

SITE SPECIFIC SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Edmund St Car Park	Site Address:	Edmund St Car Park, Milnrow, Rochdale, Greater Manchester, OL16 4HR
NGR:	E: 392610, N: 412685		
Site Ref Number:	JET 32	Site Type: Macro	GF – Macro

2. Pre-Application Check List

Site Selection

Was an LPA mast register used to check for suitable sites by the operator or the LPA?	Yes	
If no explain why: N/A		
Was the industry site database checked for suitable sites by the operator:	Yes	
If no explain why: N/A		

Pre-application consultation with LPA

Written offer of pre-application consultation:	Yes
Was there pre-application contact:	No
Date of pre-application contact:	N/A
Name of contact:	N/A
Summary of outcome/Main issues raised: Pre-application letters were sent to the LPA on 12th March 2026 . No response was received.	

Ten Commitments Consultation

Rating of Site under Traffic Light Model:		Amber
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Consultees:-	On 12th March 2026 consultation letters were sent to... • Paul Waugh MP • Ward Cllrs Bamford, Davidson and Kelly
Summary of outcome/Main issues raised:	No responses were received.

School/College

Location of site in relation to school/college: The nearest school is Moorhouse Academy, which is some 400m north west of the proposal.
Outline of consultation carried out with school/college: This school is sufficient distance from the proposal, with intervening development such as residential property and other community facilities, that consultation is not deemed necessary or appropriate as per the Code of Practice.
Summary of outcome/Main issues raised: N/A

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

Will the structure be within 3km of an aerodrome or airfield?		No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		No
Details of response: The proposal is significantly further than 3km away from an aerodrome or airfield.		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	1st May 2026	

3. Proposed Development

The proposed site:

This Planning Statement has been prepared on behalf of Jet Infrastructure in support of a proposed telecommunications installation required to address a critical gap in network coverage and capacity within the Milnrow area of Rochdale.

The proposal will deliver new and improved service for VMO2 and VodafoneThree (the new merged entity of Vodafone and '3') customers and forms part of a targeted network improvement programme aimed at enhancing existing 4G service and introducing 5GSA capability to meet rising consumer demand, improve coverage and deliver increased network capacity, required to resolve a significant local service deficiency.

This poor network performance is demonstrated in the crowdsourced network performance data mapping shown further below within this document and appended to the application. This shows actual network performance data from peoples phones and looks beyond just 'coverage'. Capacity is an ever increasing issue where the network cannot handle the additional traffic created by data hungry applications and given the volume of people and devices accessing the network. This leads to dropped calls and constant buffering of data services. This capacity issue is often more of an issue than coverage in urban areas where there is a density of people and devices trying to access data services on the network, however in addition to the capacity issues here, coverage is also poor given the area given the limitations of 4G and 5G in terms of radio propagation from a base station and that fact that this part of Milnrow is serviced by a site that is outdated, too low, heavily compromised and cannot support the necessary infrastructure to deliver the most up to date service.

The great effort has gone into finding a location that minimises impact while delivering that improved service.

Background and Planning History

This has been an issue for some time and VMO2 and '3' have made various previous efforts to address it since as far back as 2020 – 6 years ago.

Current VMO2 and Vodafone service in the area is being provided by a 15m Jupiter pole on Elizabethan Way which gained prior approval in 2014 under application reference - **14/00129/TELE**. This replaced a previous pole that gained consent in 2008 under application **08/D51455**.

This site has been upgraded as the technology has changed and improved so that it has always provided the area with the latest technology and service, moving through earlier generations of 2G and 3G in 2008 to providing 4G from 2014. We are now in an era of 5G and 5GSA (stand alone) and the infrastructure in the area again requires upgrade to keep pace with this.

5G connectivity has much greater challenges than previous generations. This is discussed further later within this Statement but in the most simple terms, 5G uses higher frequency that does not travel as far, does not travel through material like buildings or trees as well, the higher frequency means design must adapt for ICNIRP compliance and 5G antennas are significantly heavier than previous generation antennas so that puts structural pressure on sites. Additionally, we are now a much more data-dependant society given the rise in smart phones, smart devices and data-hungry applications – this means network capacity is now much more of an issue than it was previously. In practical terms, this means that sites must be...

- Directly where the service demand is (as the service cannot travel as far)
- Taller to ensure things that block signal like trees and buildings are cleared and for ICNIRP compliance
- Be more structurally capable as the antennas are much heavier, more of them are required (especially if a site shared) and they must be hosted higher for reasons previously mentioned (which also adds structural windloading)
- More sites (and antennas) are required because of the exponential increase in data demand which impacts network capacity

These matters all directly dictate siting and design necessity much more than previously and are discussed in detail in the Government's 'Code of Practice' document.

Returning the situation in Milnrow and how these technical matters have presented themselves in a practical sense here...

The existing pole on Elizabethan way and some circa 135m south west of the proposal, referenced above, is shared between VMO2 and Vodafone. This pole is only providing 4G service at the moment. In its current form it cannot provide new 5G connectivity as it is structurally not capable to host the necessary 5G antennas nor is it tall enough to provide the necessary radio propagation to the wider area or provide ICNIRP compliance.

Even if it were to be replaced/upgraded to provide that necessary height it could no longer host all of the equipment of the two sharing operators unless the design were changed to an open headframe 'greenfield' type design like the proposal given 5G antennas are circa 3 times as heavy as 4G antennas and there would need to be two separate antenna systems – one for each operator.

While that design is acceptable off the streetscene in an industrial car park screened by trees and large commercial buildings like it is with the proposal, is felt that design would not be appropriate design for the streetscene location of the existing site on Elizabethan Way and so VMO2 and Vodafone must find a replacement site for their equipment in the locality if they are to provide the new and most up-to-date 5G standalone service expected of their Customers and required of them (as noted later in this Statement) by Government, controlled by Ofcom via licence obligations.

Alternatively, as has been attempted before and detailed later in this Statement, Vodafone could stay at the current location, upgrade the existing pole and VMO2 would find a new additional site in the locality.

The appended (and embedded further below) Crowdsourced network performance data map demonstrates the current issue clearly – the whole wider area clearly has very poor network service and this is shown by the red or very dark red colouring. However, the current pole is providing some good service (marked green to the extreme south of the mapping provided) to its very immediate locality. The area of quality network service is very small and localised. This service cannot propagate to the wider area as the site is too low and signal is blocked by trees and buildings.

As noted, this has been a long standing issue for the area and efforts in the past to address this have failed. These previous failures is the reason for the existence of the connectivity issues evidenced by the crowd sourced network performance data provided.

In 2020 there was an application **(20/00389/TELE)** for the necessary new pole to provide the new 5G service for VMO2, as referenced above, further north along Elizabethan Way some circa 130m away from the existing pole. This was refused. That decision was subsequently appealed **(APP/P4225/W/20/3259908)** and dismissed in 2021 due to harm in an open area and lack of robust sequential site selection test.

While this appeal was looking at a proposal that is wholly materially different from the proposal, subject of this application, in terms of siting and other material considerations, it does provide some useful insight and direction in terms of what the Inspector would deem as acceptable in this locality:-

*"I have no reason to dispute that mast sharing and the use of buildings are not viable alternatives in this location. However, the evidence is less compelling in relation to the **absence of alternative greenfield or brownfield sites**. In this regard, while some footways are too narrow to host the equipment, there is little to explain why other wider verges and footways in less prominent locations in the area are unsuitable. Although a small number of **service yards and car parks were discounted, taking into account the mixed uses in the area, it is not clear that there are no other such alternative sites**. Even if all such locations were considered and discounted on the grounds of unreasonable constraints on existing businesses, substantive evidence in this regard in the form of correspondence from landowners or operators has not been provided.*

*My visit coincided with the Covid-19 lockdown, at which time there was no shortage of available parking in the Bridge Street car park or neighbouring streets. Consequently, while the demand for parking would be likely to be higher during normal working patterns, it was not obvious to me that the area is under such significant parking pressure that the loss of 2-3 parking spaces would be detrimental to the safe operation of the highway. I accept that the parking provision for the nearby supermarket may already be below the level set out in the Council's parking standards. Nevertheless, there is little substantive evidence such as a parking survey or correspondence from the Council's highway department to confirm that the loss of 2-3 spaces in this, **or another, local car park** would result in unacceptable onstreet parking pressure.*

*Therefore, while the appellant has investigated alternative sites, it has not been robustly demonstrated that a satisfactory level of coverage could not be achieved **in another location where a 20m mast would not have such an adverse visual impact**. Therefore, on the basis of the evidence, I cannot be certain that no alternative sites would be available to provide the required coverage. This is a material consideration to which **I attach significant weight**.”*

As is clear, the Inspector is clearly giving direction that local car parks ‘would not have such an adverse impact’.

The applicant for this application, subject of this Statement, has taken account of this Inspector direction and reflected that in this proposal.

There was another application for a competitor network operator (3UK) refused in 2023 some 65m north west from the proposal near to the previous dismissal under application **22/01477/TELE**. This was also appealed and dismissed under **APP/P4225/W/23/3315713** later in 2023.

This decision again references the lack consideration of less impacting siting options within the commercial area:-

“Four other sites (D1-D4) for the positioning of a new mast were discounted by the appellant for a combination of amenity and pedestrian and highway safety reasons.”

*“For example, no other alternative sites in or adjacent to the southern part of the search area were assessed to **see if there were any potential options within the commercial area**.”*

Again, the Inspector is giving clear direction that the siting preference is a location off the streetscene and within a commercial unit.

The current proposal is wholly materially different from these previous refusals given its significant variation in siting and actually wholly reflects the Inspectors direction in both cases that a site within the car park of an adjacent commercial unit is likely to be acceptable.

While previous decisions have been for unilateral sites – one for VMO2, one for ‘3’ and the existing site remaining (with the intention of upgrade) for Vodafone, this proposal will now consolidate these operators on to a single, shared, site. That means 3 of 4 UK mobile network operators will be sharing on this single, consolidated, site. This is much more NPPF policy and Code of Practice guidance compliant in terms of sharing and minimising site numbers than previous.

The previous refusal locations are wholly different from the proposal in that they were sited on the streetscene and that made them significantly more prominent. Conversely, the proposal is siting in a commercial car park that is bounded by large commercial buildings and tall mature trees (which also have grown since previous decisions). Therefore, the proposal is much more acceptable both in terms of the commercial context of its siting and in terms of the reduced prominence due to extensive tree screening.

Additionally, in the past 3 years societies dependence upon digital connectivity has increased significant - the policy context and various Government strategies has changed to reflect that.

In fact, UK Government have just concluded a consultation on both Part 16 of the GPDO to further reduce restriction on this type of development and the NPPF so that even more weight may be given to the material benefits.

The photomontages submitted with the application demonstrate the points above in terms of how this is a significantly more discrete and less impactful proposal than previous but the most significant element is that across two separate appeal decisions for two competing mobile operators different Inspectors have given direction that a siting in a nearby commercial car park is likely to be acceptable – this insight and direction has been reflected in the proposal.

Site Location

5G radio technologies operate in higher radio frequency bands than previous technologies and these higher frequencies do not propagate as far as the lower frequencies of previous generations and, additionally, naturally result in more signal loss and greater interference from obstacles (like trees or buildings).

As a result, 5G sites must be located directly where the local demand is. This is an incredibly challenging search area that is made up of dense built-form with predominantly low-rise residential property surrounding a commercial/semi-industrial area adjacent to the busy A640 (Elizabethan Way) main arterial route running north to south through the area. This is all compounded further by a proliferation of underground services that the proposal cannot be sited on top of and a lack of space in commercial units for operational reasons.

This means there are very, very limited siting options in the area.

Milnrow is on the eastern edge of Rochdale, accessed via local roads or the M62. It lies approximately 2.5km east of Rochdale town centre and is well connected by local roads.

In a general sense this part of Milnrow is characterised simply by dense suburban style one and two storey residential development, community services and largescale commercial units. Further to the west, some 355m away, this is broken up by open agricultural fields, however, these are in the process of redevelopment to the new largescale Kingsway Business Park, which is part of Atom Valley (Greater Manchester growth zone). This adds extensive further commercial and light industrial character to the wider area and creates even greater need for the area to be serviced by high quality digital connectivity.

To the north of the wider area, outside the immediate context of the commercial landuse, the area is dominated by typical suburban residential development. This is the same to the east. To the south commercial landuse continues prior to this changing to residential between the commercial units and the M62.

The immediate character of the site itself is defined by the large scale commercial unit it is sited against and the boundary trees that separate it from the wider area. The site is immediately adjacent to the largescale 'Minky Vale Mill' commercial building – a homeware manufacturing business. Further to the west there, after the Minky Vale Mill building is another large industrial building between the Minky building and Elizabethan Way.

The site is with the commercial business car park (which we understand is owned by Rochdale Council), accessed via industrial appearing height restriction barriers. There is also a small electricity sub-station in the car park withing a palisade fence compound, not dissimilar to the compound finish of the proposal.

There is a small building within the walled car park that hosts 'Milnrow Cars' – a taxi service business. The car park also hosts large recycling bins for clothes etc.

Significantly, to the west side of the car park there is a bank of tall mature trees between circa 25m-50m in depth. These are between 15m-20m in height and provide significant screening and separation from these commercial units and the wider area. The fact that this bank of trees is so deep also means line of sight from outside is much more difficult and this additional distance and perspective for line of sight significantly reduces visibility and prominence.

Furthermore, the northern/north-eastern boundary of the car park is lined by 4 no. Lombardy Poplar trees – these trees are very tall at about 25m-30m in height and provide addition screening and separation from outside the site area. Additionally, when viewed very closeby, these trees can provide backdrop to further limit prominence and impact depending upon perspective.

Given this, the site is entirely enclosed within the large scale commercial context and separated from the wider area though extensive tall tree screening on the northern and western boundaries while the southern and eastern boundaries are enclosed by large scale commercial buildings.

This is demonstrated below:-

Red – site. Blue – tall mature trees. Yellow – commercial buildings.



Visibility does not essentially equate to harm and the careful siting demonstrated by the points above ensures amenity is protected with minimal impact. This is also demonstrated by the submitted photomontages.

It is clear that acceptable, viable, siting options are limited and with Planning History that has already had applications refused and appeals dismissed in the locality it is clear that options are few and far between. Any other siting option would be within a residential streetscene in the wider surrounding residential areas, on the main arterial route through the area (which has already had two dismissed appeals) or on the high street (Dale Street) with significantly greater overlooking, and subsequent impact upon residential amenity, streetscene and listed buildings in the wider area than the proposal.

This is really significant for the proposal given it is one of very locations, if not the only location, within the search area that could accommodate the site technically but also have visual amenity impacts minimised and mitigated in the way it has been demonstrated.

It is felt that the proposal put forward certainly minimises harm and is the best and least impactful viable option in that very challenging search area.

The siting makes use of the tree screening and backdrop, this will assist in the assimilation of the pole and minimised impact on visual and residential amenity, as advocated at Para 39 of the Government Code of Practice:-

“Placing a mast within or adjacent to an existing group of trees, vegetation and other natural features can reduce visual impact. Care should be taken to minimise the unnecessary loss of existing trees, though antennas will need to be sufficiently elevated to clear the tree-line and the trees may need to be maintained to prevent growth above a certain level.”

The proposal aligns with this Best Practice principle and policy in terms of finding the best viable option.

The proposal is also sited on a verge off the footpath to ensure no impact upon pedestrian movement.

Design

The height of the monopole at 23 metres is the minimum height required to provide high-quality 4G and 5G coverage to the intended target area from this location. If the mast height were any lower, it would not be able to provide sufficient coverage to the target coverage area due to radio propagation constraints and signals being blocked by surrounding ‘clutter’ in the form of tall trees are large buildings (large flat roofs cause radio reflection).

Modern 5GSA service is provided via higher frequency radio spectrum. This is helpful in that it can deliver low latency, high speed and high capacity data transfer required to service modern applications, sensors and devices, however, this spectrum does not propagate as far nor propagate through materials (like trees or buildings) as well as lower frequency spectrum utilised by previous generations. This directly impacts and advises the necessary height, design and siting to overcome that constraint.

As a result, 5G requires taller structures to achieve the same level of coverage footprint.

It is felt that this pole type design is the most sensitive that could be used. It is necessary to have this type of design that would be structurally capable of hosting the antennas of all the sharing operators at the necessary height.

5G antennas are circa three times as heavy as 4G antennas. RRUs (Remote Radio Units) are also needed to be sited adjacent to the antennas to negate signal disruption through long feeder cables (previous generations the radios could be hosted in cabinets at the base). Additional antennas are required so that the site can meet the network capacity requirements previously alluded. The pole has also been designed so that it can facilitate network sharing.

VMO2 and VodafoneThree will be sharing this site – this would negate the need for additional sites in the area (which may not be in a location so sympathetic and relatively discrete – as

demonstrated by previous appeal dismissals in the wider area) and would minimise the number of sites required, and therefore environmental impact, as advocated in the NPPF.

This is made clear in both 'Code of Practice' national Planning Guidance and NPPF...

Code of Practice Planning Guidance:-

*"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."*

*"Sites/masts: **sharing sites should always be considered as this reduces the total number of sites/masts required for the network and also minimises the visual intrusion caused by wireless infrastructure**. This may involve redeveloping an existing site, including **installing a replacement mast that can accommodate additional radio equipment**. However, the visual impact of site or mast sharing should be considered in the context of each individual location."*

*"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."*

NPPF:-

*"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."*

It is also noteworthy that the antennas, dishes and RRUs are flat in their design – this is necessary for their functionality. However, this means that they catch the wind like a windsail. This puts significant additional structural pressure on a site, especially at this necessary height.

A streetworks type pole would not be capable of hosting the antennas at this height. It would also not facilitate the sharing described, the additional antennas to address capacity, nor host all the necessary RRUs adjacent to the antennas. It simply would not have the structural capability to address all the matters alluded to.

The only other design capable would be a lattice type structure. While lattice structures are semi-permeable visually and certainly have their place where they are the more appropriate design option, it is not felt that this is the case here.

It was felt that a pole would be much more congruous in this car park setting given tall pole lighting columns are a common feature in car parks for lighting and so this setting would be much more suited to a pole.

The pole has been proposed galvanised grey and the antennas have been left a grey colour – this is intentional as the antennas must clear the adjacent trees for technical reasons mentioned and will blend at height with what is typically a grey sky backdrop – against minimising contrast from the backdrop they will typically be viewed against. There are also existing galvanised grey poles in the car park and streetlighting poles all around the wider area are galvanised grey so it was felt this was the most suitable and congruous colour in this setting, adjacent to commercial buildings etc.

These efforts to minimise contrast at the various heights is advocated at Paras 28 & 40 of the Government Code of Practice...

*“Mitigating visual impacts: when possible, operators should look to use sympathetic designs, materials and colour (including camouflage where appropriate) to **minimise the contrast between infrastructure and the area.**”*

*“Colouring and camouflage: where appropriate, **masts should be coloured to match their backdrop to minimise contrast in an urban or rural setting.**”*

Acknowledging the subjective nature of colour, if the LPA feel a different colour is more appropriate (possibly green to further assimilate with the trees it will be viewed against from different perspectives?) then the applicant would be happy to implement that. Conditions cannot be attached to applications for prior approval but there is a statutory condition that proposals must be built as per detail submitted with the application so that can simply be confirmed in writing mid-determination so the LPA to have control over that.

The use of this tower, capable of supporting antennas of sharing operators at this height to maximise radio propagation and, subsequently the coverage footprint, reduces the need for additional masts in the surrounding area that may have been required if the antennas were at a lower height.

There is space for equipment housing at the base – these will be green coloured and within the palisade fencing compound so will not cause any impact. It is felt this compound finish would be congruous in this area given the commercial/semi-industrial nature and given there is a similar small substation compound in the same car park.

For all these reasons, the monopole design is the most suitable design in this particular circumstance and preferable to a lattice design.

The improved digital connectivity also aligns with the Government’s Wireless infrastructure Strategy, Planning and Infrastructure Bill, 10 Year Infrastructure Strategy and the NPPF, all of

which promote digital connectivity infrastructure given the significant social and economic benefits it delivers locally, regionally and nationally.

The principal aim of the development is to enhance VMO2 and VodafoneThrees mobile broadband network coverage and capacity. Businesses, commuters, workers, visitors and residents all depend upon high quality network service to facilitate use of data-hungry applications on their phones and other devices. These applications carry significant socio-economic benefit, all underpinned by the connectivity provided by infrastructure such as the proposal.

Enclose map showing the cell centre and adjoining cells:

VMO2 and VodafoneThrees ongoing network improvement programme is in line with Government aspirations.

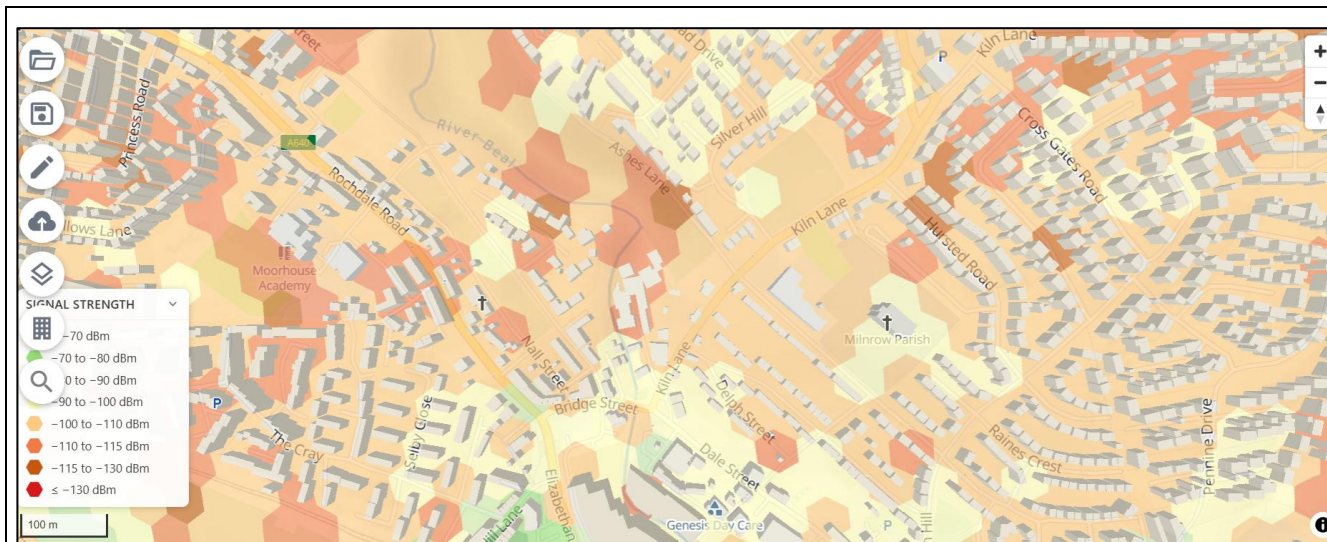
This area requires additional coverage and capacity to handle the volume of data traffic accessing the network via devices and phones. It also requires upgrade to the latest technology and service.

This is shown in the crowdsourced network performance data below. Anything that is not demarked green is sub-standard performance. Anything marked red is very poor performance. It is clear that the whole area is suffering from very poor service barring a very localised area that is being serviced by the current site. This is telling as it demonstrates the lack of capability from the current site in terms of reaching the surrounding area.

It also demonstrates that if VMO2 and VodafoneThree cannot site at this relatively discrete location to provide service to the surrounding wider area then it will need numerous additional sites all around those areas marked red. As demonstrated, these are dense residential streets and cul-de-sacs that do not benefit from the amenity safeguards demonstrated in the previous section and would most certainly be more impactful than the proposal – this in itself demonstrates that the best and most appropriate viable siting and design options have been proposed.

Given the network performance issue evidenced below, there is a specific requirement for a new base station installation (the proposal). This additional site will allow upgraded service to be delivered with improved coverage and capacity across the surrounding area. This area requires additional coverage and capacity to handle the volume of data traffic accessing the network via devices and phones.

Predicted coverage plots can be provided on request.



Type of Structure

Description:

The proposed development comprises the installation of a 23m high CU Phosco Phase 6 monopole supporting 6 no. VMO2 antennas, 6 no. VodafoneThree antennas and 30 no. Remote Radio Units (RRUs), 2 no. 600mm diameter dishes together with equipment housing and associated ancillary development within a palisade fence compound.

The installation has been designed to support both 4G and 5G technologies for sharing network operators. For full technical specifications and layout, please refer to the enclosed drawing package.

Overall Height: +23m AGL

Height of existing building N/A

Equipment Housing:

Length: See drawings

Width: See drawings

Height: See drawings

Materials

Tower/mast etc – type of material and external colour: Galvanised steel with grey antennas (as noted, happy to amend colour depending upon LPA preference).

Equipment housing – type of material and external colour: Steel equipment cabinets coloured 'Fir Green' (RAL 6009)

Reasons for choice of design:

This is discussed at length in the previous section of this document – to negate unnecessary duplication this will not be repeated but please reference the detail discussed previously.

The NPPF and Code of Practice encourages site sharing and the efficient use of existing telecommunications infrastructure. However, within the defined search area, there are no existing base stations that are capable of being shared to provide this new service.

Policy also advocates the use of buildings where possible and, as discussed at length previously, the buildings in the search area do not provide sufficient height.

The latest 5G service is delivered via higher frequency radio. This higher frequency is fantastic in that it can deliver high speed data services required for modern applications, however, it has the negative in that higher frequency does not propagate as far as lower frequencies used in previous generations, nor do the radio waves propagate through ‘clutter’ as well meaning that signal is blocked easily. ICNIRP exclusion zone is also typically larger. This necessitates antennas to be hosted higher to ensure ICNIRP compliance, so the radio frequency can propagate as far as is possible to maximise coverage footprint and so that there is line of sight above ‘clutter’ that would block the signal propagation.

All in all it is felt that that this proposed design strikes the best balance in terms of technical necessity to overcome technical constraints and minimising visual impact by keeping the height to an operational minimum, clearing the trees to assist radio propagation and being structurally capable of being shared by different network operators to minimise the need for additional sites in the area and by utilising a colour finish that will minimise contrast when viewed adjacent the typically grey sky and adjacent to other vertical infrastructure of similar finish, though we are happy to amend the colouring to match adjacent poles or the green tall trees.

In summary, this proposal represents the most efficient, least visually intrusive solution for delivering critical 4G improvements and new 5G coverage. It reflects a carefully considered approach to site selection, design, and environmental integration, and responds appropriately to both national planning guidance and the Operator’s legal obligations to provide robust, modern communications infrastructure.

The technical constraints that dictate and inform this siting and design are discussed at length throughout Governments ‘Code of Practice for Wireless Network Development in England’ Planning Guidance document (attached to this application).

4. Technical Information

ICNIRP Declaration attached 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. When determining compliance the emissions from all mobile phone network operators on the site are taken into account.	Yes	
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5. Technical Justification

Reason(s) why site required

In the UK, mobile network operators (MNOs) such as EE, VodafoneThree and VMO2 operate under a regulatory framework primarily controlled by Ofcom on behalf of UK Government. Their obligations arise from two main legal mechanisms:

- Wireless Telegraphy Act spectrum licences (for use of radio frequencies).
- General Conditions of Entitlement under the Communications Act 2003 (for provision of electronic communications networks/services).

Through the Spectrum Licence Obligations (Wireless Telegraphy Act 2006) mobile operators require licences from Ofcom to use radio spectrum, which is essential for operating mobile networks.

Key obligations typically include the use of allocated spectrum that must be used within specific frequency bands, power limits, emission standards and interference controls.

These conditions ensure efficient spectrum use and prevent interference. These radio spectrums are governed by the laws of physics but one spectrum/frequency will have different principles to another. Each Network Operator is licenced to use different spectrum and this is why what may be suitable siting for one operator may not be suitable for another. This directly influences potential siting opportunities for masts.

Perhaps most significantly, these licences are issued with coverage and network performance obligations. This will include things like roll-out or coverage requirements, minimum population coverage or geographic coverage requirements for rural areas. Obligations linked to specific technologies or generations like 5G.

Operators must be provide data to Ofcom on network performance and demonstrate compliance with coverage and network performance milestones to demonstrate they have met their licence obligations.

Additionally, under the General Conditions of Entitlement (Communications Regulation) any operator providing public electronic communications networks or services must comply with Ofcom's General Conditions.

This means that, amongst other things, an Operator must Operators must enable and maintain network integrity and resilience, and ensure access to emergency services.

If an Operator does not comply with these requirements then Ofcom, on behalf of UK Government, can issue substantial fines, withdraw spectrum or even cancel an Operators licence.

This is relevant to the proposal because...

1. The spectrum allocated, and the physics associated, directly impacts the siting options for the Operators.
2. The Operators must find a means of providing this service locally through the siting of a mast. While Operators will obviously want to provide the best service they can to their Customers, it goes beyond this in there is an actual legal obligation to provide this area with the most up to date 5G service with sufficient coverage and capacity to deliver quality network performance.

The Crowd Sourced network performance data show the failing network in the area.

The NPPF then requires that operators find an acceptable or the least impactful means of providing that service, minimising the impact while acknowledging the technical constraints. The proposal is permitted development (albeit ‘with prior approval’) so the principle of the development is established in law via Part 16 of the GPDO. This is an important distinction as under permitted development a solution must be found as consideration cannot be given to the principle, only that the proposal is acceptable or the most suitable option in terms of siting and appearance.

This is significant in an area as constrained as this, especially when such careful consideration has been given to siting and design to minimise impact while remaining functional and addressing the technical constraints.

Under the terms of their licence with UK Government (controlled via Ofcom on Governments behalf), Virgin Media O2 Limited (VMO2) and VodafoneThree are required to meet strict service obligations, ensuring that the benefits of mobile connectivity are extended to all communities, including those currently underserved.

This installation is required to provide improved 4G coverage and brand new 5G coverage for VM02 and VodafoneThree in Milnrow addressing existing gaps in service coverage, adding additional capacity and improving overall network performance in the locality.

Mobile base stations operate by transmitting radio signals that connect mobile devices to the wider network, allowing users to make calls, send texts, stream content, and access data services. These base stations are linked together—via fibre or wireless links—to form an interconnected network. Each base station serves a defined area known as a cell, and these cells overlap with adjacent ones to create seamless coverage. The size and shape of each cell can vary depending on local conditions, such as topography, building density, and user demand.

As low-powered radio transmitters, base stations have a limited effective range and must be located within or close to the areas they are designed to serve. Proposing this installation too far from the intended coverage area will leave parts of the target service area without essential mobile services. For this reason, the proposed location has been carefully selected to ensure the required coverage objectives can be achieved efficiently and effectively.

6. Sequential Site Selection Process – alternative sites considered and not chosen

Discounted Options

In seeking to meet growing network demand in the Milnrow area, the Operator's acquisition and survey agents have made every effort to identify a site that minimises any potential impact on the character of the area. However, in order to effectively deliver improved mobile services, it is essential that the communications site is located as close as possible to the area of customer demand.

In line with the sequential site selection process outlined in best practice guidance, the following criteria were followed when identifying a suitable location:

- a) Mast and Site Sharing**
- b) Use of Existing Buildings or Structures*
- c) New Ground-Based Installation*

As required by the Operator's licence and consistent with national planning guidance, the first preference was to utilise existing telecommunications infrastructure where it represented the most environmentally sensitive solution. The Ofcom Site Finder register was consulted to identify potential mast-sharing opportunities.

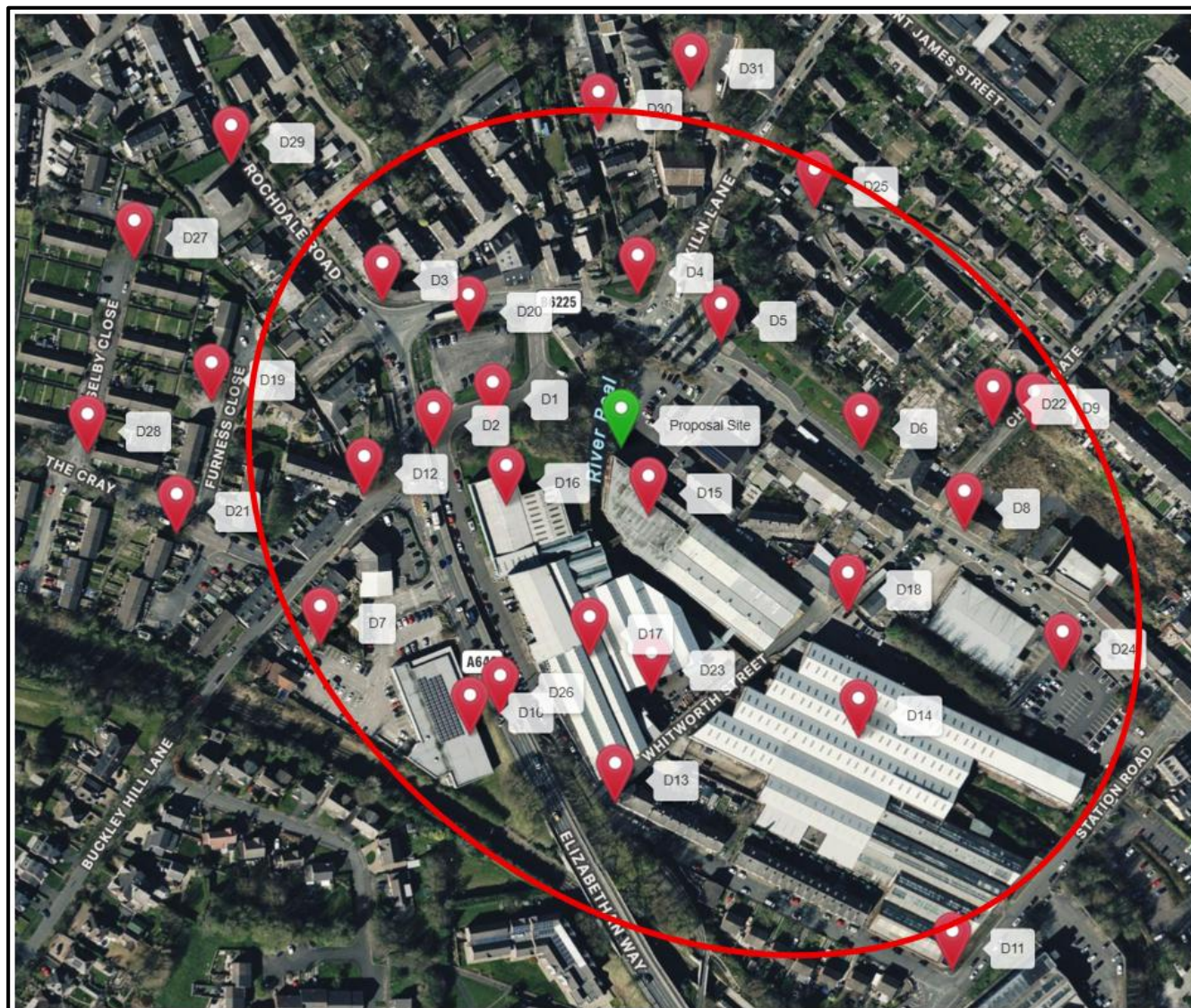
As no other suitable existing telecommunications sites were identified that could accommodate the extent of equipment required for this proposal, a new installation is required. There are no existing buildings that can be used due to operational issues previously alluded. However, albeit via a replacement, this proposal will facilitate sharing and network consolidation, hosting 3 of 4 UK network operators.

The local urban environment presented further constraints. Outside of the immediate commercial area around the proposal site the target service (search) area is predominantly comprised of one and two storey residential property on suburban streets and cul-de-sacs that would be directly overlooking the proposal. These are all significantly less favourable for installations for visual and residential amenity reasons in comparison to the proposal, for the reasons previously detailed.

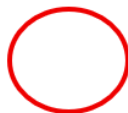
The proposal negates these potential impacts and so is the best, technically viable, option in the area. With this it complies with planning policy and guidance in terms of minimising visual impact, sharing and minimising the number of sites needed via consolidation.

A detailed list of alternative sites considered is provided below, with reasons for their exclusion in favour of the proposed site.

An enlarged version of the map has also been submitted as supplementary information as part of the application.



Key:-



Search Area



Selected Option



Discounted Option

Site	Address	NGR	Reason for discounting
D1 - Streetworks	Harbour Lane North, Lady House, Milnrow, Rochdale, Greater Manchester, England, OL16 3LQ	E: 392549 N: 412695	This site was investigated for a streetworks pole. However there was a previous application here, 22/01477/TELE, which was refused in 2023 for appearing visually dominant within the otherwise low form of the surrounding area, and being unduly harmful to the character and appearance of the

			immediate area, appearing as an incongruous addition to the streetscene. Within that appeal reference was made to using car parking in the more commercial areas nearby – which the proposal reflects. The proposed site is better shielded by the mature tree cover and also by virtue of being in the corner of a car park, well away from the exposed location of the refused site. For these reasons, and taking account the direction from previous appeal decisions, this option was discounted in favour of the proposal.
D2 - Streetworks	Harbour Lane North, Lady House, Milnrow, Rochdale, Greater Manchester, England, OL16 3LQ	E: 392521 N: 412683	This site was investigated for a streetworks pole. However there was a previous application here, 20/00389/TELE, which was refused in 2020 for being located in a prominent open location adjacent to a highway in close proximity of a busy junction used as a through route into and out of the town centre of Rochdale. This would result in unacceptable harm to the streetscene and visual amenity. Within that appeal reference was made to using car parking in the more commercial areas nearby – which the proposal reflects. The proposed site is better shielded by the mature tree cover and also by virtue of being in the corner of a car park, well away from the exposed location of the refused site. For these reasons, and taking account the direction from previous appeal decisions, this option was discounted in favour of the proposal.
D3 - Streetworks	4, Rochdale Road, Firgrove, Milnrow,	E: 392497 N: 412751	This location has a footpath of sufficient width to accommodate a streetworks proposal.

	Rochdale, Greater Manchester, England, OL16 3LN		However, this location is directly overlooked by numerous low rise housing properties on all sides. It also has no mitigation from trees so is more exposed and prominent. It is felt that this location would be significantly more impactful than the proposal and so this option was discounted in favour of the significantly more discrete proposal.
D4 – Streetworks	Bridge Street, Lady House, Milnrow, Rochdale, Greater Manchester, England, OL16 3ND	E: 392617 N: 412754	This location has a footpath of sufficient width to accommodate a streetworks proposal. However, this location is directly overlooked by numerous low rise housing properties on all sides. It also has less mitigation from trees so is more exposed and prominent. The Grade II* Listed Building at 2, 4 and 6 Bridge Street is also very near to this location, meaning unacceptable visual and heritage impacts. It is felt that this location would be significantly more impactful on heritage assets and streetscene than the proposal and so this option was discounted in favour of the significantly more discrete proposal.
D5 - Streetworks	Lady House, Milnrow, Rochdale, Greater Manchester, England, OL16 3LH	E: 392656 N: 412731	This location has a footpath of sufficient width to accommodate a streetworks proposal. However, this location is directly overlooked by numerous low rise housing properties on all sides. It also has less mitigation from trees so is more exposed and prominent. The Grade II* Listed Building at The Bobbin Public House And Adjacent Takeaway Restaurant is also very near to this location, meaning unacceptable visual and heritage impacts. It is felt that this location would be significantly more impactful on heritage assets and streetscene than the proposal and so this option was discounted in favour of the significantly more discrete proposal.

D6 - Streetworks	Dale Street, Lady House, Milnrow, Rochdale, Greater Manchester, England, OL16 3NJ	E: 392722 N: 412681	This location has a footpath of sufficient width to accommodate a streetworks proposal. However, this location is directly overlooked by numerous low rise housing properties on all sides. It also has no mitigation from trees so is more exposed and prominent. It is felt that this location would be significantly more impactful than the proposal and so this option was discounted in favour of the significantly more discrete proposal.
D7 - Streetworks	Buckley Hill Lane, Lady House, Milnrow, Rochdale, Greater Manchester, England, OL16 4BT	E: 392468 N: 412590	This location is on a car park edge with enough room to host the equipment. However, this location is directly overlooked by numerous low rise housing properties on all sides. It also has no mitigation from trees so is more exposed and prominent. It is felt that this location would be significantly more impactful than the proposal and so this option was discounted in favour of the significantly more discrete proposal. There is also a lot less mitigation from trees than the chosen proposal.
D8 - Streetworks	47, Dale Street, Lady House, Milnrow, Rochdale, Greater Manchester, England, OL16 3NJ	E: 392770 N: 412643	This location has a footpath of sufficient width to accommodate a streetworks proposal. However, this location is directly overlooked by numerous low rise housing properties on all sides. It also has less mitigation from trees so is more exposed and prominent. The Grade II* Listed Building at 45 and 47, Dale Street is also very near to this location, as well as the Grade II* Listed Building at 49 and 51, Dale Street meaning unacceptable visual and heritage impacts. It is felt that this location would be significantly more impactful than the proposal

			and so this option was discounted in favour of the significantly more discrete proposal.
D9 - Greenfield	Chapel Gate, Lady House, Milnrow, Rochdale, Greater Manchester, England, OL16 3LB	E: 392803 N: 412690	This greenfield site has enough room to host the equipment and is located away from the road. However, it is highly impactful to views at the Grade II* Listed Building at 45 and 47, Dale Street and the Grade II* Listed Building at 49 and 51, Dale Street. It is also more visible from local residential properties. Therefore this site would be unacceptable in terms of visual impact and impact upon heritage assets. As such, it was discounted in favour of the more discrete proposal.
D10 - Rooftop	Aldi, Elizabethan Way, Lady House, Milnrow, Rochdale, Greater Manchester, England, OL16 4GJ	E: 392538 N: 412548	This rooftop was considered as a potential option and its flat roof may have leant itself to a site. However, given it is much much too low. Additionally, with new 5G equipment rooftops present ICNIRP challenges, especially lower rooftops like this. This is compounded further by the fact there are solar panels on this roof so it will need to be accessed for maintenance and that would place maintenance workers in the ICNIRP exclusion zone without a very tall stub mast. This is discussed in detail in the Govt 'Code of Practice' with an infographic in the appendix of that document to demonstrate this. To address that ICNIRP challenge a very tall lattice style stub mast (for structural reasons to host the antennas at the necessary height) would be needed in the centre of the roof – this

			would have put excessive structural pressure on the rooftop and been significantly more viewable and impactful than the proposal. An alternative would be to place the antennas at the edge of the building to cover all sectors 360 degree service however this would have needed 3 or 4 lattice style stub masts of significant height (given it is too low for radio propagation reasons) on each edge of this rooftop. Again, this would have appeared significantly more impactful visually, across a much larger area, than the proposal. Solar panels also limit space on this rooftop. For all these reasons this option had to be discounted.
D11 - Streetworks	Station Road, Lady House, Milnrow, Rochdale, Greater Manchester, England, OL16 4HQ	E: 392764 N: 412437	This location is at the end of a residential street surrounded by large scape commercial units. The flat roofs of buildings this large can cause radio reflection that distorts signal and to address this a site would need to be very tall at this location, especially as this site is right at the very southern edge outside the search area. There is not the space at this steetscene location to support that necessary design and even if the space was available it would appear incongruous in this streetscene location. Additionally, given this is so far south and outside the search area it is unlikely this location could service the whole area without an additional site needed in the extreme north. As such, this option was discounted in favour of the much more suitable proposal.

D12 - Streetworks	Entwisle Street, Lady House, Milnrow, Rochdale, Greater Manchester, England, OL16 4DF	E: 392488 N: 412660	This location has a footpath of sufficient width to accommodate a streetworks proposal. However, this location is directly overlooked by numerous low rise housing properties on all sides. It also has no mitigation from trees so is more exposed and prominent. It is felt that this location would be significantly more impactful than the proposal and so this option was discounted in favour of the significantly more discrete proposal.
D13 - Streetworks	Harbour Lane North, Lady House, Milnrow, Rochdale, Greater Manchester, England, OL16 3LQ	E: 392606 N: 412516	This location has a footpath of sufficient width to accommodate a streetworks proposal. However, this location is directly overlooked by numerous low rise housing properties on all sides. It also has no mitigation from trees so is more exposed and prominent. It is felt that this location would be significantly more impactful than the proposal and so this option was discounted in favour of the significantly more discrete proposal.
D14 - Rooftop	Whitworth Street, Lady House, Milnrow, Rochdale, Greater Manchester, England, OL16 4HG	E: 392720 N: 412546	This rooftop was considered as a potential option. However, given it is too low and it is the incorrect shape and form it would be unable to host a telecoms site practically or structurally. It was therefore discounted as an option.
D15 - Rooftop	Clifton Street, Lady House, Milnrow, Rochdale, Greater Manchester, England, OL16 4HP	E: 392622 N: 412651	This rooftop is immediately adjacent to the proposal and is a flat design so in theory may have been possible to host the site. However, in practice, it is too low to host the antennas at the necessary height.

			Additionally, with new 5G equipment rooftops present ICNIRP challenges, especially lower rooftops like this. This is discussed in detail in the Govt 'Code of Practice' with an infographic in the appendix of that document to demonstrate this. To address that ICNIRP challenge a very tall lattice style stub mast (for structural reasons to host the antennas at the necessary height) would be needed in the centre of the roof – this would have put excessive structural pressure on the rooftop and been significantly more viewable and impactful than the proposal. An alternative would be to place the antennas at the edge of the building to cover all sectors 360 degree service however this would have needed 3 or 4 lattice style stub masts of significant height (given it is too low for radio propagation reasons) on each edge of this rooftop. Again, this would have appeared significantly more impactful visually, across a much larger area, than the proposal. For all these reasons this option had to be discounted.
D16 - Streetworks	Harbour Lane North, Lady House, Milnrow, Rochdale, Greater Manchester, England, OL16 3LQ	E:392555 N:412656	This rooftop was considered as a potential option. However, given it is too low and it is the incorrect shape and form (pitched) it would be unable to host a telecoms site practically or structurally. It was therefore discounted as an option.
D17 - Rooftop	Harbour Lane North, Lady House, Milnrow, Rochdale, Greater Manchester,	E: 392594 N: 412585	This rooftop was considered as a potential option. However, given it is too low and it is the incorrect shape and form (pitched) it would be unable to host a telecoms site practically or structurally.

	England, OL16 3LQ		It was therefore discounted as an option.
D18 - Greenfield	Whitworth Street, Lady House, Milnrow, Rochdale, Greater Manchester, England, OL16 4HG	E: 392716 N: 412606	This location was considered for a greenfield type option. However, this is the operational yard for a business where there are lots of large heavy machines moving around and transporting goods. As such, space is very constrained and very important to the operations of the business. This location is also at the southern side of the search area and so would have needed a taller site to try and cover the area to the north. This may have necessitated a lattice type design that would have been more impactful than the proposal. For all of the above reasons, this was discounted as an option.
D19 - Streetworks	Furness Close, Lady House, Milnrow, Rochdale, Greater Manchester, England, OL16 4DB	E: 392417 N: 412704	There is sufficient space here for a streetworks style proposal. However, this location is surrounded by low rise residential property and overlooked on all sides. This would create an impact upon visual and residential amenity, and streetscene, that does not occur at the proposal site. As such, this was discounted in favour of the much more discrete and less impactful proposal.
D20 - Greenfield	Harbour Lane North, Lady House, Milnrow, Rochdale, Greater	E: 392538 N: 412736	In a previous appeal decision the Inspector made various references to using car park areas as it would be more likely to be deemed acceptable.

	Manchester, England, OL16 3LQ		As such, this location was considered as an option. However, the proposal is also in a car park but that car mark is more associated with and in the context of large commercial units. It also benefits from significantly more tree screening to minimise and mitigate any visual impact. As such, this option was discounted in favour of the much more discrete and less impactful proposal.
D21 - Streetworks	The Cray, Lady House, Milnrow, Rochdale, Greater Manchester, England, OL16 4DW	E: 392400 N: 412643	There is sufficient space here for a streetworks style proposal. However, this location is surrounded by low rise residential property and overlooked on all sides. This would create an impact upon visual and residential amenity, and streetscene, that does not occur at the proposal site. As such, this was discounted in favour of the much more discrete and less impactful proposal.
D22 - Streetworks	Delph Street, Lady House, Milnrow, Rochdale, Greater Manchester, England, OL16 3LD	E: 392784 N: 412692	This location was considered for a streetworks option. However, it is highly impactful to views at the Grade II* Listed Building at 45 and 47, Dale Street and the Grade II* Listed Building at 49 and 51, Dale Street. It is also more visible from local residential properties. Therefore this site would be unacceptable in terms of visual impact and impact upon heritage assets. It is also at the south eastern edge of the search area meaning it is unlikely it could

			cover the whole target service area by itself and therefore may have necessitated an additional site in the area. As such, for all these reasons, it was discounted in favour of the more discrete and superior proposal in terms of service provision.
D23 - Greenfield	Whitworth Street, Lady House, Milnrow, Rochdale, Greater Manchester, England, OL16 3LQ	E: 392623 N: 412568	This location was considered for a greenfield type option. However, this is the operational yard for a business where there are lots of large heavy machines moving around and transporting goods. As such, space is very constrained and very important to the operations of the business. For all of the above reasons, this was discounted as an option.
D24 - Greenfield	Dale Street, Lady House, Milnrow, Rochdale, Greater Manchester, England, OL16 3NJ	E: 392816 N: 412577	In a previous appeal decision the Inspector made various references to using car park areas as it would be more likely to be deemed acceptable. As such, this location was considered as an option. However, this option is at the end of the high street and quite viewable from a high footfall area. Conversely, the proposal is also in a car park but that car mark is more associated with and in the context of large commercial units. It also benefits from significantly more tree screening to minimise and mitigate any visual impact. As such, this option was discounted in favour of the much more discrete and less impactful proposal.

D25 - Streetworks	Delph Street, Lady House, Milnrow, Rochdale, Greater Manchester, England, OL16 3LE	E: 392700 N: 412795	There is sufficient space here for a streetworks style proposal. However, this location is surrounded by low rise residential property and overlooked on all sides. This would create an impact upon visual and residential amenity, and streetscene, that does not occur at the proposal site. As such, this was discounted in favour of the much more discrete and less impactful proposal.
D26 - Streetworks	Elizabethan Way, Lady House, Milnrow, Rochdale, Greater Manchester, England, OL16 4GJ	E: 392552 N: 412557	This is the existing site shared with Vodafone. As noted previously in this Supporting Statement, this site is no longer capable of hosting all the necessary equipment at the necessary height to provide both the new 5G service or continue to be shared. While continued sharing would be ideal, the only way this could be achieved here is to replace the current streetworks pole with a larger open headframe pole similar to the proposal. There is no space in this footpath to host that and while that design is suitable at the proposal location, it would not be suitable at this more exposed and open location. For these reasons this option was discounted.
D27 - Streetworks	Selby Close, Lady House, Milnrow, Rochdale, Greater Manchester,	E: 392380 N: 412770	There is sufficient space here for a streetworks style proposal. However, this location is surrounded by low rise residential property and overlooked on all sides.

	England, OL16 4DD		This would create an impact upon visual and residential amenity, and streetscene, that does not occur at the proposal site. It is also most likely too far north of the target area so would need an additional site in the area to cover the whole target service area. As such, this was discounted in favour of the much more discrete and less impactful proposal.
D28 – Streetworks	Selby Close, Lady House, Milnrow, Rochdale, Greater Manchester, England, OL16 4DD	E: 392358 N: 412680	There is sufficient space here for a streetworks style proposal. However, this location is surrounded by low rise residential property and overlooked on all sides. This would create an impact upon visual and residential amenity, and streetscene, that does not occur at the proposal site. It is also most likely too far west of the target area so would need an additional site in the area to cover the whole target service area. As such, this was discounted in favour of the much more discrete and less impactful proposal.
D29 - Streetworks	22, Rochdale Road, Firgrove, Milnrow, Rochdale, Greater Manchester, England, OL16 3LJ	E: 392426 N: 412815	There is sufficient space here for a streetworks style proposal. However, this location is surrounded by low rise residential property and overlooked on all sides. This would create an impact upon visual and residential amenity, and streetscene, that does not occur at the proposal site. It is also most likely too far north of the target area so would need an additional site in the area to cover the whole target service area.

			As such, this was discounted in favour of the much more discrete and less impactful proposal.
D30 – Greenfield	Lily Street, Lady House, Milnrow, Rochdale, Greater Manchester, England, OL16 3NF	E: 392599 N: 412831	This was considered for a greenfield type option. However, it is right on the northern edge of the search area so it most likely would have needed an additional site in the southern side of the search area to cover the whole target service area. Additionally, it is directly overlooked by numerous residential properties and the setting is much less commercial in nature. This means it is a much more impactful than the proposal and was therefore discounted in favour of the more discrete proposal.
D31 - Greenfield	Mayfield Garage, 5, Kiln Lane, Lady House, Milnrow, Rochdale, Greater Manchester, England, OL16 3JF	E: 392642 N: 412849	This was considered for a greenfield type option. However, it is right on the northern edge of the search area so it most likely would have needed an additional site in the southern side of the search area to cover the whole target service area. Additionally, this is an operational yard for a business that uses large heavy machinery. As such, space is very important for the operation of the business. As such, there is unlikely to be sufficient space without impacting business operations. It is also felt that this area is much less commercial in character compared to the proposal and so there would be significantly more impact from siting here.

			For all these reasons this option was discounted in favour of the technically better and less impactful proposal.
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If no alternative site options have been investigated, please explain why:

N/A

7. Additional Relevant Information

Environmental information:

Photomontages have been submitted to demonstrate the minimal impact on visual and residential amenity, and streetscene.

Land use planning designations:

The site is located in the settlement limit but the area.

There are no other relevant designations.

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

From the outset, it is important to acknowledge that any alteration to the landscape (regardless of its function as telecommunications infrastructure) will inevitably be noticeable to nearby residents and frequent passers-by. However, visibility alone, or the siting and appearance of a development, does not inherently equate to significant or unacceptable harm.

When assessing the suitability of telecommunications development proposals, it is essential that decision-makers prioritise telecommunications-specific planning policy where such policy exists and balances the need and socio-economic benefits against perceived, or identified, harm.

In the absence of up-to-date or locally relevant guidance, the provisions of the NPPF must take precedence. It is also important to recognise that it would be unreasonable to expect specialised infrastructure, such as telecommunications equipment, to fully conform to general planning policy criteria that are not tailored to its unique requirements.

Legislation

The proposal constitutes permitted development with prior approval.

This means that the proposal is deemed acceptable in principle via Part 16 of the GPDO. As such, the principle of the development is not in question – just an assessment on the acceptability of the proposal in terms of siting and appearance.

The Local Development plan can be given limited weight in the determination of an application for prior approval – it is certainly not a determinable factor.

The development plan does not have the statutory primacy it has for full planning applications. Relevant development plan policies can be material considerations, but they do not bind the decision maker and cannot be determinative - this proposal is actually permitted development where the principle of the development is accepted in law (even in designations such as public open space or green belt).

Local Strategy and Planning Policy

It is a Strategic goal of Rochdale Council and Greater Manchester to be digitally connected. This is being achieved via the '**Digital Experience Strategy**' Council initiative and the Greater Manchester Combined Authority '**Places for Everyone Joint Development Plan 2022 to 2039**'. Through these initiatives the Council states:-

"The future growth of our borough relies on making more and better use of the opportunities that digital innovation and transformation provides. A digital place is one that utilises new technologies and systems. Digital people are able to take advantage of those new technologies and better their lives."

"We want everyone to have a positive digital experience. The council is committed to creating a digital infrastructure that will provide fast and responsive public services across our borough, keep communities connected and promote digital security."

*"Our boroughs need to be places where we can meet the housing needs of our residents, where all of our people can access the services, **they require through high quality digital communications.**"*

*"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."*

Policy JP-C1 'An integrated Network of the Joint Development Plan' specifically references this:-

*"In order to help deliver an accessible, low carbon Greater Manchester with world-class connectivity, **we will support a range of measures, including:***

*2. **Enabling the provision of high quality digital infrastructure;**"*

It continues at **paragraph 10.29...**

“Digital connections are increasingly important to every aspect of our lives, from socialising and shopping to learning, business and accessing essential services. They enable us to connect to people on the other side of the world as easily as on the same street. As these connections open up a range of opportunities it is important everyone can access them so that they can fully participate in society and our economy.

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 supports high-levels of social inclusion. This will be essential to capitalise on new innovations, such as artificial intelligence, the Internet of Things and connected and autonomous vehicles. Big data will also enable the city-region to be managed more effectively. By facilitating more home-working, good digital infrastructure can also help reduce the need for travel and therefore help reduce carbon emissions, traffic congestion and air pollution.”

“In order to achieve its ambition to be the UK's leading digital city and in the top five in Europe it is fundamental for all parts of the city-region to have access to world-class digital connections at an affordable price. The Plan area already has a vibrant digital economy, with particular strengths in key economic sectors such as the creative industries, health innovation, and advanced manufacturing and materials.”

“Improving digital infrastructure and ensuring that new development is connected to it is therefore a high priority.”

“Recent decades have shown the speed with which digital technology evolves, with a new generation of mobile technology being introduced around every ten years. The digital infrastructure will therefore need to adapt and evolve throughout the Plan period.”

Policy JP-CS: ‘Digital Connectivity’ looks at this specifically and 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;”

The Local Planning Policy and Council Strategy is very clear that mobile telecoms infrastructure is absolutely vital to the social and economic wellbeing of Rochdale and Greater Manchester and is fundamental to its sustainability and progress. This is particularly relevant to the proposal given it will provide network capacity to the economically locally and regionally strategically important Atom Valley and Kingsway Business Park developments.

The local UDP and Core Strategy is wholly outdated and there is limited prescriptive policy requirements for digital connectivity infrastructure in those documents or the emerging Local

Plan. This places greater weight on the NPPF policy and national 'Code of Practice' Planning Guidance.

However, there is some policy guidance included in the Greater Manchester 'Places for Everyone Joint Development Plan'. This is noted above.

This provides significant support for, and subsequent weight attached to, the material socio-economic benefits of digital connectivity infrastructure.

This policy specifically discusses how digital technology quickly evolves and the requirement that the member Boroughs 'ensure an ability to respond to updated/changing technology'. This is especially relevant to this proposal given the Planning History dating back to 2020, some 6 years ago, when first attempts were made to improve service in the area and provide the latest and most up to date technology.

As discussed throughout this Statement, the constraints around that new technology dictate and necessitate the siting and design requirements for the new infrastructure and that is very much relevant to this proposal.

The policy is also clear that coverage should be 'maximised whilst protecting townscape quality'. This is significant as it is felt that the proposal wholly complies with this policy requirement and that has been demonstrated in this through a robust sequential site selection process to identify the best, viable and least impactful location. This was also done after consideration of direction given in previous Planning appeals.

This moves the proposal into a more commercial area that is well screened. That safeguards the wider townscape and negates the need to site within the surrounding residential area. The design also assists with this policy compliance – a pole structure over a lattice that can provide the necessary structural capability provide all the necessary service from a single site while facilitating sharing – minimising the number of sites required and therefore reducing proliferation and impact on townscape by providing all the required connectivity from a discrete location.

With all this considered the proposal wholly complies with the relevant local planning policy.

On review it is clear that the proposal meets all local policy requirements and this siting and design is well justified against policy and is certainly the most appropriate, least impactful, viable proposal in what is a challenging search area.

Regional Policy and Strategy – Greater Manchester Combined Authority

World class Digital connectivity is a major strategic aim the Greater Manchester Combined Authority and the GMCA have numerous strategic documents that add significant evidential weight to the material socio-economic benefits of mobile connectivity and the necessary infrastructure to provide it.

One of the 7 ‘Connected Workstreams’ of the ‘**Greater Manchester Strategy 2025-35**’ is Digitally Connected Places and People’.

This states:-

*“It’s **essential** that everyone in our city region can thrive in the digital age – a new industrial revolution powered by artificial intelligence.”*

The need for digital connectivity, provided by infrastructure like the proposal, is discussed consistently throughout this document as something that underpins all strategic aspirations of the city region.

Additionally, the ‘**Greater Manchester Digital Blueprint 2023-26**’ adds further weight and context....

*“Ensure we have **world class digital infrastructure that stimulates economic growth** and enables the development of our growth zones, across sectors and localities.”*

Extending the digital infrastructure such as the proposal is also noted as a ‘Key Strategic Enabler’:-

Key strategic enablers



A Building digital skills and literacy for life, education, work and business



C Extending our world class digital infrastructure, technology and data



B Strengthening our digital talent pipeline



D Harnessing academia, testbeds and research

Finally, the ‘**Greater Manchester Industrial Strategy, June 2019**’ adds additional support and context for the need for 5G enabling digital infrastructure as something that underpins the city regions wider economic aspirations. This aspiration is noted:-

*“A top five city-region for the digital economy in Europe, with full fibre broadband and **5G coverage**, and with internationally-significant media and cyber-security clusters.”*

“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.”

*“Continue **transforming the digital connectivity of the city region to drive economic growth and innovation, working with government to meet national targets of nationwide full fibre coverage by 2033 and full roll-out of 5G technologies for most people by 2027.**”*

There is clearly extensive weight of support for infrastructure like the proposal. This proposal is part of a network that wholly underpins these wider strategic and economic aspirations of both Rochdale and Greater Manchester.

Without infrastructure like the proposal those aspirations cannot be met and it is significant that no specific area is deprived of this while the rest of the city region benefits, creating a digital divide that will impact the locality.

Again, this is particularly relevant to the proposal given it will provide network capacity to the nearby Atom Valley / Kingsway Business Park. Furthermore, it is significant that this area has already been deprived for some time now given initial attempts to deliver this new service failed 6 years ago in 2020. Since then exhaustive attempts have been made to address the issue and it is felt that the proposal brings for the correct solution to do that taking account of previous direction in decision making. If this proposal cannot be delivered it is unlikely that there will be any acceptable solution to deliver this necessary connectivity discussed in the numerous strategic documents referenced. This situation, in the context of those strategic documents and regional aspirations, weigh heavily in favour of the proposal.

National Digital Strategy, Planning Policy and Guidance:-

Code of Practice for Wireless Network Development in England

In March 2022 UK Government published their ‘Code of Practice for Wireless Network Development in England’ Planning Guidance document.

The document notes that...

*“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”*

This guidance document is clear that...

*“Digital connectivity is **vital to enable people to stay connected and businesses to grow. Fast, reliable digital connectivity can deliver economic, social and well-being benefits for the whole of the UK.**”*

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

The document clearly establishes the material socio-economic benefits of digital connectivity. However, from a really practical perspective, is also really useful in outlining the technical constraints associated with mobile infrastructure that dictate siting and design.

This application has gone into detail on the siting and design rationale of this proposal and this wholly aligns with the principles established within the Government guidance document. These technical constraints, and the solutions necessary to overcome them, are material considerations that should be given weight in favour of the proposal in any determination.

As noted previously in this statement, this Planning Guidance document advocates for and discusses the benefits of network sharing and consolidation in terms of reducing and minimising impact via negating proliferation.

Paras 28 and 40 discuss how proposals should minimise impact through good design and utilise colours that minimise and reduce contrast – this is wholly the case here with the colouring of the mast – grey pole as it will be viewed adjacent to existing grey vertical infrastructure and grey antennas as they must clear the trees for radio propagation and will be seen against a typically grey sky (though we can colour the pole green if it is felt this would be more sympathetic adjacent to the trees). Additionally, para 30 specifically advocates siting adjacent to trees for screening and backdrop to minimise impact.

All of these matters wholly align with the proposal. As such, the proposal wholly aligns with the Planning guidance for England provided by UK Government.

NPPF

First published in 2012 but updated as recently as December 2024 with a Government consultation just concluded, the NPPF is the central planning policy document for England. It sets out the government’s expectations for how planning decisions should be made and how development should be delivered.

The golden thread of the NPPF is a presumption in favour of sustainable development.

Chapter 10 ‘Supporting High Quality Communications’ sets out the main policy tests for telecoms proposals. It states...

*“Advanced, high quality and reliable communications infrastructure is **essential for economic growth and social well-being**. Planning policies and **decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G)** and full fibre broadband connections. 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; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).”*

*“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.”*

The policy also notes that when applying for a new mast evidence should be provided to show how the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure. It also discussed the need to minimise the number of sites required – this is done in the proposal via sharing by 3 of 4 UK network operators.

Again, the proposal wholly aligns with the policy tests required in the NPPF. It is significant to note the policy test specifically and purposefully notes ‘consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion’ – this is an acknowledgement of the technical constraints associated that directly influence siting and design (also noted in the Code of Practice Guidance) and gives clear indication and direction that weight must be applied to those operational matters.

The policy concluded that sites should be designed sympathetically – it is been demonstrated throughout the document that through considered siting and design impact has been minimised – siting in the context of heavy commercial/light-industrial landuse, siting adjacent to vegetation for screening/backdrop, colouring to assimilate with other adjacent structures, the lowest height that will keep the site viable operationally/technically, using a pole instead of a lattice as it will minimise impact while also being structurally capable to facilitate sharing that will safeguard the area from impact created by proliferation.

Evidence has also been provided of a robust sequential test that explores many numerous siting options, including on buildings and other structures, and clearly concludes that this is the most appropriate and least impactful siting.

With all this is it clear that the proposal wholly aligns with NPPF policy tests and requirements.

Furthermore, beyond Chapter 10, NPPF Chapter 6 ‘Building a Strong, Competitive Economy’ specifically advocates support for Digital Connectivity proposals....

“Planning policies should...

*pay particular regard to facilitating development to meet the needs of a **modern economy**, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, **digital infrastructure**, freight and logistics”*

“Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for:

- a) *clusters or networks of knowledge and data-driven, creative or high technology industries; and for new, expanded or upgraded facilities and **infrastructure that are needed to support the growth of these industries** (including data centres and grid connections);*
- c) *the expansion or modernisation of other **industries of local, regional or national importance to support economic growth** and resilience.”*

This policy goes further in adding great weight to the material benefits of the proposal as a counterbalance to perceived harm.

Mobile connectivity will be vital for the modern economy, connecting people and AI with data centres. Connecting IoT devices in Smart Cities with numerous benefits, including carbon reduction. Mobile infrastructure is clearly the ‘infrastructure that is needed to support the growth of these industries’.

Furthermore, this section of this document has gone into great detail in demonstrating how the proposal aligns with local, regional and national digital and economic aspirations – as such it also aligns with the NPPF policy supporting ‘industries of local, regional or national importance to support economic growth’.

In short, the proposal wholly aligns with both Chapter 10 and Chapter 6 of the NPPF and that must be given great weight in this determination and Planning Balance assessment.

Other National Strategy and Policy

It is felt that it is unnecessary to quote all the relevant documents but it is appropriate to reference them as they clearly show the intent, rationale and of the Government in relation to development like the proposal...

- Wireless Infrastructure Strategy
- Planning and Infrastructure Bill
- 10 Year Infrastructure Strategy

It is also significant to note that, under commitments made within the 10 Year Infrastructure Strategy a consultation on a review of Part 16 of the GPDO has just been concluded – this is with a view to reduce restrictions on digital connectivity infrastructure to promote its delivery. An NPPF consultation which has also recently concluded is also expected to add even more policy support for digital communications.

Ministerial Statements

Written Ministerial Statement UIN HCWS867: Boosting growth by removing barriers to digital infrastructure deployment, made by the then Minister of State for Data Protection and Telecoms, Sir Chris Bryant (attached to this application) states:-

*“Digital infrastructure **underpins growth right across the economy**, and is also a powerful contributor to the economy in its own right, with the sector worth an estimated £50 billion to the*

UK. It supports the adoption of new and emerging technologies including Artificial Intelligence and enables citizens to participate in modern life. In an increasingly online world, growth in data consumption and increased demands on the UK's digital infrastructure mean there is an urgent need to support the sector in delivering greater connectivity for local communities and businesses.

*We are committed to the rollout of gigabit-capable broadband and 5G networks, with the ultimate goal of enabling businesses, residents, and institutions to access seamless and reliable connectivity. **These efforts are essential to building a more competitive, equitable, and digitally connected nation.***

This clearly articulates Government's commitment to removing planning barriers, accelerating deployment and recognising digital communications infrastructure as critical to economic growth.

Similarly, Statement UIN HCWS1325 by Parliamentary Under-Secretary of State for AI and Online Safety Kanishka Narayan makes clear that:

*"Digital connectivity is at the foundation of our economy and society and **underpins almost every part of daily life.** The strength, security, and resilience of our digital infrastructure matters deeply to people, business and the economy in the UK."*

Other Material Considerations – Appeals

It is wholly acknowledged that every proposal must be considered on its own merits and there is no such thing as precedent in Planning.

However, appeal decisions can be material considerations to decisions with similar characteristics and main matters. They are certainly material considerations that can be given significant weight in cases where procedural and principle matters are established.

A dominant procedural and principled feature in appeal decisions is that there is a need for balance and identifying the least impactful option. In many cases harm can be identified but that harm must be **balanced against the material benefits, the technical constraints and the lack of a better viable option.** When that appropriate Planning Balance occurs, especially in the context of prior approval where the principle of the development is established in law, then proposals are often deemed acceptable, on balance.

While harm associated with this proposal is minimal, significantly, it is clear that great effort and consideration has gone into identifying the technically viable siting and design with the least impact.

In that context some recent, procedural and principle establishing, appeal decisions have been referenced below. These procedural and 'in principle' matters are wholly relevant to the proposal:-

APP/P4605/W/25/3359736

*“In conclusion, the siting and appearance of the proposed development would appear overly prominent and visually intrusive within the street scape. It would **therefore result in harm to the character and appearance of the area due to its height and siting**. Additionally, it is for the same reasons that it would result in harm to the living conditions of neighbouring residents regarding outlook.”*

*“The **Framework recognises that high quality and reliable communications infrastructure is essential for economic growth and social well-being**. Consequently, it supports the expansion of electronic communications networks, including 5G.*

The appeal scheme would provide coverage in an area which has no effective coverage. The lack of coverage would likely lead to a lack of/or very poor call set up, dropped calls and no capacity leading to no service.

*The **appellant has provided a sequential approach to site selection** in which approximately 32 sites were assessed. Many of the sites have been discounted due to, amongst other things, inadequate pavement widths, the presence of underground services and/or overhead lines, closer proximity to dwellings and/or education facilities, greater visibility due to both a lack of natural screening and/or requirements of a taller mast due to lower typography, proximity to access points, reduction in parking provision and /or visibility splays, as well as practical requirements to ensure no competition between the proposed 5G coverage and existing 3G and 4G cell areas and to achieve International Commission on Non-Ionizing Radiation Protection (ICNIRP) certification. **Various buildings and structures were also considered as part of the sequential approach however these were likewise discounted for practical reasons.***

*Given all of the above, in my judgement, it has **been adequately demonstrated that there are likely to be no other appropriate sites**, including buildings and existing masts, than the appeal site. I therefore **attach significant weight in favour of the appeal as a consequence**.*

*In conclusion, I consider the moderate **harm** the installation would cause to the character and appearance of the surrounding area and living conditions of neighbouring residents regarding outlook would be **outweighed by the benefits** of a high-quality communications network facilitated by the proposed development and **the lack of any more suitable alternative sites to provide this benefit.**”*

APP/P4605/W/24/3349032

*“I have found that the proposed development, through its siting and appearance, **would cause harm to the character and appearance of the area** for the reasons given above. The other options that might be available are therefore an important consideration.*

*The **Framework supports the development of a high-quality reliable communications infrastructure as this is deemed to be essential for economic growth and social well-being**. Nonetheless, it requires sites to be kept to a minimum and encourages the reuse and adaptation*

of existing base stations. Paragraph 122 of the Framework expects evidence to be submitted to justify all applications. For a new mast or base station this includes evidence that the possibility of erecting antennas on an existing building, mast or other structure has been explored.

The proposal is required to provide 5G coverage. It has been demonstrated that **the site is within an area with demonstrable need for an additional installation in the vicinity to achieve a full and appropriate level of coverage**. The coverage map has informed the appellant's search area for the new equipment and a sequential approach has been taken. In support of the application and now appeal, the **appellant has undertaken an assessment of 42 alternative sites within the defined search area required to provide coverage for the target area**. This included an assessment of several alternative sites that were identified by the Council.

The appellant has supplied a number of reasons as to why these sites should be discounted from the search including: concerns with upgrading the existing mast nearby, interference between masts, issues with the structural suitability and wind loading requirements of buildings in the search area and the impact the surrounding buildings and topography of the area would have upon signal transmissions. Certain sites were also discounted due to concerns with highway safety and the nearby railway line and underground services. Some sites were situated within residential areas or within parks close to trees that were covered by a Tree Preservation Order as well as concerns over the effect of the mast upon the character and appearance of the area which provided reasons to discount them.

Several of the alternative sites were located in the 'most' and 'more' sensitive locations as per the Guide. **While the site is in a 'more sensitive location', the proposed equipment is required to be sited within the search area and the principal of such equipment is not in dispute**. Taking into **consideration the significant constraints identified for the alternative sites**; existing buildings, masts, and other structures have been explored and reasonably discounted. Furthermore, comprehensive, and reliable evidence has been given for discounting other possible ground-based mast sites.

I conclude that the siting and appearance of the proposed installation would cause harm to the character and appearance of the area. However, based on the evidence before me, it is unlikely that there is a more suitable site within the search area that may reasonably be available. Therefore, any identified harm is outweighed by the need for the installation to be sited as proposed, taking into account the suitable alternatives."

APP/P4605/W/24/3357531

"As I have found that the proposal would cause harm to the character and appearance of the area, the National Planning Policy Framework (the Framework) requires that evidence of alternative sites is provided to justify the proposed development. Where this is in relation to a new mast or base station, this evidence should include that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure.

*I have no reason to doubt that the cell **search area is extremely contained**. On the basis of the evidence before me, I am **satisfied that the appellant has demonstrated that there is an identified need for the proposal to be located somewhere in the search area**.*

*The Council suggests that there are more suitable locations nearby. However, **the appellant has provided details of a number of alternative sites which were considered and discounted as part of the site selection process**, including detailed supporting information to fully corroborate that an exhaustive search of all possible sites was undertaken. These sites were discounted for a number of reasons including proximity to residential properties and other buildings, impact on visibility plays and proximity to underground services. **I am satisfied that there are no realistic opportunities to erect antennas on existing buildings, masts or other structures**. I consider that **the site selection process was robust and potential alternatives discounted on reasonable grounds and that the appellant has demonstrated that there are no clear alternatives which would be preferable**. **This carries significant weight in favour of the proposal.***

*The **proposal would support high-quality infrastructure, an approach which is supported by Chapter 10 of the Framework**. When **balancing this benefit against the harm identified in relation to the first main issue, I consider that the benefits of the proposal would outweigh the identified harm** to the character and appearance of the area.”*

As noted throughout, this proposal is indirectly advised by direction in previous appeals in this area which specifically advocated siting within nearby car parks within the commercial area – exactly as is the case with the proposal. This also weighs heavily in favour of the proposal.

It is clear that this proposal complies with...

- Rochdale Council Local Planning policy
- Rochdale Council and Greater Manchester Combined Authority digital and economic aspirations (as referenced above with various documents appended to this application)
- National Planning Policy (NPPF)
- National Planning Guidance (Code of Practice for Wireless Network Development)
- Wider national economic and digital aspirations and strategies
- Meets appropriate procedural and balance tests applied in appeal decisions

Planning Assessment

In accordance with Part 16 of the Town and Country Planning (General Permitted Development) (England) Order, this development is to be assessed primarily in terms of its siting and appearance.

While the provisions of the local development plan are not determinative, they remain material considerations where relevant to matters of design and visual impact. The key issues arising from this prior approval application are whether the proposed structure would appear visually intrusive or out of keeping with the character of the area, and whether any such impact would be outweighed by the substantial social and economic benefits associated with the deployment of 5G and the enhancement of next-generation digital infrastructure in the context of the technical constraints and lack of less impactful siting options.

In preparation of this application photomontages were completed to assist assessment of local impact. This photomontage report is attached to this application for detailed consideration.

Siting

As previously detailed, there is an urgent requirement to enhance mobile network coverage for various Operators in the Milnrow area of Rochdale. The siting of the installation has been carefully selected within a defined search area, ensuring the structure delivers the necessary coverage and capacity while avoiding duplication of infrastructure and providing the capability of sharing, in line with the NPPF policy and guidance on minimising mast proliferation.

It is important to acknowledge that it is rarely possible to introduce new telecommunications infrastructure into an area without some degree of visual impact. However, through sensitive siting and design, that impact has been minimised as far as practicable in this case.

The proposed location, within a car park amongst heavy commercial landuse and surrounded by tall mature trees will comfortably accommodate the proposal within this context would not create any unacceptable additional harm beyond what is there already. In fact, siting adjacent trees to provide screening and backdrop is directly advocated in local and national Planning Policy and Guidance.

Due to the careful siting, adjacent landuse, presence of a dense mature trees adjacent to which the proposal is sited, the proposal does not result in any unacceptable visual dominance or overlooking of sensitive receptors. Where visible it will create minimal material harm.

An extensive sequential site search was carried out and it has been robustly demonstrated that this is the only viable location in the search that will cause no significant impact to streetscene, residential amenity, visual amenity or heritage assets. There are other technically viable locations, however, they would be significantly more impactful on the local area than the proposal.

Visual appearance & Design

The height of the tower is the minimum height required to provide high-quality 4G and 5G coverage to the intended target area while addressing the technical constraints alluded, including clearance of adjacent trees which would obstruct signal propagation and the need for ICNIRP compliance given the larger exclusion zones associated with 5G equipment. As people pass by there will only be fleeting, distant, glimpses through intervening screening against the context of commercial landuse.

This minimal view, in the context of existing large scape commercial units, other vertical infrastructure and tree screening, ensures there is no significant harm.

The design of the pole is done to minimise impact – a slimline pole that can be shared is the most suitable design for this particular area as it addresses the structural requirements but negates a lattice tower, which would appear incongruous.

Grey and galvanised colouring has been used as it is simple and unfussy. It is felt this would be most suitable given the local context and other vertical infrastructure in the form of streetlights and other lighting poles are galvanised colour. However, colour can be subjective and that is acknowledged. As such, if preferable with the LPA, the applicant would be happy to colour the pole green to assist further assimilation with the tall trees it will be viewed against. The antennas will remain grey as they need to ‘see over’ the nearby trees so grey will ensure they do not contrast from the typically grey sky it will be viewed against but these can also be coloured as per preference as noted previously.

The height is the lowest possible that will work and the cabinets will be painted fir green to blend with street level vegetation, maintaining a tidy and consolidated area. The palisade fencing would be in keeping with the commercial context and there is already a palisade fencing compound in the host car park for a small electricity sub station. The proposal is set off the pedestrian pavement so will cause no impact on pedestrian flow.

Regarding antenna design, it is technically essential that the latest 4G and 5G antennas remain unshrouded. Higher-frequency signals required for fast data transmission are unable to effectively propagate through materials such as Glass Reinforced Plastic (GRP), which would be used in any shrouded enclosure. This limitation applies particularly to 5G but also affects advanced 4G antennas. Shrouding the antennas would compromise their performance, necessitating additional infrastructure elsewhere, again leading to a proliferation of masts. Shrouding would also act as a wind sail and add significantly greater windloading, necessitating a significantly more bulky structure than what is currently proposed. Both that necessary structure or shrouding on this structure would add bulk and unnecessary local impact. In this case, the proposal will be less impactful unshrouded.

As noted, the design is sharable and this safeguards the area from further mast development and proliferation.

In summary, the proposed design is the least visually intrusive whilst achieving the required level of continued and improved coverage, providing brand new 5G coverage and capacity to the area (as well as improving the existing 4G coverage) for numerous network Operators. As such the proposal development is sited and design to minimise the impact on the visual amenity, character and appearance of the surrounding areas. The structure makes the most of the existing setting and is the minimum possible height to be ICNIRP compliant, clear the urban clutter and for the antenna signal to reach the target coverage area.

As a result, the proposed development fully accords local and NPPF policy by striking a balance between visual and amenity concerns with the operators technical requirements.

Residential Amenity

There are some traditional industrial terrace dwellings nearby along Clifton street. Just two of these dwellings would have visibility of the proposal across the host car park and the whole terrace is literally in the shadow of the large scale commercial manufacturing buildings they are immediately adjacent to. These dwellings are typical of the late 18th and 19th centuries as towns and cities expanded to accommodate a growing urban workforce. As heavy industry concentrated around Manchester and Rochdale there was an urgent need for high-density, affordable housing within walking distance of factories and mills. These terraces were an intentionally practical solution and were built specifically to be in the context of commercial/industrial landuse.

As such, development types like the proposal do not appear incongruous in these settings and add limited additional impact beyond what is there already. The proposal pole is offset from main habitable windows of these two dwellings, across the car park, in the context of a large scale commercial building and against the backdrop of tall trees – as such impact on residential amenity is limited and minimised.

Given the extent of residential property in the wider search area outside and surrounding this commercial area this location certainly minimises impact on residential amenity given the points alluded to the fact that siting here negates the need to place a base station directly within a residential street or cul-de-sac that would be more incongruous and significantly more visible in a more residential context (verses the commercial context it is proposed). This is especially relevant as if a shared proposal is not achievable then there is the likelihood that there will be numerous unilateral sites needed in these area – something already seen via the Planning History. Negating that in itself safeguards residential amenity.

The development will not result in any loss of privacy, nor will it emit any noise, odour, artificial light, or vibration that could impact residents. The cooling fans within the equipment cabinets only operate under high temperatures and are not audible beyond a few metres. Site visits for maintenance are minimal and infrequent, generally once or twice per year with handheld tools only.

Given these considerations, the proposed installation would have minimal impact on residential amenity, with no material harm to outlook, privacy, or noise conditions. The proposal therefore complies with both national and local planning objectives for protecting amenity.

Sequential Test and Lack of Alternative Options

This is a very defined and constrained search area. This is due to the limitations of 5G discussed throughout this document and the fact that the new site must be directly where the demand for service is. Simply put, the higher frequency cannot travel far or through material as well and so sites must be directly where the demand is.

Great effort was made to identify a location that could still deliver the necessary service while minimising impact on sensitive receivers and taking account of the direction from previous appeal decisions in the area.

There were 31 alternative options discounted in this very small and defined search area. These were discounted due to impacts on heritage assets, visual/residential amenity, pedestrian obstruction, streetscene impacts, ICNIRP challenges, underground services and planning history.

The proposal is the least impactful, technically viable, location in the area – it is sited in a relatively discrete setting within commercial landuse with significant trees that will provide mitigation via screening and backdrop.

The robust sequential test with numerous discounts, the previous planning history of the cell area and through design consideration, confirm proposal is certainly the least impactful, viable, siting and design capable to delivering the necessary service uplift. With that in mind it the proposal meets the NPPF policy test related to ‘minimising harm (while taking account of the technical considerations)’. This principle also aligns with the procedural principles within the appeal decisions referenced above.

The proposal is permitted development (albeit ‘with prior approval’) so the principle of the development is established in law via Part 16 of the GPDO. This is an important distinction as under permitted development a solution must be found as consideration cannot be given to the principle, only that the proposal is acceptable or the most suitable option in terms of siting and appearance.

This is significant in an area as constrained as this, especially when such careful consideration has been given to siting and design to minimise impact while remaining functional and addressing the technical constraints.

Given the robust sequential test applied, and the relevant principles, this proposal is acceptable in planning terms.

Conclusion and Planning Balance

To conclude, there is a well-documented gap in mobile phone coverage and capacity for various network Operators within the Milnrow area of Rochdale. The proposed development addresses this critical gap by delivering improved 4G coverage and brand-new 5G capability to the area via a single, consolidated and shared site.

The selected site within and adjacent to commercial landuse surrounded by tall trees is significantly less impactful than any other location in the search area.

A comprehensive site search and assessment of discounted alternatives and planning history has demonstrated that this is the most suitable and sustainable location available within the defined search area.

The design is the lowest height it can be to attach the antennas at the necessary height to meet technical requirements of 5G. It is the most slimline it can be while being structurally capable to facilitate sharing and host antennas at height and in the context of windloading. It uses suitable

colouring to minimise harm. All of these technical constraints align with principles noted and established in the UK Govt Planning Guidance – ‘Code of Practice’.

The proposed development would not cause harm to residential amenity in terms of noise, privacy, or outlook, and accords fully with the requirements of both local and regional planning policy, regional strategic aspirations and the NPPF, particularly in relation to digital infrastructure provision and sustainable development. It meets the NPPF policy test to minimise harm (minimise, not invisibility) **while taking account of the technical constraints**, as noted in the NPPF and Code of Practice.

The robust sequential test with numerous discounts, and through design consideration, confirm proposal is certainly the least impactful, viable, siting and design capable to delivering the necessary service uplift. With that in mind it wholly meets the necessary tests for an application for ‘prior approval’, where the principle of development is established in law via Part 16 of the GPDO.

In terms of Planning balance - any visual impact is considered minimal and very localised. When that minimal and localised harm is weighed against the technical constraints, lack of favorable alternatives and public benefits of improved 4G and new 5G mobile connectivity, it would not significantly or demonstrably outweigh the scheme’s material socio-economic benefits and contribution to national, regional and local digital and economic objectives, as set out in the NPPF and other documents, which add evidential weight in favor of the proposals compliance with policy, referenced. This ensures this is a wholly acceptable proposal on balance in Planning terms.

For these reasons, the proposed telecommunications installation is considered wholly appropriate in planning terms and is respectfully submitted for the local planning authority’s approval under the prior approval process.

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