5G upgrade, the development would provide the potential for 5G connectivity in the future, should prior approval be granted.

Code of Best Practice on Mobile Network Development in England (2022)

The Code of Best Practice has been fully revised in 2022 and is now even more supportive of mobile network provision in line with Government aspirations that everyone should have access to the information no matter where they are located whether that be in rural or urban areas. This Code provides guidance to mobile network operators, their agents and contractors and equally to all local planning authorities in England. It supersedes the Code of Best Practice on Mobile Phone Network Development (2016).

The principal aim of this Code is to ensure that the Government's objective of supporting high quality communications infrastructure, which is vital to continued economic prosperity and social inclusion for all, is met. The development of such infrastructure must be achieved in a timely and efficient manner, and in a way which balances connectivity imperatives and the economic, community and social benefits that this brings with the environmental considerations that can be associated with such development.

The proposal will introduce new 5G services to the area. Notably, 5G also integrates the previous generations of mobile telephony through either utilising the existing radio spectrum and/or combining the advantages of previous generations and using multiple platforms to manage coverage and capacity. It is estimated that 5G will directly contribute to an additional £7 Billion a year to the UK economy in just six years from roll-out. Although 5G will undoubtedly bring new opportunities and huge benefits to society, we cannot escape from the requirement that new structures, antennas and ancillary equipment will be needed. But to do so the network needs to be surveyed, designed and planning approval obtained. It has been acknowledged by Government that we must ensure that we have the infrastructure in place to deliver 5G across our major centres and transport networks.

The Code acknowledges that there are special operational and technical considerations associated with mobile network development, which have changed over time due to changes in technology and associated changes in demand. The Code acknowledges that there remains a reliance on radio masts to provide the main umbrella of coverage. Typically, radio signals operate like light and must "see" over the target coverage area, they cannot be hidden and so there will always be a degree of visual impact.

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It is commonly known within the industry that there is a need to continually upgrade and improve mobile networks, which will not function without the necessary infrastructure on which they rely. This is confirmed within the Code of Best Practice on Mobile Network Development in England which acknowledges '4G and 5G are likely to require further network densification in order to meet growing customer demand for data' as well as improved coverage and capacity, together with ambitious Government aspirations.

The Code goes on to acknowledge that operators maximise the use of their existing network infrastructure for the provision of 5G services and are similarly upgrading their 4G network infrastructure to improve capacity and coverage. However, the revised Code continues to advise that this does not mean that there will not be a need for any new base stations. Indeed, for example, more base stations will be needed in areas where there has previously been only limited or no coverage and where coverage and capacity need to be enhanced in line with Government commitments and customer demand.

It implies that consumers, businesses and public bodies are increasingly relying on mobile communications and expect to receive a signal wherever they are. The Code indicates that recent changes in planning policy [and regulation] are intended to align with Government communications policy, where the ultimate goal is to achieve mobile coverage wherever it is needed.

The proposed development is well designed. Moreover, the installation will enable access to new services in the wider public good which supports ways of working which deliver wider planning, sustainability and quality of life benefits, is therefore in complete compliance with the Code of Best Practice.

Local Policy

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that "where in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material consideration indicates otherwise".

Rochdale Core Strategy 2016

The core strategy for Rochdale sets out the overall direction of growth and development for the borough including the strategic objectives and spatial strategy. Policies that are seen to support the application are E2 and E3 which promote communications technology and development that can benefit business. The Rochdale Core strategy does not include a specific Telecommunications policy, however **Places for Everyone Joint Development Plan** does include some more

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specific policies. These include policies JP-C1 An Integrated Network and JP-C2 Digital Connectivity. These policies support the provision of high-quality digital infrastructure that maximises coverage and ensures the ability to respond to changing technology. Based on national and local planning policy it is considered that the siting and appearance of this mast to provide essential replacement service is appropriate in nature and the assumption in favour of sustainable development should be applied and prior approval granted.

Economic and Social Benefits

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

Providing the latest digital infrastructure to enable improvements in digital technology empowers and enables residents to have the highest quality of life, supports the creation of high-quality jobs and achieves the maximum productivity levels. It also helps the economy to be resilient and competitive. This is in full accordance with the ambitions of the Local Development Plan. It will help this part of *Lancaster* become an area where its businesses, public service providers and citizens are using digital technology by default and to the fullest to grow their businesses and improve productivity to access skills, training and employment opportunities to address global challenges that have a local impact such as ill health, social isolation, and pollution; to improve living standards and well-being, helping people to lead prosperous and rewarding lives; and to improve the quality and value for money of public services.

In such instances, as described above, the NPPF supports development that improves the economic, social and environmental conditions in the area.

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Enhancing the 4G coverage and capacity in this area and enabling future 5G services will fully meet this national policy objective.

Mobile connectivity is essential to the future success of the economy. The combined value of 4G and 5G mobile connectivity is estimated to add £18.5bn to the economy by 2026 (Councils and Connectivity Sept 2018). Numbers of this scale cannot be underestimated. 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 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.

Health Benefits

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

Bristol harbour installed thermal cameras specifically designed to alert the authorities when people fall into the water. The technology was implemented after ten people tragically died in drowning accidents in the city in one year alone. The thermal cameras pick up when a person breaks a virtual barrier at the harbour edge - the council control centre is notified via 5G technology, and the local fire and rescue is subsequently called out if required. The lives of two people have already been saved by the technology. It can also create a better organised service where

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ambulance crew can instantly transmit life-saving details about a patient's condition to awaiting emergency departments. Information, from ultrasound images to blood pressure readings, and from heart rate to body temperature, can be sent to doctors ahead of an ambulance patient's arrival. This technology is not hypothetical – 02 and Vodafone began trialling 5G “smart ambulances” in the East of England and Milan.

Furthermore, the Future Communications Challenge Group has estimated that the economic impact of 5G on the UK could be around £112bn in 2020 per annum, rising to £164bn in 2030. In other words, about £2,500 per head of population. Numbers of this scale cannot be underestimated.

Conclusion

In conclusion, material planning weight should be assigned to the need and the delivery of *continued and enhanced* network coverage in fulfilling the operator's technical requirements in this part of *Stakehill*. In this respect the proposal is in accordance with the relevant planning policies and when taking a balanced assessment, any potential harm will be less than substantial and outweighed by the social and economic benefits the development will bring to the area.

Central Government attaches great importance to the design of the built environment and outlines this within Section 12 (para. 131) of the National Planning Policy Framework. It states:

“Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”

The applicant acknowledges that the local environment is unique, contributed to by the associated land uses, however, it should also be appreciated that each generation should therefore shape and sustain the built environment in ways that allow people to use, enjoy and benefit from it, without compromising the ability of future generations to do the same.

Change in the built environment is inevitable, caused by natural responses to social, economic, and technological change. There should be a clear distinction between 'harm' and 'visibility'. Just because something is visible, does not necessarily infer that it is inappropriate to the landscape, or will lead to 'harm'.

Without this proposed installation, network coverage for Telefonica in this area prevents the customers from accessing the best coverage on their mobile devices, contrary to the operators' license agreement and purposes in which the consumers purchased their mobile handsets, as well as being contrary to the guidance set out

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in NPPF. It will also be contrary to the aspirations of *Rochdale Borough Council*, tasked with supporting the delivery of improved digital connectivity by the Department Of Digital, Culture, Media and Sports (DCMS).

The proposed design is of a high standard and will not detract significantly from the existing visual and environmental character of the area. The benefits to residents and visitors by improving coverage to the area far outweigh any potential perceived negative impacts.

It is concluded that the proposal aligns with both national and local policy in principle and there are no material planning concerns identified at this time that would outweigh these policies. It is believed that the siting and appearance of the proposed new base station, which is the best option available to the operator, is appropriate within the character of the area, and therefore the assumption in favour of sustainable development should be applied and prior approval granted.

Confirmation that submitted drawings have been checked for accuracy

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Signed:	<u>Jack Corcoran</u>	Date:	<u></u>
Position:	<u>Town Planner</u>	<u>(on behalf of Cornerstone)</u>	

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